

AAMVA DL/ID Security Framework

Survey of the States on Implementation of Driver's License and Identification Card Reform

A Report by:

The American Association of
Motor Vehicle Administrators

and

The Driver License Compact and
Nonresident Violators Compact

Prepared by:

The AAMVA DL&C Implementation
and Maintenance Subcommittee

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American Association of
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DISCLAIMER

By acceptance of this document, you agree not to share the document or its contents with individuals outside of jurisdiction personnel. This document was developed for the sole purpose of sharing information with AAMVA member jurisdictions and should not be distributed to outside parties.

INTRODUCTION

The American Association of Motor Vehicle Administrators (AAMVA) accelerated their efforts in 2001, following the tragic events of September 11, to reform driver's license (DL) and personal identification card (ID) issuance. In January 2002, AAMVA charged the development of these best practices to the Uniform Identification (UID) Subcommittee, a subcommittee of the AAMVA Driver Licensing and Control (DL&C) Committee.

The UID Subcommittee was initially formed in the early 1990s to develop recommendations on uniform identification practices. The UID Subcommittee released a revision of the recommendations in 1996 titled the "Uniform Identification Practices – Model Program."

AAMVA partnered with the Driver License Compact (DLC) and Nonresident Violators Compact (NRVC) Executive Board in August 2002 to incorporate security requirements into the new Driver License Agreement (DLA) creating a comprehensive DL/ID issuance system.

In February 2004, AAMVA released the "DL/ID Security Framework – A Package of Decisions Based on Best Practices, Standards, Specifications and Recommendations to Enhance Driver's License Administration and Identification Security." For a motor vehicle administration (MVA) to declare compliance with the standards, they must meet the 13 requirements and 8 recommendations prescribed to satisfy the *Security Framework*. In November 2004, the DLC/NRVC Compacts Executive Board announced to its membership that the enhanced DLA would be finalized in early 2005 pending a vote of acceptance by MVA administrators.

In November 2004, the U.S. Congress passed the Intelligence Reform and Terrorism Prevention Act of 2004 (P.L. 108-458). The Act included provisions for driver's license and personal identification card issuance reform. The Act charged the Secretary of the Department of Transportation (DOT) to develop minimum requirements for DL/ID issuance through a negotiated rulemaking process.

To assist AAMVA and its membership in the rulemaking process, the AAMVA Board of Directors and the Compacts Executive Board reached out to the AAMVA Implementation and Maintenance (IM) Subcommittee, to develop and conduct a telephone survey to ascertain the current status of jurisdictions on their efforts to implement the measures of the *Security Framework*.

The IM Subcommittee conducted detailed telephone interviews with each U.S. jurisdiction from February 22 through March 25, 2005. The responses to the telephone surveys are detailed in this report.

The telephone surveys will assist the AAMVA Board of Directors and the Compacts Executive Board to develop uniform positions on DL/ID security issues as they relate to the negotiated rulemaking process and other proposed congressional legislation.

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HOW TO USE THIS REPORT

This report is divided into eight main sections. The first seven sections correspond to the seven minimum standards of the Intelligence Reform and Terrorism Prevention Act of 2004 (P.L. 108-458) (hereafter referred to as Act) on driver's license and personal identification card reform. Below is a brief description of each of the minimum standards in the Act and the *AAMVA DL/ID Security Framework* requirements and recommendations that correspond.

SECTION A: The Act requires the development of standards for documentation to be required as proof of identity of an applicant for a driver's license or personal identification card. Requirement 8 – acceptable verifiable resource list of the *Security Framework*.

SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card. Requirements 7 – verification process, 8 – acceptable verifiable resource list, and 9 – electronically verify data elements of the *Security Framework*.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud. Requirements 1 – FDR training, 3 – control measures, 5 – audit plan, 7 – verification process, 8 – acceptable verifiable resource list, 9 – electronically verify data elements, 10 – name collection and maintenance procedures, 11 – tying end of stay to expiration date of DL/ID, and 13 – cross reference data elements; and Recommendations 1 – risk assessment plan, 2 – capture all procedures and business processes in writing, and 3 – membership in the DLA of the *Security Framework*.

SECTION D: The Act requires the development of standards for information to be included on each driver's license or personal identification card, including (i) the person's full legal name, (ii) the person's date of birth, (iii) the person's gender, (iv) the person's license or personal identification card number, (v) a digital photograph of the person (vi) the person's address of principal residence, (vii) the person's signature. Requirements 8 – acceptable verifiable resource list, 10 – name collection use and maintenance procedures, 12 – AAMVA Card Design Specs, and 13 – cross reference data elements of the *Security Framework*.

SECTION E: The Act requires the development of standards for common machine-readable identity information to be included on each driver's license or personal identification card, including defined minimum data elements. Requirement 12 – AAMVA Card Design Specifications; and Recommendation 7 – limit use of information on Machine-Readable Technologies (MRT) of the *Security Framework*.

SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are (i) resistant to tampering, alteration, or counterfeiting; (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier. Requirement 12 – AAMVA Card Design Specifications of the *Security Framework*.

SECTION G: The Act requires that a state confiscate a driver's license or personal identification card if any component or security feature of the license or identification card is compromised. The *Security Framework* does not address confiscation of DL/IDs.

SECTION H: Survey Summary

To locate information on a specific section of the Act; refer to the appropriate section A–G. To locate information specific to the AAMVA *Security Framework*, please refer to sections A–F, to determine which *Security Framework* elements are continued within the Act sections. Please note that *Security Framework* elements may appear in multiple sections of the Act.

Comments and questions concerning this report should be addressed to Harold Kocken of the AAMVA Programs Division. AAMVA will strive to keep the content of this report up-to-date. We urge states to continue to provide any new information when available.

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This survey report was developed with funding and support from the Federal Motor Carrier Safety Administration (FMCSA).

ACRONYMS AND ABBREVIATIONS

AAMVA	American Association of Motor Vehicle Administrators
Act	Intelligence Reform and terrorism Prevention Act of 2004
AKA	Also Known As
BCIS	U.S. Bureau of Citizenship and Immigration Services
BMV	Bureau of Motor Vehicles
CDL	Commercial Driver's License
CDLIS	Commercial Driver's License Information System
CVP	Courtesy Verification Program
DEERS	Defense Enrollment Eligibility Reporting System
DHS	Department of Homeland Security
DLA	Driver License Agreement
DLC	Driver License Compact
DL&C	Driver Licensing and Control
DL	Driver's License
DMV	Division of Motor Vehicles
DOB	Date of Birth
DOS	Department of State
DOT	Department of Transportation
DPPA	Driver Privacy Protection Act
DPS	Department of Public Safety
DRIVERs	Driver Record Information Verification System
EVVER	Electronic Verification of Vital Event Records
FDR	Fraudulent Document Recognition
FIPP	Fraudulent Identification Prevention Program
FMCSA	Federal Motor Carrier Safety Administration
HAZMAT	Hazardous Materials
ID	Personal Identification Card
IMDLIS	Improved Driver License Information System
INS	(former) U.S. Immigration and Naturalization Services
ITIN	Individual Taxpayer Identification Number
LE	Law Enforcement

MCSIA	Motor Carrier Safety Improvement Act of 1986
MRT	Machine-Readable Technology
MVA	Motor Vehicle Administration
NCIC	National Crime Information Center
NDR	National Driver Register
NGMV	Next Generation Motor Vehicles
NLETS	National Law Enforcement Telecommunication System
NHTSA	National Highway Traffic Safety Administration
NRVC	Nonresident Violators Compact
OTJ	On-the-Job
OVD	Optical Variable Device
PDF	Portable Document Format
RACF	Resource Access Control Facility
USCIS	United States Citizenship and Immigration Services
USPS	United States Postal Service
USSS	United States Secret Service
SAVE	Systematic Alien Verification Entitlements
SSA	Social Security Administration
SSN	Social Security Number
SSOLV	Social Security On-line Verification
TVDL	Temporary Visitor Driver's License
VDEC	Vehicle Document Examiner Certification Training

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Section A

The Act requires the development of standards for documentation to be required as proof of identity of an applicant for a driver's license or personal identification card.

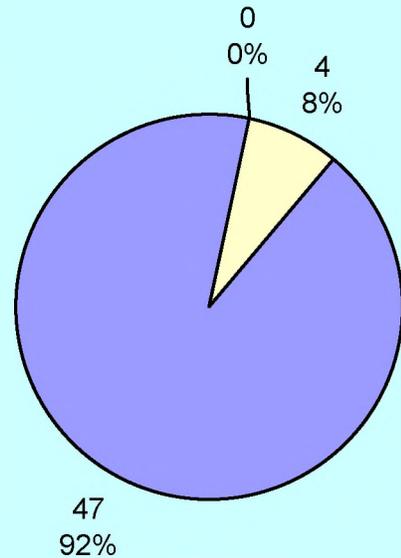
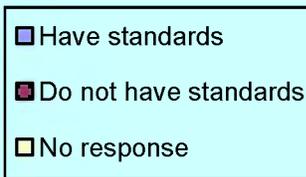
SECTION A: The Act requires the development of standards for documentation to be required as proof of identity of an applicant for a driver's license or personal identification card.

TABLE A-1	Have standards and procedures for providing proof of identity of a DL/ID applicant	Notes
Jurisdiction		
Alabama	YES	
Alaska	YES	
Arizona	YES	
Arkansas	YES	
California	YES	
Colorado	YES	
Connecticut	YES	Use the 1996 Identification Procedures. Require birth certificate or a passport from all applicants including the license from another state if it is a transfer.
Delaware	YES	Use the 1996 AAMVA standard and the DL U.S. Patriot Act requirements. ID cards are on the old AAMVA standards. Listed on their web at www.dmv.de.gov / under driver license; lists all of the requirements. Lists the HAZMAT requirements as well.
Florida	YES	Standard list of proof of ID and have legal presence. Is in state law.
Georgia	YES	List of acceptable documents
Hawaii	YES	
Idaho	YES	
Illinois	YES	
Indiana	YES	
Iowa	YES	Have a primary and secondary proof of identification list. Addressed in code by administrative rule that specifies that there be a primary and secondary listing.
Kansas	YES	
Kentucky	YES	
Louisiana	YES	
Maine		
Maryland	YES	
Massachusetts	YES	Have standards for proof of identity. Documentation based. Tiered identification procedures. Must provide either a SS card or a driver's license or a valid passport. Must give one of what they categorize as a primary document. The other forms of documents come from the primary or secondary document list. Must demonstrate name, DOB, MA residence and signature. Must provide an SSN that can be verified. If not eligible must provide a letter and provide an appropriate status code for immigration documents. Information is made available to the public through the driver manual and the Web site. Communicate to staff through training documents.
Michigan	YES	
Minnesota	YES	The list is required by law
Mississippi	YES	
Missouri	YES	
Montana	YES	
Nebraska	YES	
Nevada	-	
New Hampshire	YES	Have administrative rules that require specific documents for proof of identification.
New Jersey	YES	A six point ID program where the applicant must meet six points with one mandatory primary document and the rest from the secondary list. The primary document list is different for US citizens than non-citizens. Have a brochure that is mailed with renewals and is on the Web site. (will send list)
New Mexico	YES	
New York	YES	New York has a point-based system. Have a process that requires an applicant to submit proof of DOB and SSN or letter of ineligibility and a combination of other ID documents to add up to 6 points total. The document will vary on the amount of points it meets based on the process they went through to get the documents and the security features that are in the document. Documents vary in points from 1-6. Also base the documents on the data elements that are contained within the document. Do not have a residency requirement per se.
North Carolina	YES	
North Dakota	YES	

SECTION A: The Act requires the development of standards for documentation to be required as proof of identity of an applicant for a driver's license or personal identification card.

TABLE A-1	Have standards and procedures for providing proof of identity of a DL/ID applicant	Notes
Jurisdiction		
Ohio	YES	
Oklahoma	YES	
Oregon	YES	
Pennsylvania	YES	Have a short list of documents for proof of identification. Utilize a matrix.
Rhode Island		
South Carolina	YES	Require proof of identity. Have a procedural memorandum for their employees.
South Dakota	YES	
Tennessee	YES	Is in policy, rule and regulation
Texas	-	
Utah	YES	
Vermont	YES	Use of original AAMVA list of primary and secondary documents. Standard procedures for employees to follow. Procedures are in the examiner's manual, the law book and policy book. Have incorporated the list into administrative rule.
Virginia	YES	
Washington	YES	
West Virginia	YES	Listed in legislative rules. Have a procedures manual. Hand out a document to customers on acceptable documents. List of documents is also on the web site for U.S. and non-U.S. citizens.
Wisconsin	YES	
Wyoming	YES	Have a formal Driver Examiner's Manual that lists the standards and issuing procedures. The manual is updated monthly or quarterly.
District of Columbia	YES	All required documents on Web site

Summary: All jurisdictions surveyed indicated they have standards and procedures for providing proof of identity of an applicant for a DL/ID. All jurisdictions utilize a standard list for acceptable documents for proof of identification. Few jurisdictions are utilizing the *AAMVA Security Framework's - Acceptable Verifiable Resource List*. Jurisdictions use a variety of lists for proof of identification. Some jurisdictions continue to utilize the *1996 Uniform Identification - Model Practices*.



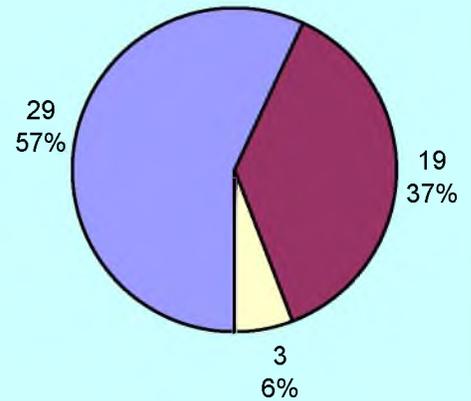
SECTION A: The Act requires the development of standards for documentation to be required as proof of identity of an applicant for a driver's license or personal identification card.

TABLE A-2	Standards and procedures meet or exceed the requirements developed by the DLA and the AAMVA Security Framework	Notes
Jurisdiction		
Alabama	YES	
Alaska	NO	Not entirely. Using 1996 AAMVA document standards. Haven't implemented new ones yet. Adopting regulations
Arizona	YES	
Arkansas	NO	
California	YES	
Colorado	YES	
Connecticut	YES	Using a form of the new AAMVA procedures.
Delaware	NO	Still using the 1996 AAMVA standards. In some areas DE is more stringent though.
Florida	YES	
Georgia	YES	Use the new Uniform ID framework. All documents they accept are on the AAMVA list. There are some things on the AAMVA list that GA does not accept.
Hawaii	NO	
Idaho	YES	
Illinois	YES	
Indiana	YES	
Iowa	NO	Current procedures are based on the 1996 AAMVA best practice document.
Kansas	YES	
Kentucky	NO	
Louisiana	YES	NGMV deployment has been pushed back to spring of 2007
Maine		
Maryland	YES	
Massachusetts	YES	MA standards are equal to the new AAMVA standard.
Michigan	NO	
Minnesota	YES	Yes we exceed the standards. We don't accept another state's card as primary identification.
Mississippi	YES	
Missouri	NO	
Montana	NO	
Nebraska	NO	
Nevada	YES	
New Hampshire	YES	NH does not accept as many documents as outlined in the <i>AAMVA Security Framework</i> .
New Jersey	YES	It exceeds as you must get to six points.
New Mexico	NO	
New York	YES	With the one exception of the proof of address with no requirement for proof of residency.
North Carolina	YES	May exceed standard
North Dakota	YES	
Ohio	YES	
Oklahoma	NO	
Oregon	NO	
Pennsylvania	YES	Standards exceed the Framework. PA does not accept state DLs as a proof of identity.
Rhode Island		
South Carolina	YES	
South Dakota	NO	We still accept out of state driver licenses for proof of name.
Tennessee	YES	They meet with some exceptions due to the TN certificate of driving. Accept some documents for the certificate of driving that would not be accepted for the DL/ID.
Texas	-	
Utah	NO	

SECTION A: The Act requires the development of standards for documentation to be required as proof of identity of an applicant for a driver's license or personal identification card.

TABLE A-2	Standards and procedures meet or exceed the requirements developed by the DLA and the AAMVA Security Framework	Notes
Jurisdiction		
Vermont	NO	Using 1996 list of acceptable documents and procedures.
Virginia	NO	Does not meet the current AAMVA list of acceptable resources. They accept some documents that are not on the AAMVA lists. Considering if they can adopt the current procedures.
Washington	NO	Acceptable document list is somewhat different-will provide
West Virginia	YES	
Wisconsin	NO	
Wyoming	YES	Meet the standards but do not exceed. Do not scan documents nor copy all documents. Examiners record what documents they review and enter into the system under proof of identification including the document numbers.
District of Columbia	YES	

Summary: A majority of jurisdictions indicate that they meet or exceed the standards developed by the *AAMVA Security Framework* and the Driver License Agreement. Many jurisdictions responded as meeting the standard but are using the old 1996 standards or similar to. It is difficult to summarize this table due to the variations in interpretations on meeting the newest standards as developed by AAMVA and the DLA.



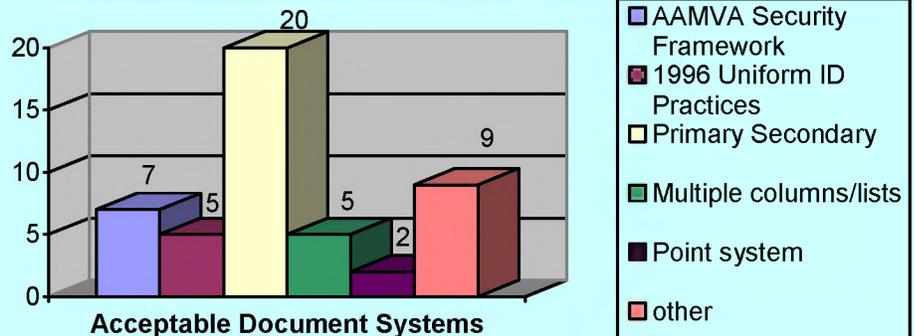
SECTION A: The Act requires the development of standards for documentation to be required as proof of identity of an applicant for a driver's license or personal identification card.

TABLE A-3	Utilize a standard list for acceptable proof of identity documents	Notes
Jurisdiction		
Alabama	YES	This is covered under our authorized presence requirement.
Alaska	YES	Require primary and secondary from our list.
Arizona	YES	Slightly different from Framework. See exhibit 1
Arkansas	YES	We use primary and secondary lists, based on 1996 AAMVA best practices.
California	YES	We do not require primary and secondary since we electronically verify legal presence and SSNs. We will provide the list. Similar to AAMVA list with a few exceptions.
Colorado	YES	Those listed in Framework-Must have 2 primary and 1 secondary
Connecticut	YES	On the website and have handouts at the branch offices. Require the birth certificate or a Passport plus one other form of ID. Matrix
Delaware	YES	Primary / Secondary
Florida	YES	Use a primary and secondary list. There are 20 states that they will not accept for proof of legal presence and identity. They do accept them as a secondary document and for proof of having taken the driving test. Have a primary and a secondary. Must have 1 primary. 6 documents on the primary list and a number of documents on the secondary list.
Georgia	YES	Have a three tier approach. Have documents that prove legal presence, prove identity and prove address. Some documents prove both. But must have combination of documents that meet the needs of all three categories.
Hawaii	YES	They are specified in both state and county Rules. County rules are more detailed than state Rules. We use a single list and use the Acceptable Verifiable Resources List for other documents to determine if they are acceptable beyond the Hawaii list. We don't accept foreign passports, but do accept immigration documents
Idaho	YES	Primary and Secondary-Similar to Framework
Illinois	YES	It's on our website and will be sent to AAMVA. We have a single list that closely mirrors the Acceptable Verifiable Resource lists. The list also shows unacceptable documents.
Indiana	YES	We have an identification list pursuant to Indiana law: 9-24-18-2. We have a primary list, a secondary list and proof of Indiana residency list. Applicants must provide: 1 document from the primary list, 1 from the secondary list and 1 from the residency list. They may substitute 2 primary documents.
Iowa	YES	Primary and secondary acceptable document listings*.
Kansas	YES	Will provide. Utilize a list similar to that in Framework and require prim/sec docs
Kentucky	YES	For immigrants we exceed the standard; For others, we very closely meet the standard. We use a primary and secondary list. We require SSN and birth certificate for everyone. The secondary list is used if they don't have a birth certificate. We have an exemption for SSN for religious reasons and allow use of a tax ID number in lieu of SSN. We will mail a copy of our lists to AAMVA.
Louisiana	YES	We use the AAMVA primary and secondary lists.
Maine		
Maryland	YES	Parallel closely. AAMVA data element concept is good concept. MD is still primary and secondary document based. MD works towards Security Framework in this regard. Photo captured at start of application. Out of state turned in licenses destroyed under supervision.
Massachusetts	YES	Primary/Secondary
Michigan	YES	Will provide
Minnesota	YES	Will provide
Mississippi	YES	We require a certified birth certificate issued by a state, not by a city or county or hospital; a Social Security card - non metal. Military ID with SSN on it is also acceptable. We also require proof of Mississippi residency. We have different standards for duplicates and for minors obtaining a first license. We also have a proof of residency list.
Missouri	YES	We follow the previous AAMVA primary and secondary lists.
Montana	YES	Primary and secondary list. Will send copy.
Nebraska	YES	We require one US based identification document with name and date of birth for a driver license. We require 2 forms of identification, one US based, for a State ID card. That's where the secondary list kicks in. We have primary and secondary lists which are not the same ones as AAMVA.
Nevada	YES	Primary and secondary-will provide
New Hampshire	YES	Listed in the rules.

SECTION A: The Act requires the development of standards for documentation to be required as proof of identity of an applicant for a driver's license or personal identification card.

TABLE A-3	Utilize a standard list for acceptable proof of identity documents	Notes
Jurisdiction		
New Jersey	YES	Point system
New Mexico	YES	
New York	YES	New York uses a point system. Have a form that they provide to the public that lists the documents that are acceptable. Also available on the NY web site.
North Carolina	YES	By NC statute you must provide two forms of identification. Parallels the AAMVA standards based on the recommendations in the Acceptable Verifiable Resource List. The documents that NC accepts are the same as in the Acceptable Verifiable Resource Lists.
North Dakota	YES	We do accept a valid Canadian passport and Canadian Government issued Birth Certificate. We also accept I94 cards stamped refugee or Asylee. We are close to the Acceptable Documents Lists in the DLA, with exceptions above. We have a primary and secondary list. The secondary list is only used when a ND licensee is getting a duplicate. All others have to provide primary documentation.
Ohio	YES	Primary and secondary document list
Oklahoma	YES	Primary and secondary list.
Oregon	YES	Oregon requires two primary documents or one primary plus two secondary documents to prove identity.
Pennsylvania	YES	Just use primary documents. Require the SS card. Must bring the card or a letter from SSA explaining they are not eligible for an SSN. Then use the INS control number as the identifier. Have a list of documents for US citizen and a list for non-citizens.
Rhode Island		
South Carolina	YES	SC utilizes document categories for proof of identity, address, social security number, etc. Each category lists the documents that are acceptable. For identity has to be one primary document from the list. Need a secondary document for people who may not have a birth certificate such as born before 1918. This is for identity only. Require other documents for proof of address and citizenship. Require proof of social security number.
South Dakota	YES	It is close to the old AAMVA standards. Primary and Secondary list.
Tennessee	YES	Primary and Secondary. At least 1 primary and 1 secondary document. Follow the 1996 Uniform Identification Standards.
Texas	YES	Will provide
Utah	YES	In addition to the standards, we accept a Utah issued Matricula, resident alien card, Indian blood degree, foreign birth certificate with certified translation
Vermont	YES	The 1996 version of list of acceptable documents.
Virginia	YES	Primary/Secondary
Washington	YES	Primary and secondary-and other supporting
West Virginia	YES	Use a list A and B. One list provides for proof of address and the other list for identity. Done for first time issuance and renewals.
Wisconsin	YES	We use a primary and secondary list. We have a 3 tier identity process: name, date of birth and WI residency.
Wyoming	YES	Primary and Secondary-If applicant is out of state and submits a DL or ID they must submit a birth certificate as well. For WY drivers they must submit current DL and ID or if new must submit birth certificate and other documentation. All pull up digital photos for WY drivers. For name changes require a marriage or divorce certificate. Must show the documentation from the birth certificate to the change of name.
District of Columbia	YES	Primary and Secondary

Summary: All jurisdictions surveyed indicate they utilize a standard list of acceptable documents. A variety of standardized lists are utilized.



SECTION A: The Act requires the development of standards for documentation to be required as proof of identity of an applicant for a driver's license or personal identification card.

TABLE A-4	Accept foreign documents other than Passports	Notes
Jurisdiction		
Alabama	NO	
Alaska	YES	Some as secondary documentation. Very rarely will use foreign birth certificates but must be interpreted. Generally use someone from our university.
Arizona	NO	
Arkansas	YES	We will accept foreign birth certificates with a certified translation.
California	NO	We only accept foreign passports when they are accompanied by an INS document (e.g., I94).
Colorado	NO	
Connecticut	NO	
Delaware	NO	
Florida	NO	
Georgia	YES	Will accept foreign birth certification with appropriate INS documentation.
Hawaii	NO	No unless it is translated (for example, we use original birth certificates to determine date of birth). We also accept Canadian driver's licenses.
Idaho	YES	Only in rare exceptions-may accept foreign government issued docs.
Illinois	YES	Foreign birth certificates if accompanied by other ID from our list for proof of date of birth.
Indiana	YES	These documents are contained on our ID list as well. Included are: Employment authorization documents, Refugee cards, Permanent Resident cards, Temporary Resident cards and other INS documentation. We require translation.
Iowa	YES	Canadian birth certificate – refugee cards – the I94
Kansas	YES	On occasion will take foreign birth certificate if accompanied by appropriate INS which must also show legal presence.
Kentucky	YES	We require the main identity document along with other immigration documents. We require a translation of foreign birth certificates.
Louisiana	YES	We accept the Permanent Resident Alien Card; Employment Authorization; and passport. All are considered primary documents.
Maine		
Maryland	YES	Try not to but regulations are not tight enough. There is a loophole. Any 2 documents of the list required even if they are foreign documents. Certified translation however is required....
Massachusetts	YES	Will accept an original or certified non-U.S. birth certificate. If not in English must be translated and must identify the translator. Accept a current or expired non-U.S. driver license but must have the applicant's signature. If not in English must be accompanied by the International Driving Permit.
Michigan	YES	If the documents are not in English, we require a translation. These are all considered secondary documents.
Minnesota	YES	Foreign documents must have a certified translation. Canadian birth certificate or naturalization certificates must have I94 and photo government ID.
Mississippi	YES	A certified birth certificate issued by another country interpreted into English by the University of Mississippi or by Jackson State.
Missouri	YES	We accept non- English birth certificates as secondary documents. We have it translated here before we use it. We have a state wide contract with translators. If it's an alpha character language, we use on line translators via an on line Web site application.
Montana	YES	Canadian (DL and birth certificates, foreign birth certificates translated in English by certified translator)
Nebraska	YES	As a secondary document for an ID card. They have to be translated by an approved translator. We don't accept them as a primary document.
Nevada	YES	Refugee, Travel Visa, I94 only w/Passport, I551
New Hampshire	YES	Birth Certificates and DLs in which NH has foreign reciprocity agreements.
New Jersey	YES	
New Mexico	YES	
New York	NO	Any foreign passports that are submitted must have the appropriate VISA and I94. Have a restriction on the I94 codes that they will accept. Have a requirement that the I94 must have been issued for 1 year by the INS and have 6 months remaining. There are other INS documents that they accept but no other foreign documents. The one exception is the Canadian birth certificate for the St. Regis tribe. Have an agreement with the St. Regis tribe. They can use the Canadian birth certificate. The tribe is in NY and Canada.

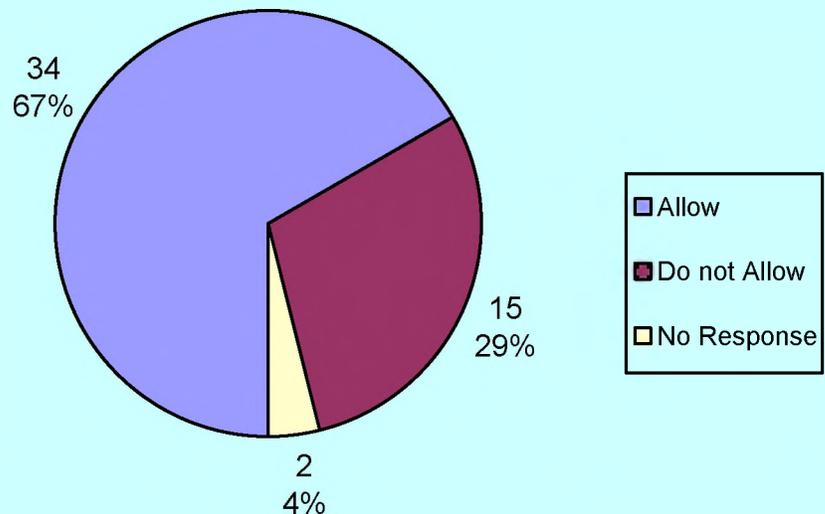
SECTION A: The Act requires the development of standards for documentation to be required as proof of identity of an applicant for a driver's license or personal identification card.

TABLE A-4	Accept foreign documents other than Passports	Notes
Jurisdiction		
North Carolina	NO	By law Canadian driver's licenses are treated the same as states. With Passport you must have the appropriate INS documentation as well.
North Dakota	NO	
Ohio	YES	Foreign birth certificate (with official translation)
Oklahoma	YES	
Oregon	YES	We accept the Mexican Consulate Card issued in Oregon, Guatemalan Consulate Card issued in the U.S. As secondary documents we accept foreign birth certificates, driver licenses, military ID, passports and voter registration cards. A foreign passport with an English translation within the document is accepted as a primary document. A foreign passport without an English translation or with an English translation that is separate from the document is only acceptable as a secondary document.
Pennsylvania	NO	
Rhode Island		
South Carolina	NO	Only accept US documents other than a passport.
South Dakota	NO	
Tennessee	YES	Will accept a foreign birth certificate if translated into English. No others.
Texas	YES	But not as stand-alone documents
Utah	YES	Resident Alien Card
Vermont	YES	Visa, employment authorization by refugees. Statute states that they need to provide passport, visa or other proof of legal presence.
Virginia	YES	Will accept the Canadian DL. Through the exceptions process, may accept a foreign DL with a translation though the Consular offices.
Washington	YES	Will accept valid or recently expired Mexican matricula, Mexican school records, etc.
West Virginia	NO	
Wisconsin	YES	Foreign birth certificates, Mexican voter registration cards, consulate cards from Mexico and Guatemala.
Wyoming	YES	Will accept the foreign DL with the International Driving Permit. Must also have the Passport/Visa and appropriate immigration documents.
District of Columbia	YES	

Summary: A majority of the jurisdictions accept foreign documents, other than a passport, as a form of proof of identification.

Appropriate immigration documentation in conjunction with foreign documents is generally required.

Jurisdictions generally require foreign documents, such as the birth certificate, to be translated.



SECTION A: The Act requires the development of standards for documentation to be required as proof of identity of an applicant for a driver's license or personal identification card.

TABLE A-5	Procedures for processing an applicant for proof of identify
Jurisdiction	
Alabama	This will be included in the authorized presence documents being sent to AAMVA.
Alaska	Review source documents. Will mail procedures
Arizona	Will provide
Arkansas	We review documents from the lists. We require two primaries or one primary and one secondary document. If our front counter person is satisfied, the application is processed.
California	We do electronic verification as mentioned above. If a document is doubtful it must be approved by a second person. We also retrieve the photos of previously licensed customers if they do not present their current or expired license.
Colorado	Will provide
Connecticut	Will provide
Delaware	On the web site. www.dmv.de.gov / under driver's license. All procedures are listed on the Web site.
Florida	Will send / are preparing a new process.
Georgia	-
Hawaii	Administrative Rule indicates what documents are acceptable. Some variances occur from county to county (island to island). Big Island is under Hawaii Police Department vs. being under the Director of Finance on other islands.
Idaho	Must have 2 or more primary and 1 or more secondary docs. Must be original or certified docs.
Illinois	Our ID policy manual will be mailed to AAMVA
Indiana	We ask for a birth certificate first, and go to the list if they don't have one. If they provide an out of country birth certificate, we ask other questions and require other proof of identity. Our list of acceptable documents is in a help chart kept at the front counters. It will be online with our new computer system. The new system is due to be on line Labor Day for branch offices and will be state wide by the first of year. We will mail a copy to AAMVA.
Iowa	Iowa utilizes an examiner's manual that states everything staff must follow for processing proof of identity. Are required to follow the law. Iowa utilized EVVER which includes a procedures manual. Iowa utilized a brochure that lists all of the documents which is provided to the customer (STOP Brochure) and is given to them as soon as they arrive (also available on their web site). An administrative rule lists the documents for proof of identity.
Kansas	See previous question. Make an attempt to work with the customer in an exception, but must see legal presence.
Kentucky	The applicant must provide acceptable documents.
Louisiana	We will mail policy or provide our website. We look at the documents and record them in a remarks section, note them on the application and image the application. Next Generation MV system (NGMV) in the spring of 2006 will have scanners right in field offices to scan breeder documents.
Maine	
Maryland	Enter document information (#, agency). Scan foreign and other out of the ordinary documents, stored (exception process). Intellicheck terminals to authenticate, SAVE program, Document checker (Keesing Company) for foreign (passport) documents. Foster Freeman system to verify documents. ID checking guide (online and book form).
Massachusetts	Will provide
Michigan	We record identifying numbers on the electronic application; we copy foreign documents; we record all identifying numbers and the type of proof presented on a declaration sheet. We refer questionable documents to our investigation division if we issue at all. (Our policy is to NOT issue) For original licenses issued to 18 year olds, the manager of the office must approve and sign for it. We require one primary document for under 18 - Under 18 requires parent to sign (capture parents' DL number.) For 18 and over, we require one primary and 2 secondary documents. We make a photo copy of the foreign source document, attach it to the declaration sheet and retain it for 2 years (foreign docs only).
Minnesota	Primary and secondary, or two primary documents. We ensure a mailing address in state. We need to be able to ensure documents are not fraudulent. Yes, we support the DL/ID Framework.
Mississippi	We rely on our list of proof of identity and residency documents and also use SSOLV. If foreign documents are presented, we call INS to verify legal presence.
Missouri	If applicant does not have an SSN, we process the application in the field, print the DL, take copies of source documents and send all these to the central office. We use a paper version of SAVE program with USCIS. We send them their completed form and copies of source documents. INS verifies documents and length of stay. If all checks out, we mail DL document to the applicant. July 1, '05 we plan to have an electronic version of SAVE program. All applicants must show one primary and one secondary or 2 primary ID forms. We use on line SSOLV for each. We have 11 state offices and 171 contract offices. All 11 state offices have been through AAMVA FDR training. About 15 contract offices have been through FDR training. Our plan is to have the remainder of contract offices go through FDR in future. Prior to FDR, we had a program with INS for fraud training and all contract offices went through that training.

SECTION A: The Act requires the development of standards for documentation to be required as proof of identity of an applicant for a driver's license or personal identification card.	
TABLE A-5	Procedures for processing an applicant for proof of identify
Jurisdiction	
Montana	Will send specific sections from manual.
Nebraska	We have an interactive DL system that walks the examiner though (F9 screen lists all acceptable proof of ID). If they don't present acceptable ID, the system will not issue a certificate to be taken to the County Treasurer for a license.
Nevada	Will provide-must see primary and secondary lists.
New Hampshire	Will provide
New Jersey	Will provide
New Mexico	-
New York	Have a two stop process. MVA rep will review DOB and documents. Capture the image and issue them a ticket. They then go to a different MVA rep who reviews the same documents. If they match and are genuine, then the process for transaction is initiated. Includes SSOLV verification and an internal search of an index to see that the number does not match up to any other NY driver. Use a random audit system. Will randomly freeze transactions where the supervisor must verify the process and sign off on the override. Three separate individuals will see the documents.
North Carolina	Also do fraud training. All documents are being reviewed by a person who has completed the FDR training program in NC.
North Dakota	US issued immigration document is required if an applicant cannot present one of the primary documents.
Ohio	We use SSOLV.
Oklahoma	FDR training. Procedures in place. Information will be sent.
Oregon	All proofs for an original issuance are viewed by two people, the counter person and preferably the Customer Service Manager or Lead worker. Authenticity of the documents is verified using magnifying glasses, blacklights, Docutector (web based reference) and other reference materials such as the U.S. Identification Manual and ID Checking Guide. All documents viewed must be original or certified copies.
Pennsylvania	Will provide
Rhode Island	
South Carolina	-
South Dakota	We have Administrative Rules & Procedures for field staff. Will mail copy. NDR., SSOLV, PDPS, CDLIS
Tennessee	Look at what TN currently has in place with the primary and secondary documentation requirements.
Texas	Will provide
Utah	In our law-will provide.
Vermont	Will provide
Virginia	Will provide
Washington	Utilize a combination of documents-will provide.
West Virginia	Is documented for employees.
Wisconsin	We will mail procedures to AAMVA. We require name and date of birth for everyone and if they are older than 18, we require proof of WI residency.
Wyoming	Use the verification process outlined in the procedures for examiners.
District of Columbia	Will provide
Summary: The procedures were too lengthy to provide in the telephone interview.	

SECTION A: The Act requires the development of standards for documentation to be required as proof of identity of an applicant for a driver's license or personal identification card.

TABLE A-6	Have exception processing for proof of identification procedures	Notes
Jurisdiction		
Alabama	NO	
Alaska	YES	Supervisory review process for extreme cases and only for duplicates. No exceptions for originals. Do not have exception processing for non-citizens.
Arizona	N/A	Will provide
Arkansas	NO	They must have proof of identity documents.
California	YES	For specified (in procedures that will be sent) individuals, manager's discretion may be used. Example: born before 1935, mentally disturbed, abandoned child, ward of court homeless
Colorado	YES	Will take one primary that contains DOB and legal presence status, along with 1 secondary doc. The secondary docs may vary. All docs are photocopied and kept on file
Connecticut	YES	The application will be denied at the branch office. Then the applicant can request an administrative review. Will be reviewed at the main office and then the applicant will be notified of the decision. Have encountered discrepancies on name issues. Tends to happen more for non-citizens who have been denied a license. Have used the AAMVA affidavit on name changes. Do ask for birth certificates of relatives. Central office will process the exceptions. May be a phone call from the branch office while the customer is there. CT is an over the counter state but that is under review.
Delaware	NO	Must meet the DE requirements. Chief of Driver Services may deal with some exceptions.
Florida	NO	There are extenuating circumstances that they have to process an exemption (e.g., an elderly person without a birth certificate). It is not written and requires a supervisor. They do check Autotrack to check the history of the person.
Georgia	NO	
Hawaii	YES	We utilize the AAMVA Acceptable Verifiable Resource Lists for any exceptions that are not contained in our Rules. If they can't provide required documents, they do not get a license. If someone lost everything, we have worked with the former state to identify a previously licensed driver. This happens very rarely and only at the agency head level. We have called the other state's DMV for a fax of data including an image to match to the applicant.
Idaho	YES	Would be a combination of Primary and Secondary docs containing full name, DOB, and the approval must go through HQ-cannot be approved in field office.
Illinois	YES	It is included in the manual being sent to AAMVA.
Indiana	YES	Exceptions are only allowed for citizens over 65. For them, we are willing to accept Medicare/Medicaid and other documents. A list of these documents is contained on a different list for our examiners/clerks. We will provide this list to AAMVA.
Iowa	YES	Is prescribed in the Examiner's Manual. Exceptions processing requires supervisory approval. Used mostly for older people who may not have a birth certificate and for people who have encountered house fires (these people must go to the vital statistics office and the VS will state that there is no record for the older people). Do not have exception processing for non-citizens.
Kansas	YES	See previous question responses. Do not have exception processing for non-citizens. Not really, other than what is described above. They must meet the same requirements as citizens
Kentucky	YES	We have a tax ID number exception and religious exemption for SSN. Supervisors must review exceptions. Circuit court clerks issue licenses in KY. Non USA citizens are required to go to KY DLD offices to be approved before being sent back to circuit court clerk for licensing. The DL enters all information onto computer.
Louisiana	NO	
Maine		
Maryland	YES	Mainly foreign born. Valid passport with immigration document or valid immigration document. If not able to present than go to list of primary and secondary documents (these documents can be foreign issued).
Massachusetts	NO	
Michigan	YES	We will mail procedures to AAMVA. Exceptions are limited to 2 analysts centrally and 2 people in the field that approve exceptions. Applicants must provide at least one primary document. After that will accept other documents outside of our standard lists.
Minnesota	YES	We have a variance process with forms available. Administrative Rules describes procedures. Process applies to DL and ID cards and also if you don't want photo on license for religious reasons.
Mississippi	NO	The applicant can appeal directly to Major Rigby or Capt. Lockwood, but they don't allow many exceptions.
Missouri	NO	We turn them away if they don't meet our requirements.

SECTION A: The Act requires the development of standards for documentation to be required as proof of identity of an applicant for a driver's license or personal identification card.		
TABLE A-6	Have exception processing for proof of identification procedures	Notes
Jurisdiction		
Montana	YES	Administrative rule. Exception process close to AAMVA 1996 model. Will send copy of rule.
Nebraska	YES	There are management overrides available. Overrides are restricted to approved DL managers and administrators.
Nevada	YES	Only for duplicates, not for renewals
New Hampshire	YES/NO	Do process exceptions but process not in writing. Can only be done by the supervisor of driver licensing or director of motor vehicles.
New Jersey	YES	Regulations allow them to review and approve any case. On a case-by-case basis. Must be done by a supervisor.
New Mexico	NO	
New York	YES	Supervisor can override. Have procedures that the supervisor must follow. Supervisors can override SSN. Override then produces a report that goes to the investigative office.
North Carolina	YES	Only applies to renewals or duplicates where there is information on the system.
North Dakota	NO	If an elderly applicant without documents applies, they are referred to the Chief Examiner who works individually with the family.
Ohio	YES	Ask for alternative documents. We try to be flexible (letter from employer on letterhead). Case by case. Centralized exception process.
Oklahoma	YES	In administrative rule going through supervisor and HQ.
Oregon	YES	Any exceptions to the list of acceptable documents must be made by a Region Manager. The exception process is used in very limited situations when a customer has no means to comply with the required ID. An example is an 80 year old customer who was never issued a birth certificate, therefore can't obtain a birth certificate and only has other limited documents that are not on our list of acceptable documents to meet our minimum standards, but we are satisfied the person is who they say they are.
Pennsylvania	YES	Just for the Amish customers.
Rhode Island		
South Carolina	YES	For people who were born before 1918.
South Dakota	NO	There is a process for dealing with pending applications with Immigration Services.
Tennessee	YES	Only at the central office at the administrative level. Any exception is approved through the central office. Branch offices will fax the documents to the central office and the central office will take steps to verify the documents and applicant before authorizing any exception.
Texas	YES	
Utah	YES	Not in writing. Allow examiner discretion
Vermont	YES	Not written. Supervisor would oversee the exemption process. Use the AAMVA FIPP manual exception processing guidelines.
Virginia	YES	Will send the procedure. If the applicant has official documentation but does not appear on the list, they will make copies and fax to the main office. If approve the exception, they will verify all of the information, they are then authorized to make application using an alternate document to make the application. Approved by the supervisor at headquarters.
Washington	YES	Issue DL marked not valid for ID purposes. Use a tiered approach. ID Reviewer in each office that is the document expert. Can continue to escalate to high level of approval by sending photo image of document-last stop is the special investigations unit. No exceptions for non-citizens.
West Virginia	YES	Can waive certain documents. Translation problems may be cause for exemptions. There are older people who just don't have a birth certificate. They encourage them to get it. If they can't, they ask for documentation for how they can get it. Requires upper level management approval for exemptions.
Wisconsin	YES	It is in our Administrative Rule.
Wyoming	YES	Used rarely. Primarily with vital statistics issues. Older persons may not have birth certificates – ask that they contact vital records to establish a record or that they get a letter stating that a record can not be established. Then use the secondary list in conjunction with the letter from vital statistics.
District of Columbia	YES	Exceptions are processed by the supervisor.
Summary: Most jurisdictions indicated that they have an exception process for proof of identity.		

SECTION A: The Act requires the development of standards for documentation to be required as proof of identity of an applicant for a driver's license or personal identification card.

TABLE A-7	The minimum standard for proof of identity of an applicant for a driver's license or personal identification card should be:
Jurisdiction	
Alabama	We think our promulgated rule for authorized presence should be the bare minimum.
Alaska	DLA/Framework are sufficient.
Arizona	Should use primary and secondary documents. Encourage uniform biometrics
Arkansas	We do support the Framework. We have concerns re: verification of documents. We are okay with the verification requirements as long as it is something we can do accurately, real time so as not to inconvenience customers. We are an instant issue state.
California	The source document used to establish identity should be government issued, original or certified copies, verifiable with the U.S. issuing authority
Colorado	-
Connecticut	Must use a birth certificate and a passport, as well as, other forms of ID should be the minimum.
Delaware	The 1996 standard or the new AAMVA Framework standards. DE has been waiting to see what the national standard will be.
Florida	FL current procedures are very thorough. FL supports the Framework.
Georgia	A standard list of acceptable documents.
Hawaii	We support the framework.
Idaho	Those in Framework.
Illinois	We support the framework. At least one of the documents should be electronically verifiable. We have 5 elements that must be proven. This will usually require at least 3 documents. Name, Date of Birth, SSN, address, signature.
Indiana	We support the Framework.
Iowa	The AAMVA DL/ID Security Framework. Iowa is working towards this standard.
Kansas	Framework/DLA. Should present at least 2 forms of ID and proof of SSN.
Kentucky	We support the Framework. The Framework is good.
Louisiana	We support the Framework.
Maine	
Maryland	At least 2 primary documents of the list. One additional secondary for foreign born and 2 residence documents. MD likes to be structured according to security framework (data elements). Legal presence requirement (tie end of stay).
Massachusetts	Proof of identity should have citizenship or proof of legal status. MA legislators have not been in favor of legal status. For MA to implement there would have to be federal legislation.
Michigan	What is on our DE 40 (our minimum list of documents) should be the standard. We feel there is a level of fraud and counterfeiting of foreign documents so we question whether foreign documents should be accepted on their face at this point. We shouldn't take anything we can't verify.
Minnesota	We feel strongly we would not be able to allow DL and ID cards from other states unless there was a minimal standard that all 50 states agree to as to proof of residency, legal presence and proof of identity. Documents must demonstrate the person is who they say they are. Otherwise we would not accept other state's DL & ID cards as primary documents.
Mississippi	Money and time should be spent on developing a way of verifying birth certificates with state vital statistics agencies. We do not support all standards in the framework.
Missouri	All states need to use the same list. Yes, we support the Framework. We don't know when we can join DLA.
Montana	Procedure in DLA. There are some issues that will have to be worked out. Change of legislation is main issue. Possible change in legislation in 2007 that will allow for MT to sign up for DLA.
Nebraska	We think at least one document including name and date of birth should be required. The document should be US based. There should be consistent requirements between jurisdictions, as well as from document to document. Documents should be verifiable if possible. City and county birth certificates should not be acceptable. The documents should be state issued. There should be a notification process in place, so that if there is a document that is commonly being used for fraud in a jurisdiction, other states are quickly notified. Example: if we started getting a lot of a certain USCIS doc that were fraudulent, the word should get out to jurisdictions quickly.
Nevada	Good as set down in DLA/Framework
New Hampshire	Birth certificates and valid passports should be accepted as proof of identity. Need to have mutually agreed upon breeder documents among all issuing agencies.
New Jersey	NJ likes the six point system which requires the primary source document. Feel comfortable that when they look at that document that the person is who they say they are. This is what the minimum standard should be. Would like to see some type of a biometric, such as a finger print, retinal scan, etc.

SECTION A: The Act requires the development of standards for documentation to be required as proof of identity of an applicant for a driver's license or personal identification card.

TABLE A-7	The minimum standard for proof of identity of an applicant for a driver's license or personal identification card should be:
Jurisdiction	
New Mexico	Proof of name; Proof of date of birth, proof of citizenship status; proof of residency
New York	Should be proof of DOB, name, signature and SSN. Would like to also see address. The national model should require a combination of documents. More than the birth certificate and a SS card. The more documents the better. NY supports the Framework requirements for proof of identification.
North Carolina	What NC currently has and supports the AAMVA Framework. Currently NC accepts another DL as two forms of ID. Are thinking about changing this policy.
North Dakota	We support DLA recommendations At least one primary document should be required if it contains name and DOB. If there has been a name change since birth, we need a court order or government issued marriage certificate.
Ohio	Minimum proof of Name, DOB, SSN and legal presence. Prefer electronic verification. Do support the best practices available (Framework and DLA)
Oklahoma	OK supports implementation of the DLA and its security requirements as the minimum.
Oregon	Customer must show at least one document from our primary list that contains the person's name and date of birth plus two other items from our secondary list. Documents identified as acceptable as a primary document is based on the credibility of the issuing entity, issuance process, security features and the ability to reasonably verify authenticity of the document. Secondary documents standards are less than those of primary documents. Documents on our secondary list are established by credibility of the issuing entity, reasonable issuance process, and ability to recognize document format to reasonably determine authenticity.
Pennsylvania	Look at what PA is sending. This should be used. There should not be a secondary list. Require two proofs of residency.
Rhode Island	
South Carolina	Full name, date of birth, place of birth, gender, age, SSN if available, should be provided for proof of identity.
South Dakota	Acceptable verifiable lists are good. The lists must include instructions on how to deal with Asylees and refugees. This should not be left up to individual states. Instructions should include how to deal with all immigration documents.
Tennessee	Look at what TN currently has in place with the primary and secondary documentation requirements.
Texas	Framework is sufficient. Texas must be sensitive to border so will accept things such as the Mexican Matricula, but only as supporting document.
Utah	Should require two forms of ID, proof of SSN or ITIN
Vermont	US citizens need to provide appropriate documentation such as birth certificates, driver's license, etc. Non-citizens should provide passports, visas, other appropriate immigration documents. For the most part they support the Framework but have concerns with the matrix and the cross reference in how many documents a customer may have to provide. This could impact customer service.
Virginia	At a minimum all jurisdictions should adhere to the same list of acceptable documents and follow the same structure as agreed upon by all jurisdictions. The process by which these are agreed to could be facilitated by AAMVA. Each jurisdiction should have a mechanism in place for exception processing. Neither the specific documents nor the structure of requirements should be federally mandated.
Washington	WA list of documents is sufficient, but differs from AAMVA's resource list-will provide.
West Virginia	We should require a certified birth certificate, SSN, proof of address. For non-citizens all appropriate immigration documents.
Wisconsin	We support the framework. But, it's up to Congress or our legislature to come up with a Legal Presence requirement.
Wyoming	Use of the certified birth certificate and must be an original. Use the exact name as shown on the birth certificate or the immigration document. No copies should be accepted nor hospital records. All states should ask for the birth certificate when they present the out-of-state DL or ID. This would get the name corrected.
District of Columbia	If a person already has a DL, they should need an additional identification document.

Summary: All jurisdictions support the implementation of a standardized list of acceptable documents for proof of identity. Documents should prove (1) name, (2) date-of-birth, (3) Social Security Number and (4) signature. While not agreed upon by all jurisdictions, additional elements could include address and legal presence. Not all jurisdictions feel that the standardized list should be mandated by the federal government. AAMVA could set the standard that jurisdictions would follow. Nearly all jurisdictions feel that the acceptable documents should be verifiable, preferably through electronic means. AAMVA needs to establish a standardized exceptions processing procedure for applicants who cannot meet the identification requirements. A standardized list should be implemented for non-citizens.

SECTION A: The Act requires the development of standards for documentation to be required as proof of identity of an applicant for a driver's license or personal identification card.

TABLE A-8 Jurisdiction	Comments to assist in the development of minimum standards for proof of identity
Alabama	Alabama supports it as a framework. We don't necessarily agree with all of it. We're not going to implement all of it (card specifications for example).
Alaska	-
Arizona	Should use primary and secondary documents. Encourage uniform biometrics
Arkansas	We support the Framework with the caveats mentioned in the previous question.
California	Until all states are in compliance with standard criteria for establishing identity, no other state's DL/ID card should be used to establish identity or legal presence.
Colorado	Framework is good.
Connecticut	Need to standardized birth certificates. Need to continue efforts to enhance the quality of the passport.
Delaware	No foreign documents that cannot be verified. Need to be able to do a system background check on those documents. Should not issue ID cards to illegal aliens. The document should expire the date their legal presence expires. Many states have issued documents to illegal aliens, therefore, we should continue to check name, DOB, etc., for some time now. Need to have an all drivers system.
Florida	Need to have a national database to be able to exchange driver histories and digital photos.
Georgia	There should be a means to verify the documents that would be accepted. DOT needs to consider this and provide funding. Need to minimize the impact on customer service.
Hawaii	We support the framework except for proof of residency and legal presence. These requirements would require federal mandates for us to implement. We will not get uniformity unless it's mandated on the states. Some federal agencies within the states are difficult to work with. The federal government needs to mandate the agencies work cooperatively with the states. Example: Hawaii had initial cooperation with SSA on SSOLV, then no cooperation, then cooperation again. We have no cooperation with INS. We don't know if SSA is checking with INS to check legal presence before issuing SSN. We believe they are supposed to do it, but just don't know. Then, when SSA issues a SSN, we can't be sure the applicant is here legally. These agencies have to be told they have requirements and that they have to have a sense of urgency about it. Example. INS here in HI. The problem we have now with digital image exchange: AK and HI cannot get on digital image exchange. We need a cost effective way to be on it. The digital exchange issue applies to other Pacific island nations/territories too.
Idaho	-
Illinois	We support the framework.
Indiana	-
Iowa	The AAMVA DL/ID Security Framework should be followed for the development of a minimum standard.
Kansas	-
Kentucky	We support the framework. Fraud investigation is an issue needing attention in KY.
Louisiana	-
Maine	
Maryland	See A3.
Massachusetts	MA has a concern about verifying the validity of all documents. This would be very cumbersome. Understand SSA, immigration, etc., can not effectively verify with vital records currently as well as some other documents. Would have a great impact on customer service.
Michigan	Verifiability is the key. Another item is the ability to talk to the issuing authority or have regular communication to keep us updated about their process and procedures. Need to know about changes, particularly within the federal agencies. There needs to be much more verifiability of US birth certificates. We like the idea of AAMVA providing a standard contact list for federal agencies.
Minnesota	-
Mississippi	We do not support all standards in the framework.
Missouri	Yes, we support the Framework. We think there should be fewer secondary proof items. We don't think we should be accepting another state's DL or ID as a source document for proof of DOB. Regarding the new version of Acceptable Verifiable Resource list, it needs to be easier to read. Currently it is not an easy, at-a-glance document. It would be nice if there was an AAMVA published list of points of contacts for specific needs for each state, as well as consulates, etc. (Phone list)
Montana	More user friendly guide for acceptable resource list and some other matrix/templates in the DLA.
Nebraska	If the states are to be held to standards, then it is important for those who issue the breeder documents to have the same standards. The breeder document issuers should be required to input their data into a database that is accessible to the states. For example, birth certificates should be input so states can access them. There should be standardized proof of identification that people should be required to show to the people who issue breeder documents. A good example of the need for this is on Marriage Certificates.

SECTION A: The Act requires the development of standards for documentation to be required as proof of identity of an applicant for a driver's license or personal identification card.	
TABLE A-8	Comments to assist in the development of minimum standards for proof of identity
Jurisdiction	
Nevada	Believe documents should be verified but the process cannot be too costly or time consuming at the counter.
New Hampshire	Need to consider personnel and/or technology issues for the verification of these documents. Will need the right people to validate these documents. Training will be critical. Costs are associated with hiring and training the appropriate personnel.
New Jersey	Any breeder foundation document needs to be improved so the states can rely on those documents. Would like to have electronic communication with the issuers of breeder documents during the point of transaction. The SAVE program is an after the fact tool due to the delays. The documents that have to be reviewed from DHS are hard to review and hard to rely on, due to some of the changes made to the information, or lack portions of names, in order to authenticate and determine what name is to be placed on the DL/ID. It is very inconsistent as far as the standards that are used for the immigration documents depending on where they enter the country. When other documents are issued, the agency may cross out the name and write in the correction. How do you verify or accept these documents. Standards/standards/standards. The overall system can only be as good as the foundations documents that are issued by other agencies, thereby, making a more secure DL/ID.
New Mexico	See A3 and ability to verify person's authenticity when transferring residency from one jurisdiction to another prior to issuing a new ID card or driver license.
New York	Proponents of the points system. Greater emphasis on documents with how they are issued. Greater combination of documents.
North Carolina	Need to have document validation and verification software/systems. Could be used as justification to expand the list of acceptable ID cards as long as you have some way of verifying the documents. The biggest weak link is with the birth certificate.
North Dakota	US resource list in appendix 07-6.2-03 is very good. It would be helpful if there was a list of what the appropriate immigration documents are that need to accompany a valid foreign passport. We need to address the refugee. We would like to see the Canadian Birth Certificate included in the list of resource documents since Canadians do not need a visa to travel to the US.
Ohio	Expansion of SAVE program to verify immigration, EVVER, and other verification capabilities (DOD, DOS)
Oklahoma	Support requirement and standards under DLA and Framework. If requirements are more stringent in security framework the DLA is the guiding principle.
Oregon	We believe the minimum standard should allow states to "accept" foreign documents if specified criteria are met. Because there are states that currently do not have support of their legislature to require legal presence in the United States as an element of the licensing process, we believe the minimum standards need to contain some ability for states to define foreign documents – such as some criteria to make that determination. For example, we work very closely with the Mexican Consulate to identify security features, awareness to their issuance process and the ability to work with them to validate a consulate card. We also have the ability to work with them to help us validate other Mexican foreign documents.
Pennsylvania	Out-of-state licenses should not be used a proof of identity, ID standards for non-US citizens should be tailored to the INS status of the individual, SSN should be required in every jurisdiction.
Rhode Island	
South Carolina	Have a problem with name discrepancies. Immigration documents don't always match what is on the SS card. Need to have better guidelines on name discrepancies. Multi hyphenated names and multi names an issue. This would help to determine if the documents should be accepted. Some may drop their first name and use the middle name. SC requires them to provide a chain of documents to show the tracking of the name differences.
South Dakota	We would like a provision for when a jurisdiction meets the standard after a certain time, that a new jurisdiction can rely on that former jurisdiction's identity process (i.e., reciprocity)
Tennessee	-
Texas	Types of documents will need to be mandated to assist states in being able to refuse certain docs.
Utah	See previous question.
Vermont	Would like to see that there is exemption processing (especially for minors without a prior photo document)
Virginia	-
Washington	-
West Virginia	SSA needs to get people down to one name and one number. Have encountered people with multiple names and numbers. Immigration has been OK to work with but cooperation has been ineffective. Too many inconsistencies. WV employees are trained on document fraud and it is difficult to authenticate the documents. See many federal counterfeit documents.
Wisconsin	-

SECTION A: The Act requires the development of standards for documentation to be required as proof of identity of an applicant for a driver's license or personal identification card.

TABLE A-8 Jurisdiction	Comments to assist in the development of minimum standards for proof of identity
Wyoming	The primary list accepts military documents for identification; WY does not accept the military document for a first time application. Until federal agencies use the same name criteria this will continue to be a problem. All issuers should be utilizing the same name criteria.
District of Columbia	Need to address the exception processing. Make sure that they are clear in the regulations.

Summary: Most jurisdictions support the AAMVA DL/ID Security Framework and the Driver License Agreement. Online verification systems need to be established and improved for the verification of identification documents used in the establishment of an identity.

Section B

The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

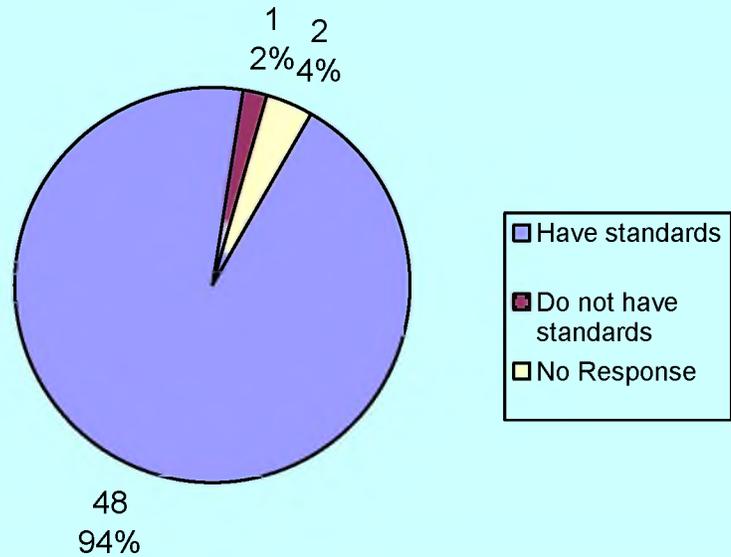
SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-1	Have standards and procedures for verifying the documents used to obtain a DL/ID	Notes
Jurisdiction		
Alabama	YES	
Alaska	YES	
Arizona	YES	
Arkansas	YES	
California	YES	
Colorado	YES	
Connecticut	YES	Have some standards.
Delaware	YES	Is on the web under general requirements.
Florida	YES	Utilize a new system to do checks with SSOLV and NLETS among others.
Georgia	YES	Have worked with the GA Bureau Vital Statistics. Have access to GA records but not other states.
Hawaii	NO	
Idaho	YES	
Illinois	YES	
Indiana	YES	
Iowa	YES	The examiner staff is involved in document verification. All staff are trained on the AAMVA FDR program. Have two pilots with EVVER and Digital Image Exchange.
Kansas	YES	
Kentucky	YES	
Louisiana	YES	We only contact INS by phone if it appears the documents are questionable and/or incomplete.
Maine		
Maryland	YES	
Massachusetts	YES	Inform public that SSN must be verifiable. Is addressed in the training program for employees and provided in the training.
Michigan	YES	
Minnesota	YES	We have procedures as to what to look for on documents to detect fraud.
Mississippi	YES	
Missouri	YES	
Montana	YES	
Nebraska	YES	We utilize FDR training to examine documents.
Nevada	YES	
New Hampshire	YES	Have standard operating procedures for U.S. and non-U.S. citizens.
New Jersey	YES	Depends on the documents that need to be verified. Have procedures in a training manual.
New Mexico	YES	SSOLV
New York	YES	Utilize online verification systems. Field Investigation trains staff on document recognition. Use Lexus Nexus from the investigative aspect.
North Carolina	YES	Verify all SSNs. Other forms of ID are verified if they are questionable. Train examiners to look for problem documents. Legislator is considering a budget increase for document verification software. Hope to have in place by the end of this year a document imaging system. Documents could be emailed to issuer for validation and can be retained for audit and investigation purposes.
North Dakota	YES	SSOLV, PDPS and CDLIS
Ohio	YES	
Oklahoma	YES	
Oregon	YES	We use Docutector to verify document layout and security features. The list of primary documents we accept allow us the ability on a case by case situation to contact the issuing agency and verify the issuance or authenticity of the document.
Pennsylvania	YES	Train examiners to recognize documents, use a training manual to establish the standards. Implemented electronic driver verification system that requires all electronic searches to be completed and retains the results of the search. All electronic checks must be validated to issue a product.

SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-1	Have standards and procedures for verifying the documents used to obtain a DL/ID	Notes
Jurisdiction		
Rhode Island		
South Carolina	YES	Primarily with the use of the SS card. Have in writing for employees. Do a second SSOLV check if there is a change in the name, DOB, etc.
South Dakota	YES	CDLIS. NLETS to check immigration documents for all new HAZMAT endorsed drivers as well as for warrants and we also perform checks on renewal of HAZMAT endorsements for non-citizens.
Tennessee	YES	Procedures are in writing and provided to each employee through a procedures manual.
Texas	YES	
Utah	YES	
Vermont	YES	Working to improve procedures manual. Recently began using SSOLV. Provide a list of the birth numbers issued by each state to all personnel.
Virginia	YES	Address on-line systems and verify with SSOLV.
Washington	YES	
West Virginia	YES	Not in writing.
Wisconsin	YES	
Wyoming	YES	Established with the Driver Examiner Manual.
District of Columbia	YES	

Summary: Most jurisdictions have standards for verifying the documents used to obtain a DL/ID.



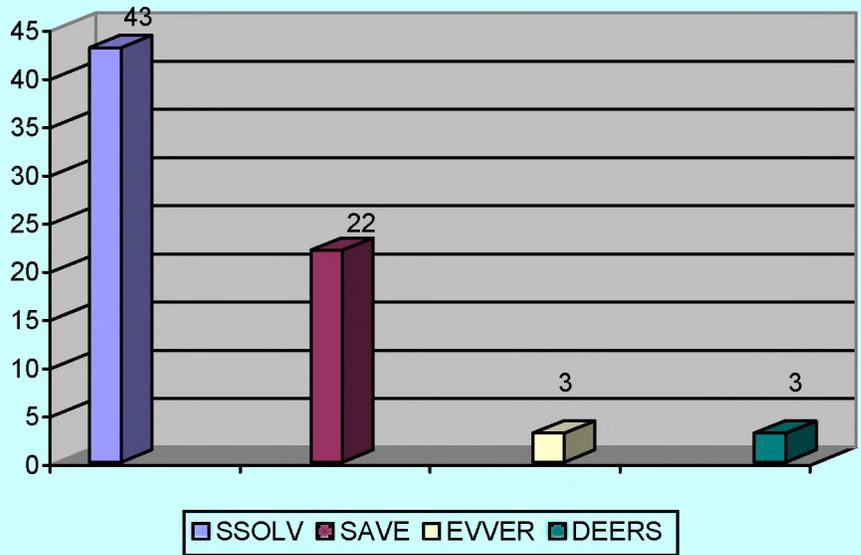
SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-2	Online verification systems currently used (as of February 2005)
Jurisdiction	
Alabama	SSOLV; we do NCIC checks and with implementation of our new driver license systems, we can do immigration checks on every original foreign applicant. The new system should be up no later than this summer (2005).
Alaska	Upgrading system to do this.
Arizona	SSOLV, PDPS, CDLIS
Arkansas	We have a pilot program using SSOLV to batch process verify existing SSN. We expect to implement SSOLV on line. We are also looking at implementing the SAVE system.
California	SAVE, PDPS, CDLIS
Colorado	SSOLV, SAVE, and NCOA are in final steps of implementation.
Connecticut	SSOLV – Have explored using SAVE. Will be doing verification of address very soon. Use FLLQ through NCIC to verify the status of the non-citizen. This is an LE system
Delaware	SSOLV, CDLIS, PDPS and own internal computer system. Check to make sure that there are not two of the same SSNs within their own database.
Florida	SSOLV, SAVE & NDR
Georgia	Use SSOLV
Hawaii	We are trying to get on line SSOLV, but it is on the side pending work on MCSIA. We did use batch SSOLV for all old drivers' SSN verifications. We also did a batch file for HAZMAT endorsements with FBI.
Idaho	SSOLV, SAVE, PDPS, CDLIS, Idaho Telecommunications System
Illinois	SSOLV, SAVE (1/1/05) for those who are legally in the country but ineligible for a SSN.
Indiana	SAVE
Iowa	Iowa has EVVER in pilot stage. Currently do not have others. Want to use SAVE and will be implementing SSOLV. Their issue is that they do not have the IT staff to get these systems implemented, especially with the other pilots in progress. Will have task 9 (state-to-state CDLIS expansion) up by mid March.
Kansas	Use SSOLV, Docutector, ID Checking Guide, and photo verification of all Kansas residents by checking our own photo database.
Kentucky	SSOLV. We're on line with vital statistics in KY. There needs to be a much better address verification system.
Louisiana	SSOLV, NGMV – Will do state to state status checks. We are getting death records from state of LA.
Maine	
Maryland	SSOLV, SAVE, Docutector, Intellicheck When birth certificates do not look right they call.
Massachusetts	SSOLV; Tried to gain access to SAVE but did not due to the backlog that SAVE has been encountering. Vital statistics tends to only be effective in your own state. Need to have improvements with SAVE and vital statistics. Can make phone contacts with state vital statistics offices but takes too much time and is only done when documents are suspected to be fictitious.
Michigan	We will be using SSOLV within the next year. Also we're looking at using SAVE. We use CDLIS & PDPS; Verifications are done through the exception process.
Minnesota	We are not currently using any of the above. We are working on a pilot with vital statistics. We're also working to set up SSOLV eventually. We are now getting batch verification of SSNs that are currently on file. We're looking at other systems but they are very expensive. We are in the process of migrating from mainframe to a client server based system. Consequently, we can't work on any on line systems until that migration is completed.
Mississippi	SSOLV. We can also run NCIC checks.
Missouri	SSOLV. We also use a paper version of SAVE. We will be using electronic version of SAVE by 7/05
Montana	No electronic capability. Do have manual process. SSOLV in batch process.
Nebraska	SSOLV. We completed a pilot with the SAVE program. Probably will wait to implement that one. SAVE program needs revisions so you don't have to mail in so many documents. If we're going to use their data, it needs to be current. Border Patrol is issuing a lot of documents (I94s). USCIS cannot answer questions about those documents because Border Patrol is now in a different agency.
Nevada	SSOLV, BCIS by phone, working on adopting SAVE
New Hampshire	SSOLV and the standard AAMVA applications.
New Jersey	SSOLV, SAVE (more as an exception process)
New Mexico	SSOLV
New York	SSOLV, implement in 02. Do batch verification on SSOLV. Completed full batch in September 04. Use SAVE. Utilize DEERS on a limited base.

SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-2 Jurisdiction	Online verification systems currently used (as of February 2005)
North Carolina	SSOLV. In three months will be marking records for deceased persons with assistant from vital records. Are interested in DEERS and would be interested in participating in a pilot. Have talked with DOD.
North Dakota	SSOLV, PDPS and CDLIS
Ohio	SSOLV
Oklahoma	-
Oregon	We do not use any on-line verification systems named
Pennsylvania	SSOLV, SG search for non-commercial licenses, the Postal Service software for address, PDPS and CDLIS. Are looking at SAVE. Pursuing electronic verification of PA birth certificates.
Rhode Island	
South Carolina	SSOLV, use another BCIS system. With the receipt number from the non-citizen they can check the status.
South Dakota	SSOLV. We are waiting for signed agreement for SAVE within next week or two. We are working on procedures for AAMVA's task 9 – state to state status check. Task 10 EVVER – we received word from AAMVA that our grant is approved. AAMVA is sending it to SD for signature and then we'll start programming for that. We're working on a grant application through AAMVA for task 8 – digital image exchange. We go to US Immigration Services to check on pending applications.
Tennessee	SSOLV. Are considering SAVE but have not moved toward implementation yet. Research has caused concern for the timeliness of the response from SAVE and the costs associated with it.
Texas	SSOLV, EVVER, SSOLV AND BATCH, PDPS, CDLIS, INLETS
Utah	PDPS
Vermont	SSOLOV, CDLIS, PDPS
Virginia	SSOLV – Use DEERS and SAVE through exceptions processing. Are looking into the other systems.
Washington	SSOLV, Docutector, Pitney Bowes Address Verification
West Virginia	SSOLV, would like to do SAVE
Wisconsin	SSOLV will be implemented in 6/05
Wyoming	SSOLV and SAVE. Don't have an electronic system for vital records in WY or with other states. This is needed.
District of Columbia	SSOLV

Summary: Most jurisdictions utilize or anticipate utilizing SSOLV. A variety of other systems are also utilized or anticipated. Jurisdictions have issues with the reliability of SAVE and the verification of vital record events.



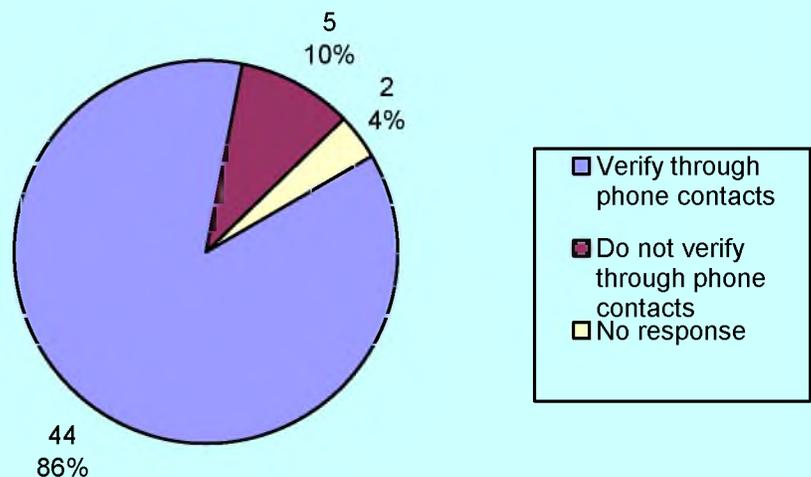
SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-3	Verify other types of documents through telephone contacts	Notes
Jurisdiction		
Alabama	YES	Not routinely, but we have on occasion if documents are questionable.
Alaska	YES	Verify data with BCIS a lot. Do this mostly on potential fraud.
Arizona	YES	Contact immigration office, office of inspector general and the consulate general
Arkansas	NO	Vital Statistics does dump deceased information into the system.
California	YES	The issuing authority of U.S. birth documents may be contacted by phone if the documents appear to be fraudulently issued.
Colorado	YES	When necessary call BCIS and vital statistics.-When necessary, not routine.
Connecticut	YES	Local and regional INS offices on a daily basis.
Delaware	YES	When fraud is suspected. Done by supervisor, Chief of Driver Services, fraud investigators.
Florida	YES	Will contact vital statistics, also BCIS/INS
Georgia	YES	If questionable. Examiners have numbers that they can contact e.g., passport office, INS, etc.
Hawaii	NO	We don't verify documents with issuing agencies. All submitted documents must be original or certified copy. It will remain this way until we get SSOLV.
Idaho	YES	Sometimes call SSA, BCIS, Vital Stats, regarding those docs-this is a rare exception-Don't verify address.
Illinois	NO	
Indiana	YES	Washington D.C. Department of Homeland Security.
Iowa	YES	Utilize a CDL help desk. SSA contacts and INS contacts. Generally with documents they have not seen or they are unfamiliar with. A fraud investigator may make the contact as well as regular staff. Used in exceptions processing. With Vital Statistics they verify over the phone frequently.
Kansas	YES	As needed, will call vital statistics or other states.
Kentucky	YES	For example, we check out utility bills that are used for proof of address. Sometimes, we call other jurisdictions for birth certificate information.
Louisiana	YES	INS documents. We do not have staff to make phone calls. NGMV will have USPS software package to verify whether an address is valid.
Maine		
Maryland	YES	Birth certificates (vital records). State Department (visa, passports), Immigration, embassies from foreign countries.
Massachusetts	YES	Have an office support line and will do so if there are questions on CDLs. Have a special investigative unit that will contact other agencies when they have suspicious documents. The documents are sent to the special investigative unit and they will make the telephone inquires.
Michigan	YES	We contact Immigration. We contact other jurisdictions for birth certificate information occasionally. We request school records, tribal records some times and also contact utility companies and employers.
Minnesota	YES	Immigration and Dept. of Revenue. Admin. Rules require us to verify with issuing jurisdiction in case of questions (If document appears to be altered or fraudulent).
Mississippi	YES	For passports and other INS documents, we call ICE (INS)
Missouri	YES	We call INS, contact other states on birth certificates and have electronic access to our vital statistics data base.
Montana	YES	Immigration, SSA, Vital Statistics done by HQ.
Nebraska	YES	Local CIS office. SSA occasionally.
Nevada	YES	BCIS
New Hampshire	YES	Immigration documents, passports and vital records.
New Jersey	YES	DOD, Vital Statistics, INS, SSA – Generally done on questionable documents or for clarification. Done by a supervisor or a fraud investigator. Will also verify address with appropriate entities.
New Mexico	NO	
New York	YES	DHS, INS, SSA and others.
North Carolina	YES	Will make contacts with INS and others if documents are suspicious. Will also verify school and insurance documents. Sometimes verify I-10s with the IRS but the I-10 is not acceptable as a form of identification. Once you prove your ID then NC asks for the SSN and if you are not eligible you must provide the I-10. The system is programmed to verify that the person is the only person with that number.

SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-3	Verify other types of documents through telephone contacts	Notes
Jurisdiction		
North Dakota	YES	Border Patrol contacts in ND that we call to confirm questionable immigration documents. We have also called other states vital statistics offices to confirm out of state questionable birth certificates.
Ohio	YES	INS documents, employers.
Oklahoma	YES	Contacting INS and SSA if a problem comes, also contact other states on birth certificates. There is a fraud unit in OK that will do further research.
Oregon	YES	The list of primary documents we accept allow us the ability on a case by case situation to contact the issuing agency and verify the issuance or authenticity of the document.
Pennsylvania	YES	Do so with questionable documents or any anomaly in the document. Have a procedure to contact INS and others. Done so through a central group.
Rhode Island		
South Carolina	YES	If they suspect that there is fraud will contact vital statistics offices, DHS, SSA and others. Done by the fraud unit. The non-citizen process is centralized. Issue a temporary and then a DL is issued once authorized.
South Dakota	YES	We call on whatever we need to. Most frequent calling is on immigration documents. We have to call SSA some times. We call Vital Records on birth certificates if need be.
Tennessee	YES	With local BCIS office and others when TN does exceptions and has suspicions of fraud. Contacts are made by the director level or a manager.
Texas	YES	On exception will call county registrar, vital stats
Utah	NO	
Vermont	YES	Will call border patrol and DHS, passport and visas, immigration documents; if documents are suspected to be fraudulent and for all foreign applicants. The foreign applicants are done after the fact by a supervisor. Others done by supervisor as well.
Virginia	YES	Done through the exception process or questionable documents. Primarily birth and name change documents. Also with immigration documents. Will also contact DOS on passports.
Washington	YES	As needed with SSA, INS, VITAL STATS
West Virginia	YES	Contact INS, state vital records office, other states agencies. 80% of the time is due to suspicious documents and the rest to provide assistance to the customers who have difficulties.
Wisconsin	YES	BCIS discontinued the phone verification because of resource losses - DLM 215.92 discontinued.
Wyoming	YES	With vital records in suspicious cases.
District of Columbia	YES	For proof of residence. Will contact the landlord for renters. Will make contacts to immigration and others.

Summary: A majority of jurisdictions verify documents through telephone contacts, usually when processing non-U.S. citizens and when fraudulent activity is suspected. To verify all documents though telephone contacts is too time consuming.



SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-4	Provide for data sharing between law enforcement and motor vehicle administrations, including but not limited to, exchanges of digital photo and driver records	Notes
Jurisdiction		
Alabama	YES	
Alaska	YES	As much as possible
Arizona	YES	Do not share digital photos with other MVAs.
Arkansas	YES	We have our crime information organization which accesses our data base to get digital photo and driver records.
California	YES	Law enforcement can obtain information from our database through the CLETS system or by requesting information directly through a specific DMV unit. Additionally, photos can be obtained through local law enforcement systems or by requesting photo histories from DMV headquarters. We will share some information on the driver record with other jurisdictions if they inquire.
Colorado	YES/NO	Not electronically at this time-will verify information if formally requested. Considering involvement in a digital photo exchange Digimarc is under discussion.
Connecticut	YES	On an inquiry bases for LE. LE has unlimited read only access to the driving record. Also share with Federal LE.
Delaware	YES	Can share with all LE. Can provide images to DE LE at the patrol car. Have provided photos to other jurisdictions through LE. DE LE has the images and can share with other LEs.
Florida	YES	Only within FL
Georgia	YES/NO	Yes to LE and no do DMVs
Hawaii	YES	They have access to our information.
Idaho	YES	Share with Law Enforcement and other state DMVs.
Illinois	YES	We have (Law Enforcement Agency Data System) LEADS over which text data is shared. Photo access is extremely limited and not electronic (by mail). We plan to have electronic photo image sharing by the end of 2005.
Indiana	YES	Law enforcement request images though our state police. The image is provided electronically. Driver records are also provided electronically. Our new computer system will provide better law enforcement access.
Iowa	YES	
Kansas	YES	
Kentucky	YES	
Louisiana	YES	Law enforcement can request copies of photos. Some law enforcement has direct on line access; others by fax or email requests. The same is true for driver records.
Maine		
Maryland	YES	Fax with LE. Work with MD Homeland Security office to get direct access. Additional programs for people that are authorized to obtain access, DARS: direct access. Under state and federal law. LMS license monitor system: authorized to get specific data (contract-billing) employers.
Massachusetts	YES	Can share outside of MA. Are involved in the Digital Image Exchange Pilot. Exchange with neighboring states as well. Can share the digitized images with MA LE.
Michigan	YES	MI state police have access to digital images and DL records. Records are available subject to DPPA. Records are available to other jurisdictions excluding digital photo.
Minnesota	YES	We exchange information via a law enforcement website showing photos, and we also share with our criminal justice association. We share with law enforcement, all of the driver history except medical information and social security number (except for investigative purposes depending on statutory authority)

SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

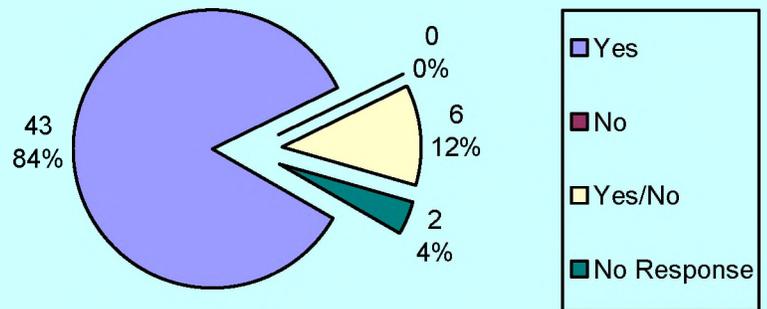
TABLE B-4	Provide for data sharing between law enforcement and motor vehicle administrations, including but not limited to, exchanges of digital photo and driver records	Notes
Jurisdiction		
Mississippi	YES/NO	No, not photos. We do share records.
Missouri	YES	We have ability to provide it but that doesn't mean law enforcement has the capability to receive it. One major population center has the ability technologically to receive electronic photos. All law enforcement can get photos manually. Everybody gets the history. DPPA dictates who can get personal information.
Montana	YES/NO	Yes on records but not on digital photo (1 by 1 request by LE or DMVs through business desk – through CJIN limited capability). Law restricts use of photo and SSN.
Nebraska	YES	
Nevada	YES	With law enforcement. Secure email to exchange photo. Use NLETS for data.
New Hampshire	YES	Very controlled. Only one person can transfer the images between agencies. Can share outside of NH.
New Jersey	YES	Not electronically sharing digital images. Will soon with LE only in NJ.
New Mexico	YES	
New York	YES	To the extent possible. Provide images based on court orders. Can also provide based on terrorism related activities.
North Carolina	YES	State law allows NC to exchange digital photos with LE but does not address other state agencies.
North Dakota	YES	Digital photo and driver records.
Ohio	YES	Allowed to share with any LE and courts. MVAs can receive photo through LE. Records direct.
Oklahoma	YES	Exchange digital image through restricted process.
Oregon	YES	Law enforcement has access to our Driver records through LEDS and our digital photos through WINPHO. We do not allow exchange of digital photos with other motor vehicle agencies. Only law enforcement officials and Oregon DMV employees have access to our digital photos in the course of their jobs.
Pennsylvania	YES	Law allows them to share with LE the records and images. Can share with any law enforcement agency. Share with state DMVs but cannot exchange digital photo at this time.
Rhode Island		
South Carolina	YES	Can share with all LE with the State Investigative Bureau. Will be improving this system soon. CICS mainframe and they do not get the photo. Selected state and federal agencies get photo web services (XML format), through a browser.
South Dakota	YES	We share the photo with law enforcement only; We share records with law enforcement and other jurisdiction driver license agencies.
Tennessee	YES	Can share outside of TN but not electronically. Will fax information and photo to agencies outside of TN.
Texas	YES	Share driver record with law enforcement and MVAs. Share photo with law enforcement only.
Utah	YES	Law enforcement has access to digital photos and driver record. MVAs can obtain information upon request.
Vermont	YES/ NO	Right now the system can fax photos and print. Will eventually be able to transmit electronically. VT LE has access to the system. Are on CDLIS and AAMVA network.
Virginia	YES	Can share with LE outside of VA. Do not share the digital photos but can request through investigative services and a photo can be faxed.
Washington	YES/NO	Do not exchange digital photo. Do not provide other info to law enforcement-only release hardcopy photo if criminal investigation.
West Virginia	YES	Can share outside of WV with LE. AAMVA should develop a contact list for each state to get a photo of a person.

SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-4	Provide for data sharing between law enforcement and motor vehicle administrations, including but not limited to, exchanges of digital photo and driver records	Notes
Jurisdiction		
Wisconsin	YES	Law enforcement must follow an administrative process to request photos. We do not share signature except by court order. We do not share medical information. We can cut and paste and email the photo or fax it. Law enforcement can access DL records except medical information and SSN. This is an electronic inquiry.
Wyoming	YES	Photo, driver histories, etc., upon written request.
District of Columbia	YES	Can share outside D.C.

Standards to confiscate documents are as strict as the Act

Summary: Most jurisdictions provide for data sharing between law enforcement and motor vehicle administrations, including but not limited to, exchanges of digital photo and driver records? Some are not permitted to share outside of jurisdictional borders.



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SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-5	Employ technology to capture digital images of identity source documents so that the images can be retained in electronic storage in a transferable format	Notes
Jurisdiction		
Alabama	YES	
Alaska	N/A	
Arizona	YES	
Arkansas	NO	We don't capture them
California	NO	
Colorado	YES/NO	Working on it.
Connecticut	NO	Not at the present time but are considering implementing. Is a technology issue. Need more capacity.
Delaware	NO	But would like to see the capture of digital images of all source documents.
Florida	YES	Scan documents for immigrants and non-immigrants and in cases of questionable documents. Made available to LE.
Georgia	NO	Will be a part of the new system.
Hawaii	NO	
Idaho	YES	
Illinois	NO	
Indiana	NO	Identity documents are copied at the front counter and sent to the central office where they are microfilmed.
Iowa	YES	Iowa has the ability and in some exceptions cases they do. Not done for all documents and all customers though. Iowa has a central document imaging system. Can enter the documents into the system easier by scanner or fax.
Kansas	NO	
Kentucky	NO	
Louisiana	NO	In NGMV, the plan is to scan source documents at the point they are furnished.
Maine		
Maryland	YES	System does not allow information to be emailed. All foreign documents and exception process.
Massachusetts	N/A	Make paper copies of all source documents for 1st time applicants and conversions.
Michigan	NO	
Minnesota	YES	
Mississippi	YES/NO	For some documents (name changes – we scan the court documents, we scan school attendance forms). Applications with birth certificate information written on them are also imaged. Not all source documents are imaged.
Missouri	NO	We have plans to do it in the future. If paper documents (copies) are sent to central office, they are scanned and imaged.
Montana	NO	
Nebraska	NO	We input the type of ID doc with numbers into the system and retain it
Nevada	NO	
New Hampshire	NO	
New Jersey	NO	Would like to.
New Mexico	NO	
New York	NO	Would be a challenge for NY. NY reviews all documents through a central issuance process.
North Carolina	YES/NO	Not currently but will soon.
North Dakota	NO	
Ohio	NO	
Oklahoma	NO	
Oregon	NO	
Pennsylvania	NO	Documents are photo copied and retained on microfilm.
Rhode Island		
South Carolina	YES	Only for non-citizens

SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-5	Employ technology to capture digital images of identity source documents so that the images can be retained in electronic storage in a transferable format	Notes
Jurisdiction		
South Dakota	YES	For all immigration documents and for all documents presented by HAZMAT applicants. We scan and store in documents imaging systems.
Tennessee	NO	Not at the time, but developing.
Texas	YES	Only photocopy source docs and then send to HQ for microfilming.
Utah	NO	It would be a huge expense
Vermont	YES	Not sure if they are in electronic transferable format.
Virginia	NO	Not currently but are working on being able too. Are currently working on the requirements for the RFP.
Washington	YES	Image photocopies of questionable documents
West Virginia	YES	
Wisconsin	NO	Applications will be scanned when US PATRIOT Act is implemented.
Wyoming	NO	Will micro film if WY makes copies.
District of Columbia	NO	

Summary: Roughly, half of the jurisdictions employ technology to capture digital images of identity source documents so that the images can be retained in electronic storage in a transferable format.

SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-6	Retention period for paper copies of source documents	Notes
Jurisdiction		
Alabama	No Retention	Source documents are scanned at the front counter. Foreign nationals are processed only at 6 district offices, not at all offices.
Alaska	No Retention	
Arizona	10 years	10 yrs. Scanning documents now, but going to imaging system
Arkansas	N/A	
California	No retention	
Colorado	No retention	Microfilm and destroy paper
Connecticut	5 years	
Delaware	3 Years	The application is kept for three years. Then imaged and destroyed. Applications are kept via electronic image and will be kept forever. Can be used in court. Do not capture other source documents. In the plan to begin doing so.
Florida	N/A	
Georgia	N/A	
Hawaii	N/A	We do not retain documents. Birth certificates and Social Security cards are given back to the applicant. Surrendered driver licenses are returned to the issuing state. If we get a requested verification from the other state, it is attached to the application, filmed and destroyed one year after application.
Idaho	10 years	
Illinois	N/A	We do not retain copies of paper source documents.
Indiana	N/A	They are not retained. They are microfilmed and film is retained. The documents are destroyed after filming.
Iowa	N/A	Iowa does not keep paper copies of source documents. Will be done as a part of the system redesign. Considering 10 years.
Kansas	N/A	Only retain them if further verification is needed then they are destroyed if bad, returned to customer if good.
Kentucky	10 years	Non – US citizens are the only ones we collect paper copies for. They are microfilmed. We think they will be retained for 10 years. To be determined.
Louisiana	N/A	NGMV will eliminate the need to keep paper documents.
Maine		
Maryland	No Limit	Forever. Moved to archive. New system is electronic (2 years ago). Prior to that there were 0 copies, only information on application.
Massachusetts	7 years	
Michigan	2 years	We also keep declaration sheets 2 years.
Minnesota	90 days	We retain them until they have been imaged – minimum of 90 days. Documents (are photocopied upon application) are destroyed after imaging.
Mississippi	N/A	We don't retain paper copies. Once scanned at headquarters, paper documents are destroyed.
Missouri	1-2 weeks	They are destroyed after imaging and verification that the image is okay (one to two weeks).
Montana	No retention period.	
Nebraska	N/A	
Nevada	Indefinitely	Scan application onto CD and those are kept indefinitely. Do not scan source documents.
New Hampshire	5 years	5 years and archived
New Jersey	N/A	Do not make copies of source documents
New Mexico	25 years	
New York	N/A	Do not make copies.
North Carolina	7-10 years	
North Dakota	N/A	We don't retain them.
Ohio	7 years	
Oklahoma	N/A	
Oregon	No retention	We don't keep paper copies of source documents

SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-6	Retention period for paper copies of source documents	Notes
Jurisdiction		
Pennsylvania	N/A	Until the paper is microfilmed then paper is destroyed.
Rhode Island		
South Carolina	N/A	Scan everything and then destroy paper documents.
South Dakota	30 Days	Approximately 30 days (time it takes to scan and process)
Tennessee	N/A	Do not retain paper copies.
Texas	No retention	
Utah	No retention	
Vermont	2 years	
Virginia	No retention	
Washington	No retention	
West Virginia	N/A	Paper documents are scanned into the system and then shredded.
Wisconsin	N/A	They are not retained.
Wyoming	Indefinitely	On microfilm
District of Columbia	N/A	Keep the paper for a number of years and are imaged right away by a contractor. The hard copies are then retained by the contractor.

Summary: Retention periods for paper copies of source documents varies from none to indefinite.

SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-7	Retention periods for images of source documents	Notes
Jurisdiction		
Alabama	Forever	
Alaska	N/A	
Arizona	N/A	Under consideration
Arkansas	N/A	
California	No retention	
Colorado	Indefinitely	
Connecticut	N/A	
Delaware	N/A	
Florida	As long as there is an active record.	
Georgia	-	
Hawaii	N/A	
Idaho	At least 10 years	
Illinois	N/A	
Indiana	N/A	
Iowa	No limit	Iowa started capturing in 1989. Are still keeping them all. When Iowa establishes purge criteria it will be the same as paper documents (10 years).
Kansas	N/A	See previous question.
Kentucky	N/A	
Louisiana	N/A	Under NGMV: we don't know retention schedule
Maine		
Maryland	Forever	
Massachusetts	N/A	
Michigan	No retention	
Minnesota	7 years	
Mississippi	Life	
Missouri	6 years	
Montana	No retention.	
Nebraska	N/A	
Nevada	N/A	Do not image source docs.
New Hampshire	Indefinitely	NH will microfiche documents and applications and will retain indefinitely.
New Jersey	N/A	
New Mexico	N/A	
New York	N/A	
North Carolina	10 years	NC microfilms CDL applications and retains them for 10 years. With the new system will be 10 years.
North Dakota	N/A	We don't take images of source documents. We do have a document imaging system in place but it is not feasible to support it at all locations.
Ohio	N/A	
Oklahoma	N/A	
Oregon	N/A	We do not retain images of source documents other than the application
Pennsylvania	Indefinitely	Microfilm is retained indefinitely. Do not purge microfilm.
Rhode Island		
South Carolina	Indefinitely	
South Dakota	No limit	Indefinitely
Tennessee	N/A	Retain micro-film of the application.
Texas	125 years	
Utah	No retention	Don't image source documents
Vermont	Indefinitely	
Virginia	10 years	Retain the application on microfilm for 10 years. Will retain the source documents in the near future.

SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-7	Retention periods for images of source documents	Notes
Jurisdiction		
Washington	6 years	
West Virginia	Indefinitely	All images are certified and can be used in a court of law. Scanned copies of signatures are problematic for hand writing analysis. Can be used in a court of law.
Wisconsin	N/A	Not retained
Wyoming	Indefinitely	On microfilm
District of Columbia	Indefinitely	

Summary: Retention periods for images of source documents various from none to indefinite.

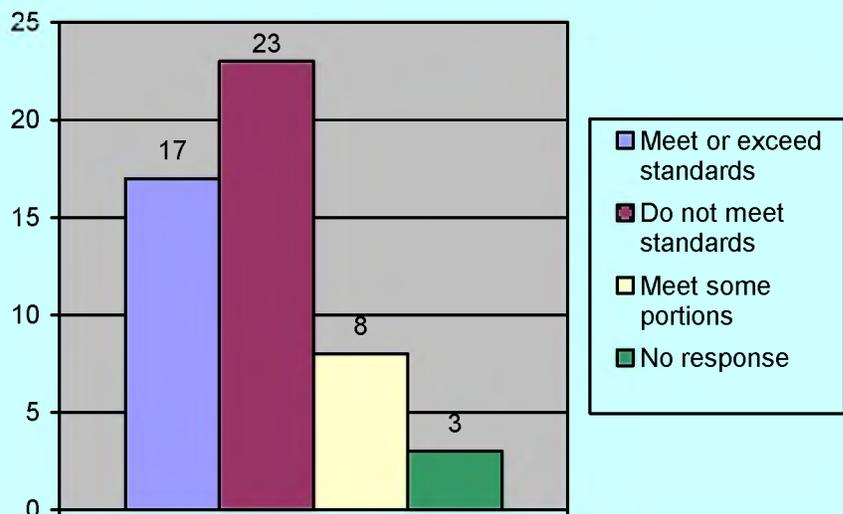
SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-8	Standards and procedures meet or exceed the requirements developed by the DLA and AAMVA Security Framework	Notes
Jurisdiction		
Alabama	YES	We believe that we exceed them.
Alaska	NO	Only PDPS and CDLIS
Arizona	YES	But need to implement a new residency definition. Require all states to participate (including states and territories) homeland security, state and federal agencies, vital statistics.
Arkansas	NO	
California	YES	
Colorado	-	
Connecticut	YES/NO	Continue to make improvements. Issues with really determining if an applicant has a license in another state without DRIVeRS.
Delaware	YES/NO	Partially in compliance. DE has the capability to do the unique identifier.
Florida	YES	
Georgia	NO	Need to add more systems checks for verification.
Hawaii	NO	Not all of them.
Idaho	YES	
Illinois	YES/NO	7. Verification process: No; We need DRIVeRS to verify out of state licenses; 8. and 9. YES
Indiana	NO	We are not using SSOLV. We do use INFO Search which provides a list of 'hits' for SSN matches.
Iowa	NO	Not yet but are currently working towards the standards. Have new DL/ID issuance system in development which will be implemented in one year and will be designed to accommodate every online verification system.
Kansas	YES	Yes, except don't yet use SAVE
Kentucky	NO	
Louisiana	YES	We cannot verify any out-of-state documents other than a state issued ID/DL. No national network to verify out-of-state birth certificates and/or death records.
Maine		
Maryland	YES	Overall yes. But some practices should be more stringent.
Massachusetts	YES/NO	MA continues to make improvements.
Michigan	NO	
Minnesota	YES	We believe we meet AAMVA standards.
Mississippi	NO	I personally think they meet them, but we don't use the (DLA) Acceptable, Verifiable Resource Lists.
Missouri	NO	We do not use Acceptable Verifiable Resource List. We do not electronically verify all documents.
Montana	NO	
Nebraska	NO	We need DRIVeRS. We need more data bases to check breeder documents. Our ID list does not conform to the framework.
Nevada	YES	Mostly
New Hampshire	YES	
New Jersey	YES	Close, do not check with other jurisdictions on DL/ID yet.
New Mexico	NO	AAMVA attempting to define minimum acceptable standards and to standardize and reduce wide variance between jurisdictions. Once minimums and a standard format are implemented among jurisdictions, things will improve
New York	YES	To the greatest extent possible. Don't use EVVER.
North Carolina	YES	NC is continuing to enhance on-line verification systems. Would also like to be able to access SAVE. NC would like to use SAVE if it were more reliable, accurate and more cost feasible.
North Dakota	NO	1. We make a visual exam, of the documents by utilizing the AAMVA FDR Training and various ID checking guides. 2. We check the SSN through SSOLV. 3. We do not electronically check birth certificates immigration documents and address. 4. We do require the surrender of an out of state and out of country license prior to issuance of a ND license. If the applicant says they used to have a license in another state, they must provide that driver ID number. The number is then entered on record and a driver history is run to confirm the number. We don't technically do #7 unless the driver tells us (systems not currently available). We do not meet # 7. We do meet 8 and 9.

SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-8	Standards and procedures meet or exceed the requirements developed by the DLA and AAMVA Security Framework	Notes
Jurisdiction		
Ohio	YES	Minimum proof of Name, DOB, SSN and legal presence. Prefer electronic verification of these elements. Verification of security features. Electronic verification at source.
Oklahoma	NO	Not across the board. Some parts are in compliance.
Oregon	NO	
Pennsylvania	YES/NO	There are no states that can say that they meet this standard without the use of a non-commercial driver pointer system.
Rhode Island		
South Carolina	NO	Working to make improvements based on the technologies available.
South Dakota	YES	Requirement #7 - we follow the definition of residency; We feel we need DRIVERs for #7; we have not adopted Acceptable Verifiable Resource list; We don't verify address. We do verify all other components.
Tennessee	YES	TN continues to work towards meeting the standard.
Texas	NO	Don't meet resource list. Need DRIVERs to allow verification with other states.
Utah	NO	Our document list is different.
Vermont	NO	Working to improve their standards and to incorporate the DL/ID Framework. Need to have DRIVERs.
Virginia	YES/NO	The Framework requires all of the verification system and VA does not currently have access to all systems. Are also looking at the Acceptable Verifiable Recourse Lists. VA continues to make improvements.
Washington	NO	Resource docs list is different.
West Virginia	YES/NO	Hard to verify all documents. Would like to use SAVE. Are working to improve verification systems.
Wisconsin	NO	
Wyoming	YES/NO	Do not verify with all documents. Need to have on-line systems for all vital records. Also need to have DRIVERs. Can also be time consuming to do verification. Need to have real-time verification systems.
District of Columbia	YES	

Summary: A majority of the jurisdictions do not meet the standards developed in the DLA or the AAMVA Security Framework.



SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-9	The minimum standard for verifiability of documents used for proof of identity for driver's licenses and personal identification cards should be:
Jurisdiction	
Alabama	Birth certificate and Social Security card for US citizens. Verification of birth certificate would be an ideal. That is a long term problem with a long term solution (16 years). We can't afford to pick up the phone to call and verify every birth certificate.
Alaska	DLA/Framework are sufficient
Arizona	Must do electronic verification
Arkansas	We support the Framework. We're especially concerned about how to verify birth certificates. We do not currently issue temporary licenses pending verifications. If we cannot do an instant issue, we have costs involved for a mail out system for some people, and we would have to adopt a temporary license system.
California	All states should verify U.S. birth documents through an automated system, when such system is available. All states should verify U.S. issued immigration documents through DHS.
Colorado	Those in Framework-Electronic is ideal.
Connecticut	Must have original valid documents. You cannot totally rely on the documents themselves. Need to be able to verify the documents.
Delaware	Verify as much data as you can. Do not accept foreign documents. Do not give documents to illegal aliens. Tie expiration to the end of stay.
Florida	Due to the unreliability of birth certificates, you need to ask what is verifiable. Need to have systems to be able to verify that the document is genuine and has been issued. Address verification could be useful.
Georgia	All documents accepted should be verifiable through electronic means.
Hawaii	SSN verification using SSOLV. We should verify also with vital records. DRIVeRS is required along with digital image exchange for effective verifications.
Idaho	Same as Framework
Illinois	At least one should be electronically verifiable with the issuing source. We need to establish relationships with issuing authorities (DHS). Those organizations need to be ready for us and help us.
Indiana	We support the Framework.
Iowa	The AAMVA DL/ID Security Framework. Iowa is working towards this standard.
Kansas	Electronic verification whenever possible. Ability to verify birth documents electronically
Kentucky	We support the Framework.
Louisiana	We support the framework. DRIVeRS is needed.
Maine	
Maryland	Verifiable security features. Electronic verification at source should become requirement.
Massachusetts	If states are going to be required to verify it must be that verification is required only if it is available on-line. Not all documents can be verified but those that can, should be. Cannot contact all sources to verify. On-line systems also need to be effective and timely to support real-time transactions. Have had problems with SSA when MA first went on-line. Don't want to have to send customers away.
Michigan	Electronic verifications as mentioned in the framework. There doesn't seem to be any uniformity between jurisdictions on marriage licenses. That should be pursued in order to verify identity.
Minnesota	We support the Framework. If we think the document is suspect there should be some way to verify the document.
Mississippi	Applicants must be a US citizen before obtaining a DL or ID card, period. There should be stricter US residency laws and stricter immigration laws. If you are not legally here for over one year, you shouldn't be able to get a license at all.
Missouri	Verifiability is a big chunk of DLA. If you can verify 2 of 3 source documents, and that is sufficient for DLA, that would go a long way in helping states join. General consensus, until there is a true biometric, there is no sure way to tell who a person is.
Montana	Yes - No system (red light/green light). As simple as possible. Changes are expensive for MT to develop electronic verification capability. MT does support the AAMVA DL/ID Security Framework.
Nebraska	We think electronic verification of breeder documents is essential. We should be required to deny issuance if the documents are not verified. All front line staff in all states should have extensive fraud training. We support the framework.
Nevada	They need to be reasonable.
New Hampshire	SSOLV should be a minimum standard. The standard should require two online verification applications. Support the AAMVA Security Framework.
New Jersey	With the ideal data base all documents would be verifiable. If all documents were trustworthy there would not be as great a need for electronic verifiability in every transaction. States need to have more confidence in all documents. The primary documents should be verifiable through electronic means.

SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-9	The minimum standard for verifiability of documents used for proof of identity for driver's licenses and personal identification cards should be:
Jurisdiction	
New Mexico	See A3
New York	Would like to see all documents being verifiable through systems. All of the data elements should be verified. At a minimum there should be SS verification and verification of vital records and out of state licenses. Support what is in the Framework.
North Carolina	Need to have standards for validating the document. The standard should be that a state makes a reasonable effort to validate. States cannot govern all of the documents that are issued. If states have to make calls to validate the documents the system will not be successful. To recognize other states DLs there needs to be a drivers systems and image exchange.
North Dakota	1. There should be a visual examination. Front line examiners need to be able to recognize alterations and counterfeits and imposters. 2. Machine readable and uniform features that examiners can efficiently use and recognize at the front counter. 3. Efficient electronic verification of birth certificates and immigration documents.
Ohio	See A2
Oklahoma	DLA standards.
Oregon	Without legislative support and the funds to develop and pay ongoing costs for any electronic system, we believe our standards are reasonable
Pennsylvania	All states should use SSOLV, state-to-state searches for licenses transferred, CDLIS and PDPS.
Rhode Island	
South Carolina	Need to have systems to do electronic verification, such as with birth certificates. No way to determine that a person doesn't have a DL or ID in another state.
South Dakota	We need DRIVeRS. We do support the idea of the Framework. The Framework is the minimum standard as long as immigration documents are addressed (see previous comments)
Tennessee	Agree with the DL/ID Framework and the DLA.
Texas	SSOLV, DRIVeRS, SAVE, Birth Document Verification System
Utah	-
Vermont	Need to have on-line access of other entities to verify the documents.
Virginia	
Washington	Should only have to verify questionable documents.
West Virginia	All documents should be certified and no photo copies. Don't accept hospital birth certificates. Should be on security paper. Support what is in the Framework.
Wisconsin	Everyone should verify the SSN and INS documents. Birth certificate verification would be nice. We would like to have DRIVeRS in order to verify validity of the driver license or ID card.
Wyoming	States should verify against documents that have electronic verification; real-time transaction. If it is not available through electronic verification, states should not be required to verify that document.
District of Columbia	Agree with the AAMVA Framework.

Summary: Most jurisdictions support the *AAMVA Security Framework* and the Driver License Agreement. The jurisdictions feel that real-time, online verification is critical. The correctness of information received from the source is also vitally important.

Improvements must be made to vital records verification. Some improvement need to be made with SAVE and SSOLV. The creation of an all-driver-pointer system is a must for states to be able to verify if a person has been licensed in another state.

Standards need to be set for all online verification systems to interact as effectively as possible.

Jurisdictions should only accept original documents.

SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-10 Jurisdiction	Comments to assist in the development of minimum standards for verifiability of documents
Alabama	If the Framework and fraudulent document training are there, it's very positive and good. We think NCIC is another tool everyone should use – to find out whether the applicant is who they say they are and whether they have warrants. This should be a federal requirement.
Alaska	-
Arizona	See previous question
Arkansas	We support the Framework. Our difference is the part within the Framework about 'reasonable' verification.
California	Nothing further
Colorado	-
Connecticut	Need DRIVeRS system. Need standards for birth certificates and to be able to verify with the source its accuracy. Make it so SSA issues only one number to a person and that they update their records sooner than 6-8 weeks. Digital image exchange should be made available.
Delaware	Need to look at being able to scan the documents and to place the document on a live system. To be able to scan a document or an application and to transfer them onto another jurisdiction. Need to have the ability to capture some type of biometric identifier.
Florida	-
Georgia	Some type of biometric needs to be included in the process. Have problems with people selling their identities. The documents may be good but the person might not be the lawful holder of the documents. Need to be able to tie the driver to the record through biometrics.
Hawaii	-
Idaho	Uniformly require issuance to residents in home state-don't issue an Oregon License to someone with an Idaho address. Require legal presence and tie to expiration-Use full legal name. All things set down in Framework
Illinois	Send money. We support the framework.
Indiana	-
Iowa	The AAMVA DL/ID Security Framework should be followed for the development of a minimum standard.
Kansas	-
Kentucky	Tapping into financial information might be another helpful means of verifying information (credit cards, credit histories, etc.) The AAMVA framework is very good. We need to pursue that in reasonable terms. Address information is something we have spent a lot of time discussing.
Louisiana	We need DRIVeRS. We need a nationwide birth and death records system. We cannot verify out of state documents presently.
Maine	
Maryland	Security Framework is excellent. Main document for identity should also establish legal presence.
Massachusetts	Need to improve current systems and establish standards for new systems that are developed. Need to have funding to support on-line verification systems. Costs per transactions need to be feasible.
Michigan	We need a means of standardizing birth, death and marriage certificates. We also need a means of learning of out of state death of a resident. For residency, we need a means of verifying utility information and address information to learn, "Is this a residence address?" In addition to standardizing, we need a means of verifying.
Minnesota	We support the Framework. See prior answers for minimal standards. All states must agree to minimum standards for proof of residency and legal presence.
Mississippi	We don't support the entire Framework.
Missouri	We do support the Framework.
Montana	-
Nebraska	DLA should require all states to follow the same standards. There should be frequent peer review with appropriate penalties imposed. We support the framework.
Nevada	-
New Hampshire	Funding needs to be provided to support verification process.
New Jersey	Need to increase the trustworthiness of the underlying documents. Need to look at the use of the digital watermark on all documents and to have appropriate software provided to read the watermark. The issue of residency needs to be looked at and better defined.
New Mexico	Minimum list of acceptable documents; Standardized driver's license/ID card format with minimum list of Level 1,2, &3 security features.
New York	Need to have sufficient verification tools for the jurisdictions to utilize.
North Carolina	Vital records needs to have an improved system. Vital records needs to be improved. Birth certificates are a common form of fraudulent document.

SECTION B: The Act requires the development of standards for the verifiability of documents used to obtain a driver's license or personal identification card.

TABLE B-10	Comments to assist in the development of minimum standards for verifiability of documents
Jurisdiction	
North Dakota	The weak links in this are the various court documents for name changes, adoptions, etc. Numerous documents and seals all look different. How do you verify these?
Ohio	Support the Framework.
Oklahoma	Finalization and adoption of DLA.
Oregon	We believe jurisdictions should have at least 4-5 years to meet minimum standards for verifying ID documents through electronic means.
Pennsylvania	Electronic verification of birth certificates, and improved SAVE systems that can be integrated in the processing system, non-commercial driver pointer system to deter identity theft. Potentially facial recognition or other biometric. Must take into account the time to implement and funding. Also take into account for newly issued document (only apply to newly issued license/day-forward) a starting point.
Rhode Island	
South Carolina	Need to have the systems, time to get it done and the funding to do so.
South Dakota	We support the Framework
Tennessee	Would like to see more documents that can be effectively verified on-line. Some current systems need to be improved. More information needs to be shared with/by the SSA.
Texas	-
Utah	-
Vermont	Need for electronic verification and need to have funding for DRIVeRS. A small state like Vermont will need to have funding in order to implement minimum requirements for verification. Need funding to support requirements.
Virginia	Identity documents should be verified through physical inspection at the point of service to determine authenticity. If there is a question of authenticity or a question as to whether the document is acceptable it should be forwarded to either Investigative Services or to Exception Processing. Use available tested, proven, online resources (unless cost prohibitive).
Washington	Definitely need a way to verify birth documents in the U.S.
West Virginia	Need reliable verification systems. INS could be more helpful in providing training to states and describing how documents are issued. Should be required to provide each state with training on INS issues. INS will not provide good samples of documents for training purposes. Would like to see a conference with AAMVA members and the INS. A four day workshop with funding for a number of people from each state. States need to be better educated on INS documents and procedures. SSA should develop a better working relationship with AAMVA and the states; and need to upgrade their standards for issuance of SS cards.
Wisconsin	Yes, we support the Framework. Need to have electronic verification of birth certificates.
Wyoming	Need electronic verification. Need to have funding to support standards. All agencies need to share records and information.
District of Columbia	-
<p>Summary: Most states support the <i>AAMVA Security Framework</i> and the Driver License Agreement. Need to have online verification systems. States should not have to verify documents that are not capable of accurate online verification. Need to have an all-driver-pointer system.</p>	

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Section C

The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

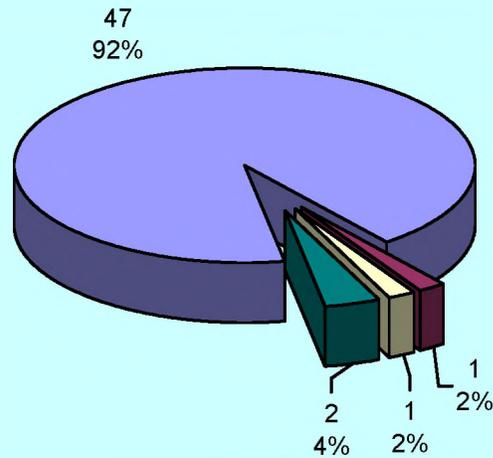
SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-1	Have standards and procedures for the processing of applications for driver's license or personal identification cards to prevent fraud	Notes
Jurisdiction		
Alabama	YES	We don't know that the Act can tell us how to do everything.
Alaska	YES	
Arizona	YES	
Arkansas	YES	We will provide copies
California	YES	
Colorado	YES	
Connecticut	YES	
Delaware	YES	
Florida	YES	Have a system in place.
Georgia	YES	
Hawaii	NO	We do have standards for acceptable documents, but it is not in our operations manual. (lists)
Idaho	YES	
Illinois	YES	Our ID policy manual has a section on ID fraud. A copy will be sent to AAVMA.
Indiana	YES	
Iowa	YES	
Kansas	YES	
Kentucky	YES	The computer system itself reflects the standards. It won't let things happen that aren't supposed to. We require a raised seal on proof of birth and original Social Security cards.
Louisiana	YES	We review reports to check for irregularities. When NGMV is implemented we will have breeder documents to review in the auditing processes. There will be test scores recorded in the system as a check and balance to assure that appropriate Class of license is issued based on the tests completed.
Maine		
Maryland	YES	
Massachusetts	YES	
Michigan	YES	We will send a copy to AAMVA. A Manager signs and approves for all originals 18 and over. 2 signatures are required: clerk and Manager.
Minnesota	YES	
Mississippi	YES	We have a facial recognition process. We accept a voluntary thumbprint on all applications. If you provide one, you are required to do it every time you renew (or upgrade?) your license thereafter. A thumbprint is required of all foreign applicants.
Missouri	YES	We verify documents based on primary and secondary lists. We provide FDR training in some offices. We do image discrepancy: compare the previous image with the person standing in front of us. One office is doing a pilot where they pull the last 4 images to compare.
Montana	YES	Some direction in manual. Will provide more information.
Nebraska	YES	Section 8 of our DL manual will be sent to AAMVA
Nevada	YES	
New Hampshire	YES	
New Jersey	YES	
New Mexico	YES	
New York	YES	Have standard procedures.
North Carolina	YES	Addressed in the DL Examiners Manual.
North Dakota	YES	Our examiner manual. We had a performance review (2003) which required additional things to be put in writing to clarify things we do. We also have Administrative Rules.
Ohio	YES	Information will be provided
Oklahoma	YES	Digital licensing process. Facial recognition and finger imaging. Safeguards especially on back end (after document is issued). Fraudulent document recognition training important.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-1	Have standards and procedures for the processing of applications for driver's license or personal identification cards to prevent fraud	Notes
Jurisdiction		
Oregon	YES	
Pennsylvania	YES	
Rhode Island		
South Carolina	YES	Have document business practices, a reconciliation process and also have back end verification.
South Dakota	YES	It may not be possible to send documents to AAVMA since they are in multiple locations.
Tennessee	YES	Procedures are in writing and in a procedures manual.
Texas	YES	
Utah	YES	
Vermont	YES	Some elements are addressed in a procedures manual. Business processes are in writing. Continuing to improve.
Virginia	YES	Have standard and procedures for the processing, most are in writing. Is a two person process. The system requires the entry of the types of documents that are being presented.
Washington	YES	
West Virginia	YES	
Wisconsin	YES	
Wyoming	YES/NO	Are addressed in the Driver Examiner Manual. Do additional investigations to prevent fraud.
District of Columbia	YES	

Summary: Most jurisdictions have standards and procedures in place for the processing of applications for driver's license or personal identification cards to prevent fraud.



SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-2				
Jurisdiction	Provide document fraud training	Number of hours provided for fraud document training	Utilize the AAMVA FDR Model Training Program	Notes
Alabama	YES	4 hours annual retraining; 8 hours basic	YES	8 hours basic examiner training and 4 hrs. annual re-training. Training is supplemented with jurisdictional material and other training material we obtain or have obtained.
Alaska	YES	Minimal and for new employees only	NO	Only using our own content.
Arizona	YES	24 hours	YES	Also incorporate Arizona's information
Arkansas	YES	8 Hours	YES	We have not added content to the formal program
California	YES	8 hours	YES	In part.
Colorado	YES	4 hours	YES	
Connecticut	YES	4 hours for initial training	YES	4 hours for initial training. Are planning to do refresher training. Will have training from other entities that issue documents such as DOS and BCIS. Use parts of the program and have added CT specific content.
Delaware	YES	8 hours	YES	8 initial – this is the first year for training. Will begin doing refresher training as well. Have added DE specific information
Florida	YES	4 Hours	YES	4 hours for new employees. The FDR program is 16 hours. Also provide additional training (1 day) through BCIS for all managers. Have not really added FL specific information. Are working on a whole new procedure and will implement portions of the training at that time.
Georgia	YES	12-15 hours	YES	
Hawaii	NO	Sending staff out of state to training.	YES	One supervisor went to Train the Trainer but has since been promoted. The other supervisor went to FDR training but is currently unable to do training. We need AAMVA to visit and provide us train the trainer FDR training. More than one person per county needs to complete the train the trainer FDR training for backup purposes. We have had INS do some training for us. Availability of the FDR classes as taught by AAMVA is the issue. We cannot afford to have our own training department.
Idaho	YES	16 hours	YES	
Illinois	NO	Not Routinely	NO	Not routinely. We had 2 hours of training in December 2004 <u>on immigration documents for the six facilities that began issuing temporary visitor DLs Jan. 1, 2005</u> but do not have resources to provide routine training. It is covered in new employee training classes (4 hours <u>on fraud procedures</u>)
Indiana	YES	4 hours	YES	No additional content added
Iowa	YES	12-16	YES	Provide the minimum hours recommended by AAMVA. Have added Iowa specific information.
Kansas	YES	16 hours	YES	And also add some content specific to Kansas
Kentucky	NO		NO	We did 2002 training for non-citizen documents that are reviewed by our staff. We also did 2002 training for all citizens with clerks and DL staff. The driver license division does not have full accountability for license issuance. Circuit Court clerks are the issuing agency for KY.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-2				
Jurisdiction	Provide document fraud training	Number of hours provided for fraud document training	Utilize the AAMVA FDR Model Training Program	Notes
Louisiana	YES	1 or 2 hours	YES	We need examples of documents for training. AAMVA needs to come up with a website or video tape showing examples. But it needs to be updated. AAMVA needs to offer the FDR train the trainer program more often.
Maine				
Maryland	YES	Depends on level of training. 40hrs (levels 1 and 2 and internal) for experts, supervisor and managers. Customer service staff get 16 hrs (Level 1), LE gets 16hrs (Level 1)	YES	And additional training for specified equipment, case prep for prosecution.
Massachusetts	NO	-	Will use the AAMVA program	Are on hold but intend to established formal training. Do address some training with employees.
Michigan	YES	No established hours	YES	We have added some of our own content.
Minnesota	YES	Several hours	NO	We provide several hours in new Examiner training plus on the job training. We use part of the FDR training and have added it to jurisdictional information. We also use document fraud training for driver license agents throughout state (they do 75% of DL business, but are not DL employees). They are contract employees, appointed by Governor on DLs behalf. They process applications only, no testing.
Mississippi	YES	4 hour training Haven't done it in a while	NO	
Missouri	YES	12 hours	YES	We use AAMVA's FDR version. We did create a quick reference guide from AAMVA material for staff.
Montana	YES	In-service training 1 or 2 a year (by external INS and auditor). Max 4 hours a year	NO	Currently No. Eventually, one staff person will be trained and will have bearing on future training.
Nebraska	YES	7-14 hours	YES	7 hours with employees who were on board as of 11/2001, plus the Iowa training. Those after 11/2001 receive 14 hours of level 1 and level 2 AAMVA FDR training. No, we did not add content. FDR Training should have additional US documents, and access to a larger supply of good examples of fraudulent documents.
Nevada	YES	-	YES	
New Hampshire	YES	6 hours	YES	Have added NH content.
New Jersey	YES	17 hours within the first year of employment. Long term employees get 5 hours.	NO	Do refresher training as well; Use a program that is based on the AAMVA program.
New Mexico	NO	Not for all-only a few sporadically	NO	

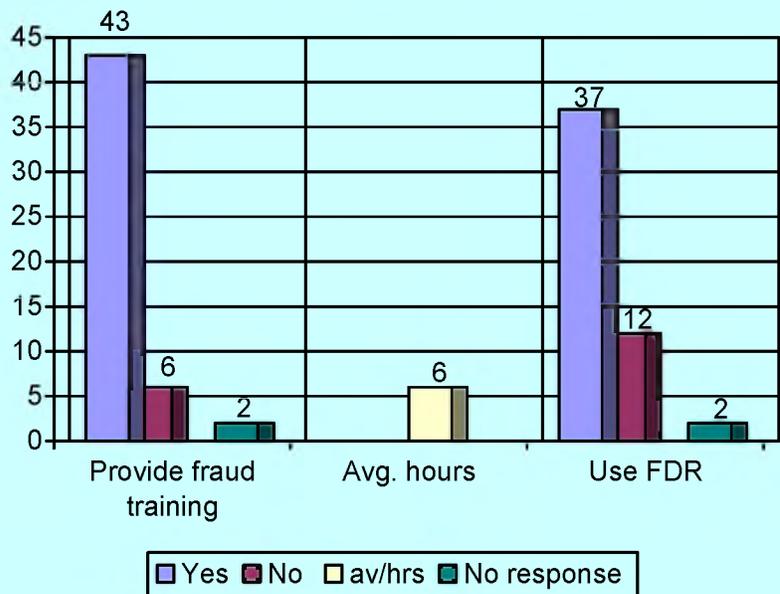
SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-2				
Jurisdiction	Provide document fraud training	Number of hours provided for fraud document training	Utilize the AAMVA FDR Model Training Program	Notes
New York	YES	2-3 hour course	YES	Provide FDR training. 2-3 hour course. As part of the new employee training, they have the NY IGs office come in and participate in the training to provide insight on what can happen if they commit internal fraud. NY has added their own content to the FDR materials. Trying to work with the other states. Have identified all the features in documents for their investigative and training staff. Have several levels of training. Also do VDEC.
North Carolina	YES	20 hours	YES	20 hours for all examiners and receptionists. The License and Theft Bureau will also be participating in the training. All inspectors have already received Level I training. By the end of March all examiners will have completed Level I. Will then advance to Level II training. Would like to have more training from AAMVA for their instructors. Also get a lot of requests from other local agencies to provide training. Have added NC specific information. Another manual is given to all employees and have security measures in place for the manual.
North Dakota	YES	12	YES	
Ohio	YES	Every 2-3 months for 4 to 8 hours. Sooner if something new comes up.	NO	
Oklahoma	YES	40 hours new hire. Additional in-service training yearly (8h)	YES	Fraud division adds info to training, e.g. building case file for prosecution.
Oregon	YES	8 hours	YES	We will begin using the 8-hr AAMVA program in March for all of our field office employees.
Pennsylvania	YES	3-4 Hours	YES	Are considering refresher training. Use portions of the FDR program and have added PA specific information. Will be delivering 12-hour AAMVA training to all managers/supervisors within the next year.
Rhode Island				
South Carolina	NO	Plan to implement training soon through AAMVA	NO	Will be using the AAMVA program when training is implemented.
South Dakota	YES	4	YES	Small groups: 4 – 5 employees at a time.; Yes, we incorporated SD documents
Tennessee	YES	4-12 hours	YES	Will be enhancing system. Thirteen trainers just completed the AAMVA Instructor Preparation Program.; Have not added TN information yet but will.
Texas	YES	-	YES	No have not added content; Using Levels 1 & 2 in FDR Procedures
Utah	YES	16 hours	YES	Also incorporate Utah's information
Vermont	YES	3 hours	YES	3 hours initially. The DLA mandates about 12 hours of training. This is an issue for VT. Also provide refresher training. About 3 hours annually. Use the content but don't do as much lecture and focus on the hands-on training. They provide a mix of authentic and fraudulent documents for them to work with. The refresher training will take on more of a hands-on approach. Have added VT specific content.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-2				
Jurisdiction	Provide document fraud training	Number of hours provided for fraud document training	Utilize the AAMVA FDR Model Training Program	Notes
Virginia	YES	4 hours	NO	4 hours for initial training and refresher training as needed. Other OTJ. Plan to use (AAMVA program) in the future.
Washington	YES	4 hours initially and 4 hour refresher	YES	Have not added own content
West Virginia	YES	8 hours	NO	8 hours per year primarily for managers and supervisors with direct contact. A lot of hands-on training. Have had good cooperation with the State Department in training on Passports.
Wisconsin	YES	1-2 hours	YES	Field staff receive 1-2 hours during orientation. Recently, we had a 4 hour session for all employees for in – service training. We have added Wisconsin content.
Wyoming	YES/NO	Have done some training in the past. Have been developing program and collecting samples. Are getting ready to do the AAMVA program this fall. Will be 12-16 hours.	YES	Will be using program in fall 2005
District of Columbia	YES	3 hours	YES	Have had staff go through the AAMVA train-the-trainer.

Summary: Most jurisdictions have fraud training in place. The number of hours provided varies greatly and most jurisdictions are utilizing the AAMVA FDR Model.



SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-3	Have internal controls for business processes	Notes
Jurisdiction		
Alabama	YES	We conduct integrity checks where we try to breach security of employees, year round. Our new system will have biometric logons. We limit who can purge records. We never do deletions, everything stays on the record.
Alaska	YES	Backend auditing and monitoring controls
Arizona	YES	Have online transaction file and instate audits. Desk audits of money and transactions are done. Also have an electronic audit trail.
Arkansas	YES	Transactions are tracked based on log on which shows up on a transaction screen. We have 135 revenue offices; from 1 person part time offices to 15 person offices. In offices with more than 2 people, one person takes applications and the other person issues the license. We have good control on duplicate issuance: you may obtain a duplicate without additional documentation if you voluntarily give a fingerprint and it is on file. Otherwise, you must provide proof of identity and then all duplicate seeking applicants are checked against their prior image. On out of state licenses, we hold those until audited by internal audit staff. The applications are matched against ARK records for issued ARK licenses to see, for example if the out of state license was actually surrendered. Then, the out of state license is destroyed and the previous state is notified of surrender and issuance.
California	YES	
Colorado	YES	Covers all aspects of business
Connecticut	YES	Have a variety of controls. (Included in their security procedures for the attachment to A2.)
Delaware	YES	Have a cash collection system. Monitor all transactions, what facility, what person and what was done. Use log-in IDs and passwords. Manage all supplies for the document. Have sight controls. The application is done and managed by computer. All forms are computer generated. Indicate all documents that were used. Don't scan documents. Don't have the 2 person check system and don't do background checks on their employees. The DLA should not have gone to this level requiring the background and financial checks on employees. Are looking at audit controls on-line.
Florida	YES	Have a comprehensive quality assurance program that has been very successful.
Georgia	YES	Would like to have more. Have a new system to implement that will provide more stop checks and internal controls; will provide audit and reports.
Hawaii	YES	Nothing is in writing. Everything on the computer system can be traced to the operator. We have security systems for the buildings we occupy full time.. 2 Honolulu offices are in police stations. Hilo is in the police station. Maui is the most insecure island as Kihe and Hana are mobile offices. Only Lahina and Wailuka are permanent sites on Maui.
Idaho	YES	Various reports
Illinois	YES	We have programming edits to prevent fraudulent transactions. We also have provisions for supervisory overrides. There are host-down procedures when you can't get to (down) mainframe: only certain procedures/transactions can then be done. Image retrieval: we use the image on file for duplicates and corrections. We began collecting images in 1998. If a document is questionable for the line employee, they seek supervisor review. Employees use operator numbers and passwords. All transactions are recorded. We will send this information to AAMVA.
Indiana	YES	Our new system has business rules built into it to prohibit certain transactions that are not authorized.
Iowa	YES	Will establish more internal controls with the redesign of the system (expected in one year). There is a 10% review of all transactions by supervisors. Procedures are addressed in a supervisor's manual. Done at all exam stations and 82 country treasures offices. Have an override report so that when a transaction is overridden they can see who did the override on the transaction. The system creates the report but they have to review it manually. At DOT facilities, two people will see every piece of identification presented by customers. Do not have the process in place at the county treasures offices. Iowa plans to have the appropriate number of control measures in place to satisfy the framework.
Kansas	YES	Yes, Converted back to central issuance to gain more control. Have controls in mainframe system, central issuance reports, and conduct audits. Cover all aspects of the business process.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-3	Have internal controls for business processes	Notes
Jurisdiction		
Kentucky	YES	User IDs; Passwords (changed every 30 days); Transactions can be researched. Limits on who can purge and delete. 2 step process on resolving PDPS hits. Prior photo comes up (past 3 years) for each renewal and duplicate in clerk's office. On line SSN verification. IDs and DLs have the same number. We lock up consumables. We have an end of day accounting process that is checked again at central office. Uniformity across the state becomes an issue. State police do our driver testing.
Louisiana	YES	We review reports to check for irregularities. When NGMV is implemented we will have breeder documents to review in the auditing processes. Also will have test scores recorded in the system as a check and balance to assure that appropriate Class of license is issued based on the tests completed.
Maine		
Maryland	YES	Electronic application process, completely captured. Can be audited. Online reports (web based) in case of overrides (100% reconciliation). Audit randomly 5%. Internal investigation. Inventory control. See documents provided
Massachusetts	YES	Require for all first time license applicants, the clerks take copies of the identification documents being presented. Have log on numbers and passwords. All transactions can be tracked. MA is central issuance so all document supplies are secured by the vendor.
Michigan	YES	The computer system has built in electronic edits at branch offices (if the entry is invalid, computer catches it). We are subject to audits every 3 years or more often if suspicious activity is discovered. Central issuance results in holding license if there is suspicion of fraud.
Minnesota	YES	We train examiners to look for certain patterns during applications, and identify them as suspect for fraud and hold application in suspense requiring further proof and /or visit to offices. We have a central issue system for first time applicants, which are processed by a separate group, not necessarily the person who accepts the application. This equates to a review process for first time applications. Haven't gotten that far regarding internal controls. We do require log in so we can tell who worked on applications. We can tell who does purges or deletions from records. IMDLIS = Improved MN DL Information System (moving towards a paperless system with internal controls built in) is being implemented. We know we need to set up internal controls for agents. We are working towards it. We do assign passwords and change them regularly.
Mississippi	YES	We do covert audits, have transaction reports and lock up consumables.
Missouri	YES	We have a report that captures log on transaction activity. We change passwords regularly. We have internal audit staff and internal staff representatives that call on offices. We do financial audits and look for no fee transactions. We do not allow employees to do own (self) transactions. We audit inventories (consumables). We lock up consumables. We have an over ride report. Over rides are only done by central office, not in the field. We limit who can do purges and deletions.
Montana	YES	On CDL side. All paper checked by auditor (against system). Review of examiners. Non commercial regional managers do onsite visits. They do quarterly audits.
Nebraska	YES	Our interactive DL system takes examiners from application to certificate which the applicant takes to the County Treasurer in order to have a card issued. This system tracks the examiner in all transactions. We can run various reports: pass/fail rate per examiner; a report when a written or drive test takes 10 minutes or less. We also do covert audits; watch examiners administer CDL skills tests. We will begin doing it with regular licenses as well.
Nevada	YES	2 persons must verify documents at time of application. We have other methods as well. Will provide.
New Hampshire	YES	Copy documents, do frequent audits. Non-citizens are done at a central location for new application. Logon IDs and passwords. Supervisory overrides. Roving cash terminal supervisors. Do spot audits. Use video surveillance for testing stations.
New Jersey	YES	Have elements of internal controls in the standards. Are developing an RFP to improve the process. Have a three step identification process. Management approvals for sign-offs and exceptions. Utilize employee training as they have implemented the new process. Bio log audit. Plan to implement stop-block for supervisor over-rides. Have cameras in all DMVs. Do a self assessment for internal controls.

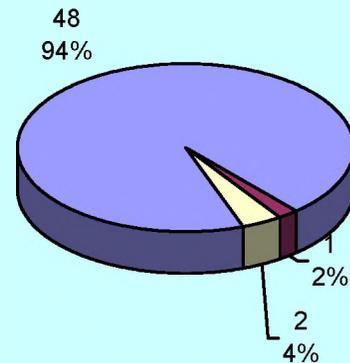
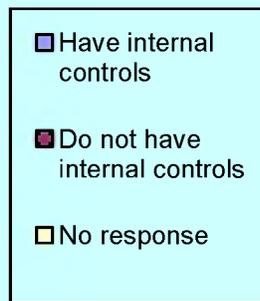
SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-3	Have internal controls for business processes	Notes
Jurisdiction		
New Mexico	NO	If regarding applications, most clerks accept applications at face value unless there is a glaring problem. No process to check random sample due to staffing.
New York	YES	Have a number of internal controls that NY utilizes. Have station audits. Have random audit system. NY is central issuance which gives them further ability to control the process. Have internal audit process for titles and registration. Will physically look at every document. NY issues a lot of management reports that supervisors can review. As they do not require proof of residency they mail the document to the address that the applicant provides and mail is not forwarded. Have an accurate account of customer addresses. In any instance that an override occurs, it generates a report. Have accountability procedures for all of their staff.
North Carolina	YES	Need to make some improvements. Have controls on the handling money. Have spot checks. Covert monitoring of examiners. Have a quality insurance review of all offices. Have logon procedures and passwords (RACF). Can track every process through RACF. Have a computer/paperless system. NC has been doing background checks on examiners for some time.
North Dakota	YES	Some of these internal controls from the ID Framework are in place now. For example, security cameras are at the 8 major offices, a journal that details computer entries onto a driver record by date, time, location and employee number. A report is generated when money is deleted from a record. A personal password is required to delete entries from a record and we have automated testing at the 8 major offices. Some of the Framework control measures in the appendix will require system changes and will have to wait until a major re-write of the system. A request for funding for the re-write is in the legislature at this point.
Ohio	YES	Track every move in application. Will send information
Oklahoma	YES	In order to override for exception HQ has to be contacted and it will be recorded for audit. Monthly reports for verification. Licensing is 2 step process. Application approval is responsibility of examiner. Issuing of the actual documents is done by 3rd party (tag agent is also state agency).
Oregon	YES	To assist in verifying authenticity of out-of-state licenses and supporting documents we use Docutector, US ID Manual, ID checking guide, black lights and magnifying glasses. Double check any combination of name, address, DOB during the photo process. Require double check (2 people) of all ID documents for original transaction. We employ a separation of duties wherever practical. (e.i, one TSR enters the initial application and administers the knowledge test, another TSR will issue and another TSR will conduct the photo process).
Pennsylvania	YES	Have an electronic driver verification system that requires the systems check. Requires two levels of audits. Have inventory control system for all of their products (Secure Inventory Management System).
Rhode Island		
South Carolina	YES	Fraud detection unit runs all issued DLs through SSOLV. Supervisor must reconcile at the end of the day.
South Dakota	YES	Everything is password protected. Passwords are changed regularly. Consumables are under lock and key. We do background checks on all DPS employees. Local government partners cannot accept immigration documents because they do not have background checks or appropriate training. We have monitoring by co-workers (self-monitoring). We have delete reports: what record has been deleted and who deleted it and the date. A supervisor reviews this report every week. If an Examiner did not check PDPS on a license – the computer will not let a license be issued. Over ride report: if they do a PDPS check and it comes back a ‘not’, supervisors can over ride and report shows all over rides.
Tennessee	YES	Have end-of-day reconciliation process, end of day review by supervisor of all transactions, internal control access, levels of access, etc.
Texas	YES	
Utah	YES	Nothing in writing. Have supervisory review, security cameras in offices. Alert examiners if multiple licenses are being sent with the same address. Track which types of documents are used.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-3	Have internal controls for business processes	Notes
Jurisdiction		
Vermont	YES	Before a document makes it to data entry, it goes through quality control. Documents are seen by several people. Have a foreign document policy. Foreign applicants are given a temporary and the application is sent to the main office and the application is investigated before the license is sent to the mailing address. Have been able to identify illegal immigrants. They also flag all records for foreign applicants so that each time they come in they must present legal presence documentation. Has been successful.
Virginia	YES	Document supplies are secured and only authorized personnel have access. Inventory is updated each day. Background checks for new hires. Two person verification process.
Washington	YES	Will provide. Video surveillance in all centers. Passwords expire every thirty days. System access is limited based on the level of the employee and their status. If the manager processes a transaction out-of-the-ordinary is documented on an accountability worksheet and is reviewed the next day to confirm that two parties were involved. District managers perform spot checks. Have a two person accounting and reconciliation process. Have separate case draws for each employee processing transactions.
West Virginia	YES	Check all applications daily and are reviewed to make sure that they match the system. Have restricted access on certain computer screens. Need upper management approval. Fraud training is an internal control for managers to assist. Check transactions and money taken in.
Wisconsin	YES	Have internal controls, but will implement additional controls as a result of recommendations from a recent risk assessment
Wyoming	YES	Get reports on back-outs and deletions of records. All applications, etc., will be sent by the on-site supervisor, who reviews the records, and then they are sent to the quality review section. WY is central issuance, show the license is not sent until the checks on the driver are completed. Use log-on and password procedures. Have reports for testing section.
District of Columbia	YES	Access to the system. Limitations on what staff can do. Supervisor overrides.

Summary: Most jurisdictions indicated they have some form of internal controls in place. Controls utilized vary.



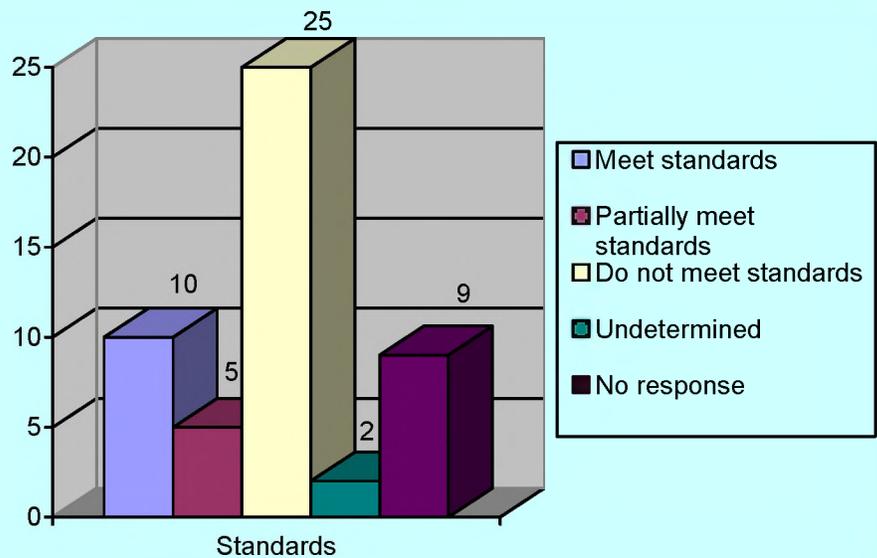
SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-4	Follow the AAMVA standard for internal controls	Notes
Jurisdiction		
Alabama	YES	
Alaska	-	
Arizona	-	
Arkansas	NO	We do obtain out of state histories.
California	-	
Colorado	-	
Connecticut	YES	Have several of the controls. At least 3 people verify the documents. Photo copy all ID documents with the application. Have the ability to track log-on activity. Customer signature is required on the application.
Delaware	YES/NO	Some of DE does and some of DE doesn't and some of DE will never do. DE has at least several internal control elements in place.
Florida	NO	Not really sure. But should be close.
Georgia	NO	Working on it.
Hawaii	NO	
Idaho	YES	
Illinois	NO	We do a lot of it (See previous question.) Currently member of compact, but not currently in compliance with all of draft
Indiana	NO	
Iowa	NO	Iowa is working towards the AAMVA standard.
Kansas	YES	But not formally in writing
Kentucky	NO	We think we're close. We are an instant issue state.
Louisiana	NO	Not all of them.
Maine		
Maryland	YES	Meet or exceed requirement. With new electronic system complete accountability.
Massachusetts	Not sure	
Michigan	NO	We have some control measures in place for each risk area but not all (4 and 5) and we don't capture the photo at first stage or compare images, etc.
Minnesota	NO	Working towards it.
Mississippi	NO	We do some of them.
Missouri	NO	
Montana	NO	Some of the requirements are in place. For instance, 2 person process with money (if 2 people are available).
Nebraska	YES	
Nevada	-	
New Hampshire	YES	
New Jersey	YES/NO	Using the AAMVA standard as a target.
New Mexico	NO	Not sure what AAMVA's standards are.
New York	YES	
North Carolina	YES/NO	Continue to use the AAMVA standards to make improvements in NC.
North Dakota	NO	Not yet. See previous question.
Ohio	NO	
Oklahoma	NO	Parts of it.
Oregon	NO	We have some controls in place but not documented formally as agency risks and controls
Pennsylvania	YES	Are compliant with each component. Have at least one of the control measures in place.
Rhode Island		
South Carolina	NO	

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-4	Follow the AAMVA standard for internal controls	Notes
Jurisdiction		
South Dakota	NO	We don't have a formal plan in place. We're doing a lot, but informally. We photo copy breeder documents. We have automated testing with random questions. We allow approved interpreters. We maintain test scores for a specified period of time. We lock up laminates. We have different access/security levels for things that can be done on the system. Examiners do not have the capability to download and print information from the system. We have a disaster recovery plan. We have a financial reconciliation process – 3 steps.
Tennessee	YES/NO	Not specifically but they are in line. TN continues to make improvements.
Texas	-	
Utah	NO	
Vermont	NO	Meet about 75% and have at least 1 of the control measures in the specified areas.
Virginia	YES	Nearly in compliance.
Washington	-	
West Virginia	NO	
Wisconsin	NO	We're doing some of it. Systems are not designed at this point to make the enhancements. As we design new systems, we try to incorporate enhancements.
Wyoming	YES/NO	Do not follow standards in full.
District of Columbia	Not Sure	

Summary: Most jurisdictions do not follow the AAMVA standard for internal controls.



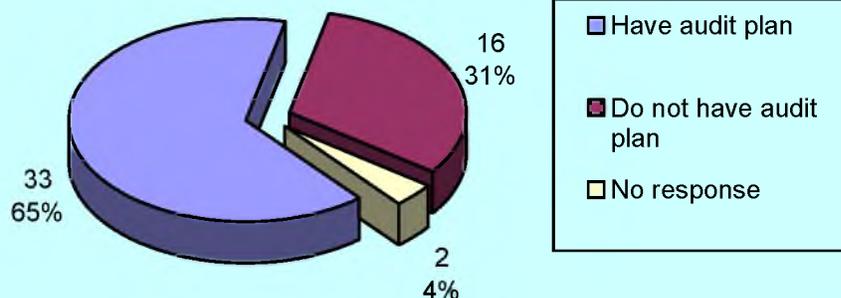
SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-5	Have an audit plan in place for the DL/ID issuance process	Notes
Jurisdiction		
Alabama	NO	
Alaska	YES	
Arizona	YES	Will provide-covers all aspects
Arkansas	YES	Financial audits which can expand if fraud is suspected. We have folks that review transactions for aberrations. If detected, our internal audit folks visit the office. We have a duplicate name list that is checked monthly.
California	YES	For the most part. We do not have random computer auditing but we do perform some secondary verification on birth documents prior to issuance of the card. Additionally, several transaction types require manager's password to continue entering application information in the system.
Colorado	YES	Covers all aspects of business
Connecticut	NO	Use department auditors at least once a year. The state is developing a new audit plan. Have an independent agency for internal audits of staff.
Delaware	YES	Have a cash audit plan and are developing an internal audit plan. All consumables are audited. Can do audits when needed. The DE Office of Auditor conducts a database audit every three years. Looks for deleted conviction, etc., and sees why they were deleted.
Florida	YES	Part of the quality assurance. Have an internal audit program.
Georgia	YES	Can tie any transaction back to the employee. Utilize software logic for the audit process.
Hawaii	NO	
Idaho	YES	Not a written plan-in process. Auditing and review processes of all transactions within an office are done randomly
Illinois	NO	We hope to establish one. Financial & transaction audits are in place. We 'back seat' examiners to see if the skill test is given properly and scored correctly.
Indiana	YES	We just revised our financial audit processes. Audit responsibility is in a different division (field services) and we do not have anyone here to answer that question in detail. We will try to send a copy to AAMVA.
Iowa	YES	All transactions are audited and accounted for. All financials audit are accounted for (reconciliation). Have a business audit that is performed by the state audit office.
Kansas	YES	Mostly
Kentucky	NO	We have procedures in place for accounting. We can look up transactions on a case by case basis. There are processes in place to check on things on a case by case basis.
Louisiana	NO	We audit CDL applications. We can audit transactions on others as needed based on suspicion. We can audit financial transactions if it doesn't balance, in cases of suspicion.
Maine		
Maryland	YES	Internal audit division. Legislative audit
Massachusetts	YES	Have an audit plan in place. All documents are reviewed buy the auditor in each office. Have audit capabilities for all transactions.
Michigan	YES	We have a new information security office comprised of internal audit, investigations division and internal security division. They are looking at doing more data mining. We are subject to outside audits from the office of Auditor General. We participate in CDL audits. Also, our ID analysts who approve exceptions periodically review declaration sheets as well as documents retained with those.
Minnesota	YES	Financial audits are in place. IMDLIS will have other audit aspects included. The review process is not a formal process.
Mississippi	NO	
Missouri	NO	We do not follow the DLA audit plan. See previous comments for financial audits, etc.
Montana	YES	On CDL side. All paper by auditor (against system). Review of examiners. Non commercial regional managers do onsite visits. They do quarterly audits (money, end of day reports and paperwork).
Nebraska	NO	We do financial audits, transaction audits and covert employee audits. In the future, we may have some difficulties with oversight and accountability with County Treasurers when DLA standards are imposed.
Nevada	YES	Have an audit unit.
New Hampshire	YES	Have an audit team in the business office that conducts all audits.
New Jersey	NO	Conduct audits after the fact.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-5	Have an audit plan in place for the DL/ID issuance process	Notes
Jurisdiction		
New Mexico	NO	Staffing now. Fiscal year budget 2006 does provide for staffing so some (minimum) checking will begin in FY 2006.
New York	YES	Financial, transactions, employees, etc. Are audited by the State Comptroller.
North Carolina	YES	Do searches for unusual activity through RACF. Can track every process and generate reports. Can determine when the transaction occurred. Can reconstruct the examiners entire day to look for irregularities. Will also be implementing one-to-one face recognition to match the previous image in the file. Will be able to audit any overrides of the issuance of documents to individuals who are issued when they should not have been. Can monitor all overrides on the system.
North Dakota	YES	Most are automatic processes. Will send a copy of the journal report. There is no plan per se.
Ohio	YES	Collect. Audit at end of day. Will send information.
Oklahoma	YES	Internal audits (DPS). State auditors are more looking operational efficiency. Audit can go as far as sting operations when fraud is expected.
Oregon	NO	
Pennsylvania	YES	Have daily on-site supervisory audit and semi-annual audits of every employee, conducted by Central Office Process Performance Unit.
Rhode Island		
South Carolina	NO	Not a written audit plan but are working to develop one.
South Dakota	YES	Not a written / formal plan. We reconcile financial reports at end of day, then they're reconciled again in our main office, then sent to fiscal manager for final bank reconciliation. We have delete reports (see previous). Our Mainframe has an examiner ID which is recorded for every transaction.
Tennessee	YES	
Texas	YES	Covers all business processes and aspects-internal and external.
Utah	NO	
Vermont	NO	Will be working on this area over the next six months. Will be working with staff to develop an audit plan.
Virginia	YES	Have a systems audit trail. Monitors all transactions and who made the transactions within the last two years. All transactions are audited at each services center that night or the next day. Are working to centralize the audit transactions.
Washington	YES	Covers all aspects
West Virginia	NO	
Wisconsin	YES	We have financial, transaction and employee audits but need to do more. Our financial audit system is not real robust. Karen Schwarz just finished a 6 month project on fraud. We're just now deciding which recommendations to follow through on.
Wyoming	YES	Have a quality review section. All offices are audited by internal review. Review all financial transactions. Audit all testing aspects. Pass/fail ratios. Numbers of tests conducted in a day.
District of Columbia	YES	Have daily random audits. Every transaction can be monitored. Have auditors. Generate reports for supervisors. Have an Integrity Security Director. Will continue to make improvements.

Summary: Most jurisdictions have an audit plan in place for DL/ID issuance processes.



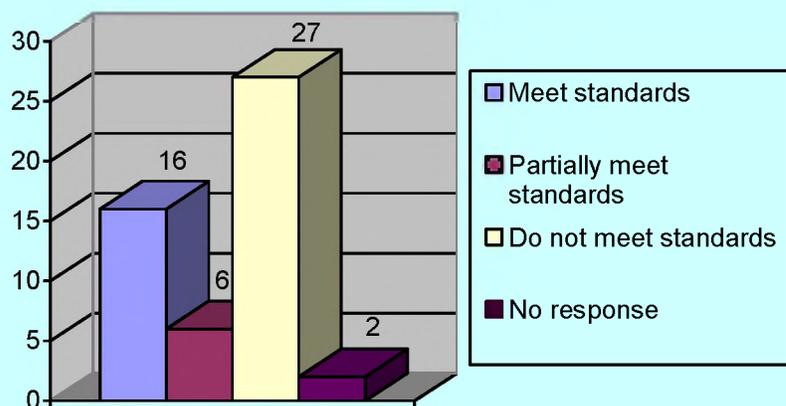
SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-6	Adhere to AAMVA's name collection use and maintenance procedures	Notes
Jurisdiction		
Alabama	YES	We were asking for character fields to be expanded before AAMVA did it.
Alaska	YES	In substantial compliance
Arizona	YES	Have 11 of the 18 requirements
Arkansas	NO	
California	YES	We are not able to collect or store 125 characters in the name filed. To do so would require major reengineering of our mainframe.
Colorado	YES/NO	For the most part-cannot store or display 125 characters.
Connecticut	NO	Can capture 32 characters.
Delaware	YES	Use full names. AKA is linked to the name change. The length of name meets the TSA requirements. Meets the 125 characters for name.
Florida	NO	
Georgia	YES	To a limited degree. GA can capture 26 characters. Are going to increase it to 40. 125 characters is going to be difficult. Amount of real estate on the document is limited.
Hawaii	NO	
Idaho	YES/NO	Not entirely-cannot accommodate 125 characters-do collect true full name
Illinois	NO	We don't collect full middle name and don't collect full base names. We don't use 125 characters. We have data base issues here.
Indiana	NO	We allow middle initial or no middle name. We allow fewer characters. There is a current debate on name fields as to whether nicknames would be allowed in Indiana.
Iowa	NO*	Not at this time... plan to in the future. The new system (implemented in one year) will accommodate for the name collection and maintenance procedures and will provide a complete history of the name. Current procedures provide for three names (AKA) on the DL record. After three, one drops off. Only maintain three history names and the current name.
Kansas	YES/NO	Cannot capture 125 characters. Use as much as possible.
Kentucky	NO	We collect full legal name on the data base.
Louisiana	NO	We do not allow for 125 characters, etc.
Maine		
Maryland	YES	30 characters in MD system will transpose to 35 characters for AAMVAnet. Currently use 125 characters for Hazmat not for non commercial and commercial).
Massachusetts	NO	MA law allows the use of different than legal name. Capture as much of the name as they can.
Michigan	NO	We will mail a copy to AAMVA. We do not necessarily collect all name variations. We may have to truncate names due to limits on data fields. Foreign applicants especially create problems due to multiple names and names requiring interpretation.
Minnesota	NO	We haven't totally agreed on this with AAMVA
Mississippi	YES	We will send our (600 page) procedure book to AAMVA.
Missouri	NO	AAMVA requirements ask for more data characters than we have room for. We provide for: Last name 25 characters, First name 15 characters, Middle name 12 characters, and suffix 3 characters. We also have retention issues for keeping prior names and common usage. We do not collect a full name as it appears on the legal document (allow middle initial instead of full middle name for example). July legislation will require us to capture full legal name. However, if name exceeds characters, still will not be able to capture all of it.
Montana	NO	Truncation process that does not follow process. 31 characters on document. In record it is up to 80 characters. Use of spacing and odd characters is a problem.
Nebraska	NO	We don't always capture full legal name (Bill rather than William if they show a document using that name). We allow use of middle initial or nothing at all sometimes if that's the way the applicant wants it.
Nevada	YES	Mostly
New Hampshire	YES/NO	Do not capture the full legal name. Capture the middle initial.
New Jersey	NO	Collect 27 characters broken into three fields. 9, 1, 17. Do require name linking from the customer. One of the biggest problems in relation to the non-US citizen.
New Mexico	NO	
New York	YES	With the exception of the number of characters. Have a limitation of 20 characters. Are looking to expand the number of characters to be unlimited. Their system does prevent duplicates when they shorten the name.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-6	Adhere to AAMVA's name collection use and maintenance procedures	Notes
Jurisdiction		
North Carolina	YES	Full legal name. Face of license can store a maximum of 32 and the system is unlimited for the number of characters that can be captured.
North Dakota	NO	We do collect full name inclusive of suffixes, however we do not store all names listed on different resource documents. We have the current name and one previous name except if it's a CDL. Then, we have the current name plus 3 addition names.
Ohio	YES	Will send information
Oklahoma	NO	Goal is to have it implemented by 9/30. Use current AAMVAnet standards.
Oregon	NO	DMV does not dictate the manner in which a person's name is to appear on a license, permit or identification card other than the name cannot include any numbers or special characters. An applicant may use any name he/she desires, provided it is not used for unlawful purposes and is the name most commonly used by the person to conduct the person's business, e.g., tax reports, social security, insurance policies, etc. This is considered the person's "true name". The person must present acceptable proof of age and/or identity documents showing the name to be used. We do maintain AKAs.
Pennsylvania	NO	Collect 35 Characters. Are working towards the 125 characters, the new system will be able to accommodate the 125.
Rhode Island		
South Carolina	NO	Keep track of name changes with their own system. Can capture a total of 73 characters. Last 30, first 20, middle 20, suffix 3
South Dakota	NO	We mostly do it. We only allow 55 characters. This is a state wide protocol for all government agencies and would be a major task to update the whole state to 125 characters. We don't have truncation flags.
Tennessee	YES	Capture X characters.
Texas	NO	Not at this time-will be included in current re-engineering effort.
Utah	YES	Mostly
Vermont	NO	Can not use anymore than 34 characters in their system. Looking at a new on-line system that will allow them to collect the 125 characters.
Virginia	NO	Capture 33 characters and 2 comas for the entire name. If the name is too long, may use the middle initial or leave out the middle name. Are looking at going to 125 in the future. Have the capabilities to do so.
Washington	YES/NO	Not entirely
West Virginia	YES/NO	System accommodates 125 characters (First name 13, Middle 17, Last name 17, Long name 17, and only 28 will print on a DL/ID). Don't meet the standard for history of the names. Only keep the current name and one previous. Do allow hyphens in the last name. Allow a person to drop their middle name and use the madden name as the middle name.
Wisconsin	NO	Do not require full middle name capture and system currently has 85 character name limit
Wyoming	YES	Capture 73 for the last name 12 on middle and first and 4 for suffix.
District of Columbia	YES	Use full legal name.

Summary: A majority of jurisdictions do not adhere to the AAMVA name collection and maintenance procedures.



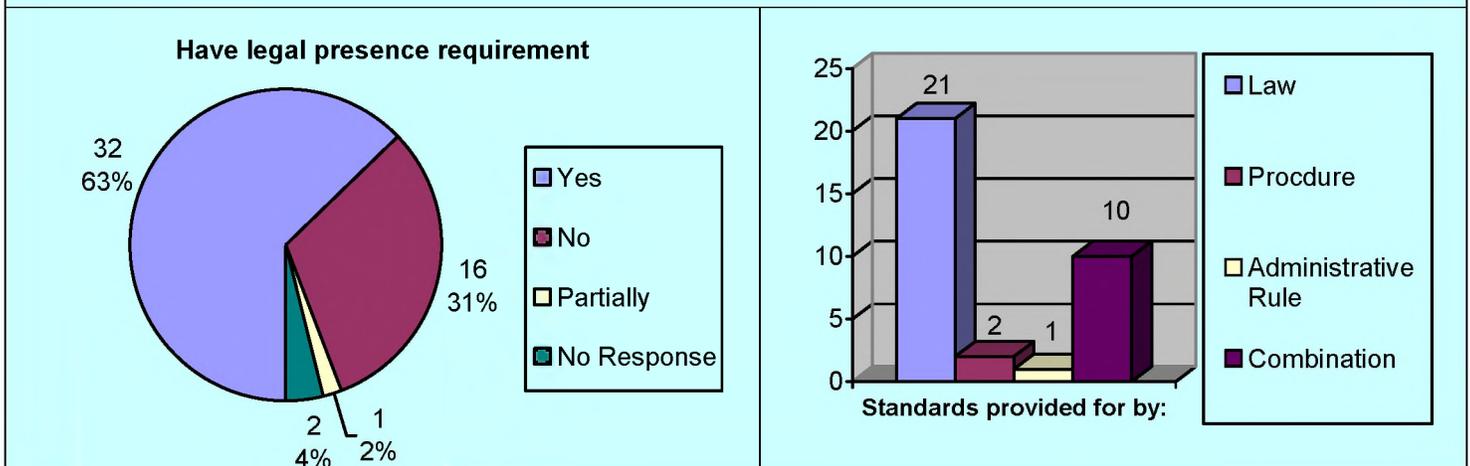
SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-7	Have legal presence requirement	Notes	Provided for by: Law, Procedure, Administrative Rule or Other
Jurisdiction			
Alabama	YES		Law and Administrative Rule
Alaska	NO	Trying to pass law	
Arizona	YES		Law
Arkansas	YES		Law
California	YES		Law
Colorado	YES		Law
Connecticut	YES		Administrative Rule and Law
Delaware	NO	However, the way DE has structured the document list it does somewhat require it as illegal aliens do not have the documents.	Administrative Rule
Florida	YES		Law
Georgia	YES		Law
Hawaii	NO		
Idaho	YES	If no SSN, required to have legal presence	Procedure
Illinois	YES	Yes, but only for temporary residents only for temporary residents legally in the country but ineligible for an SSN	Law, Procedure and Rule
Indiana	YES		Law
Iowa	YES	The law does not use the term legal presence. It ties the expiration to end of stay and who is exempt from an SSN card. Iowa then substitutes the immigration document control number for the SSN.	Law, Procedure and Administrative Rule
Kansas	YES		Law
Kentucky	YES		Law
Louisiana	YES	We don't check again at time of renewal or for first time CDLs which we consider to be an 'upgrade' license. In NGMV we will go to variable expiration dates and verification of documents at renewal time (for non US citizens).	Law
Maine			
Maryland	NO		N/A
Massachusetts	NO		N/A
Michigan	NO		N/A
Minnesota	YES		Rule
Mississippi	YES		Law
Missouri	YES	It becomes effective July 1st '05	Law
Montana	NO		N/A
Nebraska	NO	The way the statute is written, the applicant has to present a US issued identification document and the SSN is verified, so we have an unwritten legal presence law. SSN is required by law. I94 with supporting docs can be used in lieu of SSN	Law for SSN and US issued ID doc.
Nevada	YES/NO	Not in law but must have documents showing they are here legally	Procedure
New Hampshire	YES		Law and administrative rule
New Jersey	YES		Law
New Mexico	NO		
New York	NO	Is essentially in place by the NY acceptable document list.	N/A

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-7	Have legal presence requirement	Notes	Provided for by: Law, Procedure, Administrative Rule or Other
Jurisdiction			
North Carolina	NO	Do essentially though the ID requirements. Legislation is under consideration. Need to be careful of how legal presence is defined and that the lack of a legal presence requirement is a sign of having a less secure issuance system.	N/A
North Dakota	YES	We require documents by procedure that de facto requires Legal Presence. This is the same issue as the DLA presents.	Other:
Ohio	YES		Law
Oklahoma	YES		All
Oregon	NO		
Pennsylvania	YES		Law
Rhode Island			
South Carolina	YES	But don't require documents for citizens upon every renewal (marked in system that they are citizens). Verify documents every renewal for non-citizens.	Law
South Dakota	YES		Law
Tennessee	YES		Law and Administrative Rule
Texas	NO		
Utah	NO	But current legislation is pending governor's signature that would require it	
Vermont	YES		Law
Virginia	YES		Law
Washington	NO		
West Virginia	YES		Law and Administrative Rule
Wisconsin	NO		N/A
Wyoming	YES		Law
District of Columbia	YES		Law/Policy Procedure

Summary: Most jurisdictions have a legal presence requirement.



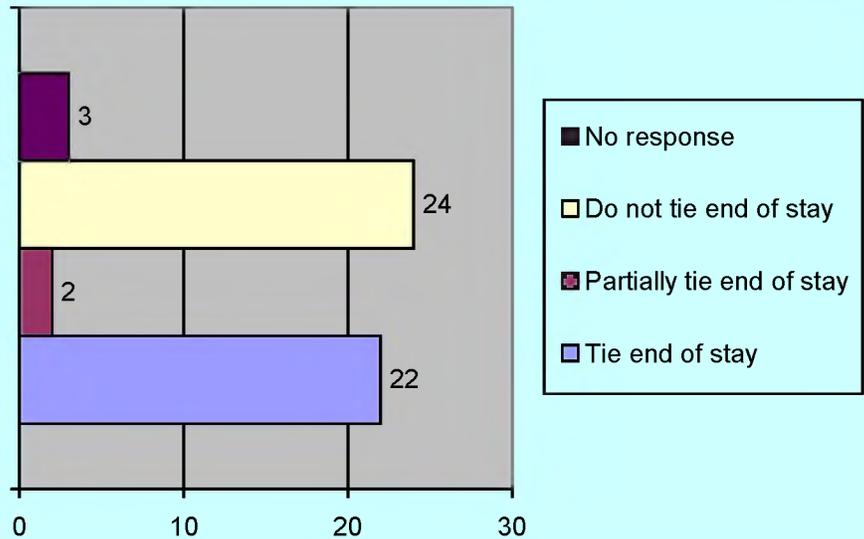
SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-8	Tie end of stay to the expiration date of the DL/ID	Notes
Jurisdiction		
Alabama	YES	
Alaska	NO	
Arizona	YES	By policy
Arkansas	NO	
California	YES/NO	We are currently in the process of re-implementing this process and will have it completed by June 05. Previously, in 1994-2000 we did term the cards to end of stay.
Colorado	YES	
Connecticut	NO	Have proposed legislation for the second year in a row.
Delaware	NO	It should be. We will need a national standard. If they have a temporary VISA and they are hauling HAZMAT (TSA requirement) DE will tie the end of stay.
Florida	YES	
Georgia	NO	Have a bill in the general assembly to do so.
Hawaii	NO	
Idaho	NO	
Illinois	YES	Yes, for temporary visitors who are legally here and not eligible for SSN, but if they are eligible for SSN, we do not do it.
Indiana	NO	
Iowa	YES	
Kansas	YES/NO	No except on non-resident CDLs.
Kentucky	YES	
Louisiana	NO	We will tie end of stay to expiration dates with NGMV
Maine		
Maryland	NO	Want to, but can not.
Massachusetts	NO	
Michigan	NO	
Minnesota	YES	We call it a 'status check date'. We have to issue a 4 year license by law and couldn't change that so promulgated an Administrative Rule to put 'status check' date on license for those here temporarily. 60 days before status check date, notice to the individual goes out requiring proof of legal presence or license will be cancelled. They are required to come in to renew. We don't require them to surrender the license. It still could be used for ID, but (Minn.) retailers are aware of 'status check' dates. One half of one percent of driver licenses have 'status check' dates on them. We don't see us getting legislation passed to change that without a federal mandate.
Mississippi	NO	Driver licenses issued to non-citizens are issued for one year. The license says 'Non Citizen' on it. In order to renew it, applicants must show that they are still legally in the US.
Missouri	NO	As of 7/1/05 this answer will be yes.
Montana	NO	2 bills pending for legal presence.
Nebraska	NO	We tried to get legislation in 2003, but it did not pass.
Nevada	YES	
New Hampshire	YES	
New Jersey	YES	Then add ninety days to the expirations date due to customers not getting in on time.
New Mexico	NO	
New York	NO	Have looked at it and would have been a massive undertaking in 2002. In January 03 NY implemented a temporary visitor program. If they provide the appropriate documents they will put on the document temporary visitor and the date that the document expires in bold red letters. After that date they can no longer complete a transaction with NY until they provide the updated documents.
North Carolina	NO	Will require this year.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-8	Tie end of stay to the expiration date of the DL/ID	Notes
Jurisdiction		
North Dakota	NO	Legislation has been submitted but don't know fate of bill.
Ohio	YES	
Oklahoma	YES	
Oregon	NO	
Pennsylvania	YES	
Rhode Island		
South Carolina	YES	Any DL that is issued is valid, must be issued, for a minimum of 1 year. Required by law. Any temporary is valid for a minimum of 1 year.
South Dakota	YES	
Tennessee	YES	TN will only issue to U.S. citizens or lawfully permanent residents. TN issues the certificate of driving (with photo) for non-documented and non-citizens and is valid for one year or the authorized period of stay.
Texas	-	
Utah	NO	Not at this time. Legislation is pending governor's signature
Vermont	YES	Effective July 04 – is in statute
Virginia	YES	
Washington	NO	
West Virginia	YES	
Wisconsin	NO	
Wyoming	YES	Also for non-residents WY puts a code (-NR) which states they are a non-resident. Is in the bar code and listed on the codes/restrictions on the back of the license.
District of Columbia	YES	With SSOLV

Summary: Most jurisdictions do not tie the end of stay to the expiration of immigration documentation.



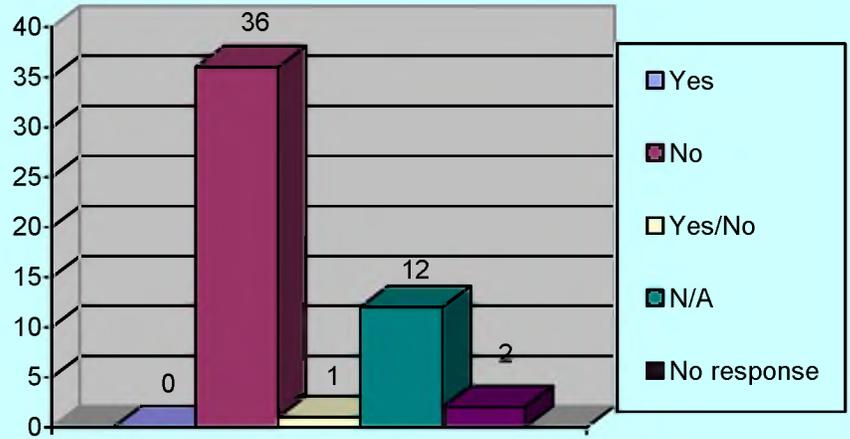
SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-9	Issue non-photo DL/ IDs to undocumented immigrants	Notes
Jurisdiction		
Alabama	NO	We do not issue non-photo cards
Alaska	N/A	
Arizona	NO	
Arkansas	NO	There is no alternative if they cannot prove legal presence.
California	NO	
Colorado	NO	
Connecticut	NO	
Delaware	N/A	
Florida	NO	
Georgia	NO	
Hawaii	N/A	
Idaho	NO	
Illinois	NO	
Indiana	NO	
Iowa	NO	Iowa has discussed ways to address this issue but has not pursued any options. Iowa currently has a bill proposed for accepting other foreign documents.
Kansas	NO	
Kentucky	NO	
Louisiana	NO	A law was passed a year ago that required us to issue a 1 year license to undocumented aliens, but we never implemented it. NGMV will address the problem with variable expiration dates.
Maine		
Maryland		
Massachusetts	N/A	
Michigan	N/A	
Minnesota	NO	
Mississippi	NO	
Missouri	NO	
Montana	YES & NO	Yes on records but not on digital photo (1 by 1 request by LE or DMVs through business desk – through CJIN limited capability).
Nebraska	NO	
Nevada	NO	
New Hampshire	NO	
New Jersey	NO	Do not issue non-photos to non-citizens
New Mexico	NO	
New York	N/A	
North Carolina	N/A	
North Dakota	NO	We do not issue to undocumented immigrants.
Ohio	NO	
Oklahoma	NO	
Oregon	N/A	
Pennsylvania	NO	
Rhode Island		
South Carolina	NO	
South Dakota	NO	
Tennessee	NO	TN issues a certificate of driving, not used for identification. The document does have a photo.
Texas	N/A	
Utah	N/A	
Vermont	NO	Do not issue to un-documented immigrants.
Virginia	NO	
Washington	NO	

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-9	Issue non-photo DL/ IDs to undocumented immigrants	Notes
Jurisdiction		
West Virginia	NO	
Wisconsin	N/A	
Wyoming	NO	
District of Columbia	NO	

Issue non-photo DL/ID to undocumented immigrants



Summary: Of those jurisdictions that have a legal presence requirement, most are not issuing non-photo DL/IDs to undocumented immigrants.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-10	Issue temporary DL/ID to applicants who present:						
	valid, unexpired non-immigrant Visa	non-immigrant Visa status form	pending application for asylum	pending or approved application for temporary protected status	approved deferred action status form	pending application for adjustment of status	Notes
Jurisdiction							
Alabama	YES	YES	YES	YES	NO	YES	Yes You must have at least 160 days on your I94 to get a temporary license. No to e, yes to everything else. 32-6-10.1 Code of AL 1975
Alaska	NO	NO	NO	NO	NO	NO	
Arizona	NO	NO	YES	YES	NO	YES	
Arkansas	NO	NO	NO	NO	NO	NO	
California	NO	NO	NO	NO	NO	NO	No to all if document is not presented with a valid INS document.
Colorado	NO	NO	YES	YES	YES	YES	The last four will not be accepted alone-must have accompanying documents.
Connecticut	NO	NO	NO	NO	NO	NO	Do not issue a temporary document.
Delaware	NO	NO	NO	NO	NO	NO	Do not issue a document marked temporary.
Florida	NO	NO	NO	NO	NO	NO	
Georgia	NO	NO	NO	NO	NO	NO	
Hawaii	NO	NO	NO	NO	NO	NO	If they can get a verification from SSA that they are legally present and not eligible to obtain a SSN, we issue a regular driver license for up to 6 years
Idaho	NO	NO	NO	NO	NO	NO	
Illinois	YES	YES	YES (if Cleared on SAVE or SSOLV)	YES (if Cleared on SAVE or SSOLV)	YES (if Cleared on SAVE or SSOLV)	YES (if Cleared on SAVE or SSOLV)	
Indiana	NO	NO	NO	NO	NO	NO	
Iowa	NO	NO	NO	NO	NO	NO	Iowa does not have a document that is marked temporary
Kansas	YES	YES	YES	YES	YES	YES	
Kentucky	YES	YES	YES	YES	YES	YES	Yes to all if legal presence has been established at the counter.
Louisiana	NO	NO	NO	NO	NO	NO	In NGMV, restrictions codes have been designed to identify aliens. These restriction codes will provide text on the reverse side of the license to identify/categorize Permanent Resident Alien, Non-Perm Alien, Student Alien, and undocumented alien. But we had not discussed the word TEMPORARY being placed on the license.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-10	Issue temporary DL/ID to applicants who present:						
	valid, unexpired non-immigrant Visa	non-immigrant Visa status form	pending application for asylum	pending or approved application for temporary protected status	approved deferred action status form	pending application for adjustment of status	Notes
Jurisdiction							
Maine							
Maryland	NO	NO	NO	NO	NO	NO	
Massachusetts	NO	NO	NO	NO	NO	NO	
Michigan	NO	NO	NO	NO	NO	NO	
Minnesota	-	-	-	-	-	-	See identification requirements. These documents (a. – f.) are not primary documents but can be considered in conjunction with primary documents. We could issue on an exception basis depending on what else they have. For example on a., visa doesn't mean anything. We're looking for I94.
Mississippi	YES	YES	YES	YES	YES	YES	
Missouri	NO	NO	NO	NO	NO	NO	
Montana	NO	NO	NO	NO	NO	NO	
Nebraska	NO	NO	NO	NO	NO	NO	
Nevada	-	-	-	-	-	-	
New Hampshire	YES	YES	YES	YES	NO	YES	Have a paper temporary that is valid for 45 days. Once a background check has been conducted the expiration date is tied to the end of stay.
New Jersey	YES	YES	NO	YES	YES	YES	A temporary immigration status DL or ID. The expiration date is less than the normal expiration date.
New Mexico	NO	NO	NO	NO	NO	NO	We do not issue temporary DL or ID.
New York	NO	NO	NO	NO	NO	NO	
North Carolina	NO	NO	NO	NO	NO	NO	
North Dakota	NO	NO	NO	NO	NO	NO	
Ohio	YES	YES	YES	YES	YES	YES	
Oklahoma	NO	NO	NO	NO	NO	NO	
Oregon	NO	NO	NO	NO	NO	NO	
Pennsylvania	YES	YES	YES	YES	YES	YES	Law allows (may) them to flag the document for a non-citizens. If done, is tied to the end of stay.
Rhode Island							
South Carolina	YES	YES	YES	YES	YES	YES	SC issues a paper temporary document, pending document verification for these reasons. The paper document is valid for 60 days.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-10	Issue temporary DL/ID to applicants who present:												
	valid, unexpired non-immigrant Visa		non-immigrant Visa status form		pending application for asylum		pending or approved application for temporary protected status		approved deferred action status form		pending application for adjustment of status		Notes
Jurisdiction													
South Dakota	YES		NO		NO		NO		NO		YES		A. With appropriate immigration document; F: On a case by case basis. We work closely with immigration services to determine if a person is here legitimately.
Tennessee	NO		NO		NO		NO		NO		NO		
Texas	NO		NO		NO		NO		NO		NO		Do not issue temps.
Utah	-		-		-		-		-		-		Haven't seen #B-F
Vermont	YES		YES		YES		YES		YES		YES		Do not issue a temporary card document. Issue a paper temporary document valid for 30 days for all of a-f and issued for follow-up purposes.
Virginia	NO		NO		NO		NO		NO		NO		
Washington	NO		NO		NO		NO		NO		NO		
West Virginia	NO		NO		NO		NO		NO		NO		Only issue a temporary paper document when the system is down for renewals and is valid for 14 days for DL. Issue an ID paper document if they need more time to verify the applicant. Is stated in law. Not done very often.
Wisconsin	NO		NO		NO		NO		NO		NO		
Wyoming	NO		NO		NO		NO		NO		NO		WY issues a temporary paper document to all applicants during the review of applicants through the central issuance process.
District of Columbia	YES		YES		NO		YES		YES		YES		
	Y	N	Y	N	Y	N	Y	N	Y	N	Y	N	
	13	33	12	34	12	34	12	34	12	34	15	31	

Summary: Most jurisdictions do not issue a temporary DL/ID to applicants who submit out-of-the norm immigration documentation.

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SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-11	Temporary DL/ID is valid for the period of time of the applicant's authorized stay in the U.S.	Notes
Jurisdiction		
Alabama	YES	
Alaska	N/A	
Arizona	YES	
Arkansas	N/A	
California	N/A	
Colorado	YES	
Connecticut	N/A	
Delaware	N/A	
Florida	N/A	
Georgia	N/A	
Hawaii	NO	
Idaho	N/A	
Illinois	YES	If it's a temporary driver's license (TVDL). But if have an SSN regardless of length of authorized stay, the regular DL is valid for 4 years and the regular ID is valid for 5 years.
Indiana	N/A	
Iowa	N/A	
Kansas	NO	Have no end of stay requirement.
Kentucky	YES	
Louisiana	YES	NGMV will have variable expiration date capability.
Maine		
Maryland	N/A	
Massachusetts	N/A	
Michigan	N/A	
Minnesota	YES	See 'status check date' above.
Mississippi	NO	
Missouri	N/A	
Montana	N/A	
Nebraska	NO	
Nevada	YES	
New Hampshire	YES	
New Jersey	YES	Add an additional 90 days.
New Mexico	N/A	
New York	N/A	
North Carolina	N/A	
North Dakota	N/A	
Ohio	YES	
Oklahoma	NO	
Oregon	N/A	
Pennsylvania	N/A	
Rhode Island		
South Carolina	NO	
South Dakota	YES	Pending application for change of status may 'take up to a year or more' to process. We issue temporary licenses during pending application good through date provided by immigration services in the 'pending application' letter from immigration services.
Tennessee	N/A	
Texas	N/A	
Utah	N/A	Not at this time, but pending governor's signature
Vermont	N/A	
Virginia	N/A	
Washington	N/A	

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-11	Temporary DL/ID is valid for the period of time of the applicant's authorized stay in the U.S.	Notes
Jurisdiction		
West Virginia	N/A	
Wisconsin	N/A	
Wyoming	N/A	
District of Columbia	N/A	Flexible. Depends on the circumstance

Summary: See notes above.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-12	With no definite end to the period of authorized stay, DL/ID is valid for:	Notes
Jurisdiction		
Alabama	N/A	It's always tied to end of stay of the immigration document.
Alaska	5 years	
Arizona	5 years	But under review with regard to permanent status
Arkansas	4 years	
California	5 years DL; 6-10 years ID	5 years for DL; 6 for ID cards, 10 for senior ID cards
Colorado	5-10 years	10 years if 21-65 years old; 5 years if 65 and older.
Connecticut	N/A	
Delaware	N/A	
Florida	N/A	
Georgia	N/A	
Hawaii	N/A	There are no restrictions on length of validity provided SSA assures they are here legally and are not eligible for a SSN.
Idaho	N/A	
Illinois	3 years	A Temporary Visitor's Driver License (TVDL) is good for length of stay or 3 years whichever is shorter.
Indiana	N/A	
Iowa	2 years	-
Kansas	4-6 years	Under 21 or over 65 - 4 yrs; otherwise 6 yrs.
Kentucky	2 years	This almost never happens because if you dig deep enough you can find an immigration document with a date.
Louisiana	4 years	
Maine		
Maryland	-	
Massachusetts	N/A	
Michigan	N/A	
Minnesota	4 years	Until the 'Status check date' or good for six months and this can be extended. An asylee or refugee gets a regular 4 year license. Pendency becomes 'status check date' (considering immigration processing time) based upon letter from immigration. If 'status check date' exceeds 4 year license, they still have to renew, but status check date carries over.
Mississippi	1 year	
Missouri	1 year	This will apply as of July 1st '05. If immigration documents DOS (duration of stay date) is all that is provided, we will give one year expiration and applicant must come in every year to renew.
Montana	8 years	Pro rate up to 21. 21 - 67 is 8 years validity. After that again pro rate. Maximum of 8 years. After 75 validity of 4 years
Nebraska	5 years	Our licenses are good for 5 years regardless of end date
Nevada	4 years	4 yr default is placed on record, and then they must present BCIS docs that show legal presence
New Hampshire	5 years	5 years and is tied to the expiration of the DL/ID.
New Jersey	1 year + 90days	1 year plus 90 days as of October 2004 from the day they are issued the document.
New Mexico	N/A	
New York	N/A	
North Carolina	N/A	
North Dakota	N/A	
Ohio	4	
Oklahoma	4 years	
Oregon	8 years	Oregon is not a legal presence state and does not issue temporary licenses/ID cards. We issue an 8 year license or identification card
Pennsylvania	N/A	
Rhode Island		

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-12	With no definite end to the period of authorized stay, DL/ID is valid for:	Notes
Jurisdiction		
South Carolina	N/A	Valid for no less than a year.
South Dakota	5 Years	On asylees and refugees the end of stay says 'indefinite'. We give them 5 years (regular SD license term of validity). We need this issue of asylees and refugees to be addressed.
Tennessee	N/A	
Texas	6 years	
Utah	5 years DL; 10 years ID	
Vermont	N/A	
Virginia	N/A	
Washington	5 years	
West Virginia	N/A	
Wisconsin	N/A	
Wyoming	N/A	
District of Columbia	NO	
Summary: See notes above.		

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-13	Temporary clearly indicates that it is temporary and states the date on which it expires	Notes
Jurisdiction		
Alabama	NO	It does not say 'temporary'. The license identifies the person as a foreign national (FN at top of license) and the expiration date is clearly visible.
Alaska	N/A	
Arizona	YES	It has a unique expiration date.
Arkansas	NO	
California	N/A	
Colorado	YES	
Connecticut	N/A	
Delaware	N/A	
Florida	N/A	
Georgia	N/A	
Hawaii	N/A	
Idaho	N/A	
Illinois	YES	
Indiana	N/A	
Iowa	N/A	-
Kansas	YES	
Kentucky	YES	The card does not indicate 'temporary'. The expiration date is the indicator because it is less than 4 years.
Louisiana	NO	The card will have a variable expiration date but will not say 'Temporary' unless DLA requires it.
Maine		
Maryland	-	
Massachusetts	N/A	
Michigan	N/A	
Minnesota	NO	Status check date' is highlighted. The card does not say 'temporary'. Minn. retailers and law enforcement have been educated to look for 'status check date' but out of state may not recognize it.
Mississippi	YES/NO	The card does not say 'temporary'. It says 'Non-US Citizen'. On the back it says it is not transferable to another state. Yes on expiration date (one year).
Missouri	N/A	
Montana	NO	
Nebraska	NO	
Nevada	N/A	
New Hampshire	YES	The document is a bright yellow paper.
New Jersey	YES	
New Mexico	N/A	
New York	N/A	
North Carolina	N/A	
North Dakota	N/A	
Ohio	YES	Non transferable non renewable. And states date.
Oklahoma	NO	
Oregon	N/A	
Pennsylvania	N/A	
Rhode Island		
South Carolina	NO	
South Dakota	NO	The card doesn't indicate it is a temporary, but does indicate an expiration date. It looks like a regular SD license.
Tennessee	N/A	
Texas	N/A	
Utah	NO	It will
Vermont	N/A	

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-13	Temporary clearly indicates that it is temporary and states the date on which it expires	Notes
Jurisdiction		
Virginia	N/A	
Washington	N/A	Any temp issued is a paper temp that cannot be used for identification
West Virginia	N/A	
Wisconsin	N/A	
Wyoming	N/A	
District of Columbia	YES	

Summary: See notes above.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-14	Temporary can be renewed only upon presentation of valid immigration documents that the status of stay has been extended by DHS	Notes
Jurisdiction		
Alabama	YES	They start all over again. It is not considered a renewal. It's a re-application.
Alaska	N/A	
Arizona	YES	
Arkansas	NO	
California	N/A	
Colorado	YES	
Connecticut	N/A	
Delaware	N/A	
Florida	N/A	
Georgia	N/A	
Hawaii	N/A	
Idaho	N/A	
Illinois	YES	
Indiana	N/A	
Iowa	N/A	-
Kansas	NO	Don't deal with end of stay
Kentucky	YES	
Louisiana	YES	In the coming NGMV system. Not presently.
Maine		
Maryland	-	
Massachusetts	N/A	
Michigan	NO	
Minnesota	YES	
Mississippi	YES	
Missouri	N/A	
Montana	NO	
Nebraska	NO	
Nevada	N/A	
New Hampshire	YES	
New Jersey	YES	
New Mexico	N/A	
New York	N/A	
North Carolina	N/A	
North Dakota	N/A	
Ohio	YES	
Oklahoma	YES	
Oregon	N/A	
Pennsylvania	N/A	
Rhode Island		
South Carolina	YES	
South Dakota	YES	
Tennessee	N/A	
Texas	N/A	
Utah	N/A	Probably, pending governor's signature
Vermont	N/A	
Virginia	N/A	
Washington	N/A	
West Virginia	N/A	
Wisconsin	N/A	
Wyoming	N/A	
District of Columbia	YES	

Summary: See notes above.

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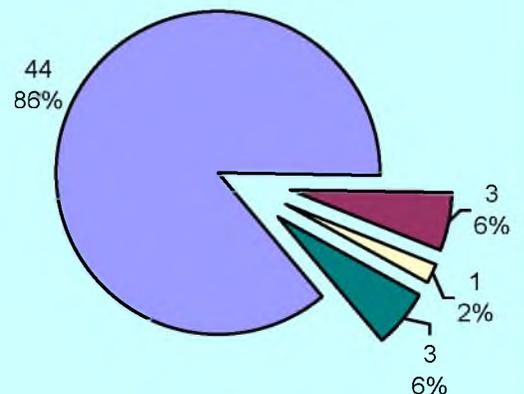
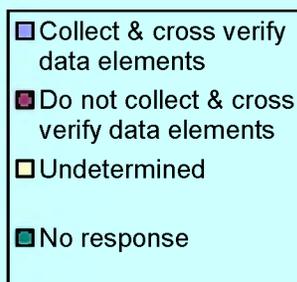
SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-15	Collect and cross verify data elements	Notes
Jurisdiction		
Alabama	YES	Name, date of birth and SSN
Alaska	YES	All elements
Arizona	YES	All elements, including legal presence
Arkansas	NO	We do collect but do not cross verify data.
California	YES	Name, DOB, SSN
Colorado	YES	All elements.
Connecticut	YES	Cross verify SSLOV and proof of address. Cross verify manually as well with documents and the application.
Delaware	YES	SSN, DOB, Name, etc. Also cross verify documents manually and addressed through fraud training.
Florida	YES	Mainly a manual process.
Georgia	YES	Manually through document review.
Hawaii	YES	Upon physical review of documents. Name, date of birth, SSN
Idaho	YES	All
Illinois	YES	Name, Date of Birth, SSN
Indiana	YES	Name, Date of Birth, SSN
Iowa	NO	Iowa has a primary and secondary list for documents and requires that the primary document must have full name and DOB.
Kansas	YES	All elements
Kentucky	YES	We try to cross verify name, DOB and SSN on everything we do. We check it against prior records, too.
Louisiana	YES	Date of birth and SSN with SSOLV
Maine		
Maryland	YES	SSOLV and SAVE and by looking at all documents provided at time of application. Full Name, DOB, SSN, address (standardization program - USPS)
Massachusetts	YES	Through SSOLV. Will cross verify manually with documents presented. Also check to make sure the person is not already in the system to ensure that multiple records are not created for the same person.
Michigan	YES	We will be using SSOLV.
Minnesota	YES	Between the initial application and the review that takes place, and with comparisons between primary and secondary documents, cross verification takes place on name, DOB, SSN and other.
Mississippi	YES	Name, DOB, SSN. We require a legal document for a name change, i.e., court order. If the married name is only on the marriage certificate and the social security card for example, these are not legal documents and we will use the name on the birth certificate instead. They must have a legal document to support the name change.
Missouri	YES	Name and DOB are cross referenced with internal files. The SSN is verified with SSOLV
Montana	YES	Through paper documents and SSN batch. Name, DOB, SSN, gender, mailing and residency address, physical description.
Nebraska	YES	Name, date of birth, SSN, Driver License number
Nevada	YES	All
New Hampshire	YES	With SSOLV and database matches names. Staff will also cross verify elements on documents.
New Jersey	YES	Cross verify name and SSN. DOB across documents. Train employees to cross verify the documents in document review stage.
New Mexico	YES	Collect all three and verify SSN.
New York	YES	Via the documents and systems checks. Store on file the image and the data elements. Can then cross check within the systems.
North Carolina	YES	Names are cross-matched against other names in the database. Cross verify through SSOLV. Also manually with documents that are presented. This is addressed in the fraud training program.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-15	Collect and cross verify data elements	Notes
Jurisdiction		
North Dakota	YES	Name, DOB and SSN. If a primary document is submitted, that is the only document we use. We cross check the name and DOB with SSOLV; also name and DOB that may come up on PDPS and CDLIS. In the event of name changes we cross check between all documents presented, so we can connect the dots.
Ohio	Not sure	Will be answered as soon as possible
Oklahoma	NO	Collect Name, DOB, SSN, demographic and personal information.
Oregon	YES	
Pennsylvania	YES	When married person names do not match, they must provide a marriage certificate.
Rhode Island		
South Carolina	YES	Through SSOLV. Also training employees to cross verify data elements when comparing documents.
South Dakota	YES	Name, DOB and SSN.
Tennessee	YES	SSOLV on name, DOB and SSN. Also manually with staff to cross verify among documents presented.
Texas	-	
Utah	YES	All elements
Vermont	YES	Verify the SSN. Also do this manually and address it in their fraud training program.
Virginia	YES	Through SSOLV and also cross verify manual during the document review
Washington	YES	Will have facial recognition in 2006-have photo and signature to verify in field now.
West Virginia	YES	SSN, manually and is address in fraud training.
Wisconsin	YES	SSOLV by 6/05 for SSN verifications. System will not allow transaction with invalid SSN or if it matches one already in system. Same for name and DOB
Wyoming	YES	Through SSOLV and SAVE. Internal systems checks WY records as well. Examiners will cross reference documents presented. SSOLV is the first search on the transaction.
District of Columbia	YES	

Summary: A majority of jurisdictions collect and cross verify data elements.



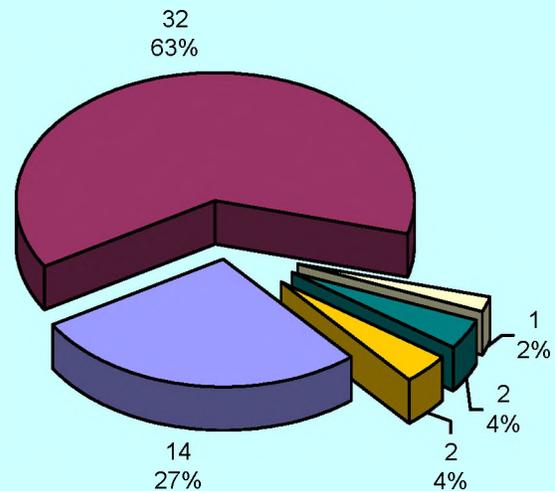
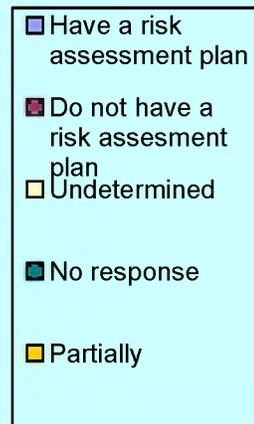
SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-16	Have a risk assessment plan	Notes
Jurisdiction		
Alabama	NO	We're not going to do that. We don't have money or personnel to do it.
Alaska	NO	
Arizona	YES	
Arkansas	NO	
California	YES	
Colorado	YES	It is informal-a security task force has been formed to formalize a plan.
Connecticut	NO	Are considering developing one.
Delaware	NO	AAMVA should develop a model risk assessment.
Florida	NO	
Georgia	NO	
Hawaii	NO	
Idaho	YES	
Illinois	NO	We plan to undertake a 'threat assessment' for when we re-new our contract in 2007. We will start the threat assessment very, very soon.
Indiana	NO	We do have 2 person application processing. Foreign documents are sent to central office for review.
Iowa	NO	Iowa does not a formal internal risk assessment plan. The risk assessment is a part of the report that is provided by the state audit process. Iowa plans to implement an internal risk assessment plan within the office of driver services which is a department within the DOT motor vehicle division.
Kansas	YES	
Kentucky	NO	We have an informal plan. We have identified weaknesses through a review that was done last year.
Louisiana	NO	
Maine		
Maryland	Not sure	Needs to be checked with internal audit division.
Massachusetts	YES	Have a formal written assessment plan.
Michigan	YES	We conduct a biennial review assessing risk areas.
Minnesota	NO	We are looking at it in IMDLIS process which is on going. It would be in final segment of IMDLIS project.
Mississippi	NO	
Missouri	NO	
Montana	NO	
Nebraska	NO	
Nevada	YES/NO	NOT 100%. DO NOT COVER APPLICANT OR TESTING PROCESS.
New Hampshire	NO	Working to implement. AAMVA should develop a model. Should look at the militaries risk assessment plan/process.
New Jersey	YES	NJ follows the Committee of Sponsoring Organization (COSO) – to asses risk management needs. Done annually. Is done for the whole state.
New Mexico	NO	
New York	YES	
North Carolina	YES/NO	Do not have a written risk assessment plan but is a part of the fraud control procedures. Have done some risks assessments. Have done some evaluations. Are in the process of developing a formal risk assessment plan for all NC DOT operations. Have risk assessment plans for all IT systems.
North Dakota	NO	Not a written plan. We do have some internal controls in place but not a plan in writing – Appendix 03.4.3-03
Ohio	NO	In practice OH continuously looks at improvements.
Oklahoma	NO	
Oregon	NO	We have recently hired a Governmental Auditor that will be developing a risk assessment plan.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-16	Have a risk assessment plan	Notes
Jurisdiction		
Pennsylvania	YES	Have a Risk Management Director and staff. Have a formal risk assessment plan to identify areas/processes where potential risks exist. Risk assessments are done annually (5-7) by the Office of Risk Management. Recommendations from the risk assessments are implemented as appropriate.
Rhode Island		
South Carolina	NO	Are looking at developing a plan.
South Dakota	NO	
Tennessee	NO	Are evaluating the development of a risk assessment plan. AAMVA should develop a model.
Texas	NO	Will have.
Utah	NO	
Vermont	NO	Agree in concept with the risk assessment plan. Are working internally to develop a risk assessment plan. VT would like AAMVA to develop a model guideline for developing a risk assessment plan.
Virginia	YES	Not specific to DL/ID
Washington	YES	
West Virginia	NO	
Wisconsin	YES	
Wyoming	NO	AAMVA should develop a model risk assessment plan.
District of Columbia	YES	

Summary: Most jurisdictions do not have a risk assessment plan.



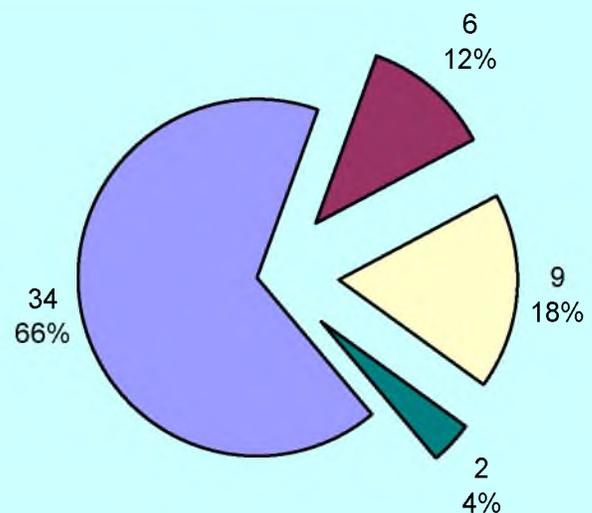
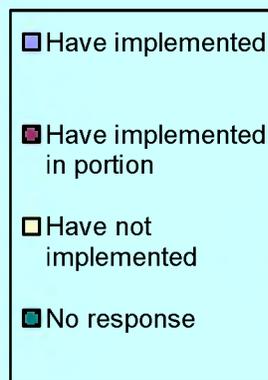
SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-17	Implemented appropriate fraud prevention and detection systems	Notes
Jurisdiction		
Alabama	YES	We have facial recognition and FDR training. We do SSOLV and NCIC verification checks. We issue fraud detection kits to examiners.
Alaska	YES/NO	Minimal. Not enough because we haven't adopted AAMVA's FDR program
Arizona	YES	
Arkansas	YES	We don't know how you can ever be good enough.
California	YES	
Colorado	YES	
Connecticut	YES/NO	Continue to make improvements.
Delaware	YES	Partially. Have digital imaging system. Utilize one-to-one. Can do one-to-many but are not permitted right now. Same with fingerprints as well. Internal database does matching with application/applicants.
Florida	YES	FL continues to be proactive in preventing fraud. FL is piloting a web base application that the examiner can issue a temporary document if there is the potential for fraud and an alert is then sent to the fraud unit. The documents can be looked at as they are scanned and security video tape can be viewed.
Georgia	YES	Require finger prints form all drivers. Do one to one verification for every re-issuance event. Have the ability to do one to many searches to determine if an applicant has multiple documents.
Hawaii	NO	Only the computer system
Idaho	YES	
Illinois	YES	We use automated testing. We use SAVE & SSOLV. We have face recognition, etc.
Indiana	NO	We don't think we've done everything we can do.
Iowa	YES	Iowa has an overall system for fraud prevention. With all of the elements that have been put into place and the addition of systems that are in design. The new system is being designed to do photo first. The County Treasurers are so small that they are doing the photo and application at the same time. To do photo first may not happen in the County Treasurer's office.
Kansas	YES	
Kentucky	NO	They are appropriate for the ability we currently have. To monitor and control fraud based upon the way we are organized – de-centralized. We have identified areas needing improvement and have taken some major steps to make improvements. We're working hard to make improvements.
Louisiana	YES	NGMV will add some enhancements: example: when re-issuing a credential (DL or ID), the initial inquiry screen will contain the last digital photo image of that customer prior to any updates to assure we have the correct customer present.
Maine		
Maryland	YES	
Massachusetts	YES/NO	MA continues to make improvements.
Michigan	YES	We feel like we could be doing more. Verifiability is an issue. We're trying to do more data mining. Systems could be improved with electronic verifications.
Minnesota	YES	For the way we have our processes set up now. As we move forward, we can add to our information system as needed.
Mississippi	NO	We don't have the resources.
Missouri	YES	Appropriate as defined by MO.
Montana	NO	Is looked at in the reengineering process. There is awareness.
Nebraska	YES	We've done extensive fraud training and will do more in October. We have issued UV lights and magnifying glasses to all our examiners. We've had contact with local law enforcement in a lot of our offices who will assist with confiscation when fraudulent documents are found. The interactive DL system can be marked 'possible fraud' for specific documents.
Nevada	YES	Have procedures, training and a compliance enforcement fraud unit
New Hampshire	YES	Continue to make improvements. In the process of extending the current contract and will be making improvements.
New Jersey	YES	A number of measures in place to prevent fraud such as camera-monitors, etc. Electronically check areas of concerns such as duplicates. Scrutinize certain transactions. Have fraud document investigators. DMV staff will follow up on certain transactions. Partnership with LE and staffing offers support. Work closely with the FBI, all municipalities and prosecutors offices. Have uniform officers in 29 of the 45 offices.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-17	Implemented appropriate fraud prevention and detection systems	Notes
Jurisdiction		
New Mexico	NO	Appropriate-no. Staffing has held us to reactive measures rather than proactive action.
New York	YES	Have built in logic programming into the system. The system looks for incompatibilities. Looks for numbers that the SSA would have never issued. Use security cameras in some of the office. Have increased the number of investigators and have a presence in the offices. They have the authority to make an arrest. 600% increase in arrest since 2000.
North Carolina	YES/NO	Will tie end of stay later this year. Continue to make improvements. Working to more formalize the entire risk assessment plan. Also implementing a new system for NC's facial recognition system for one-to-many and one-to-one match. One-to-one is real time. One-to-many will run overnight. Will greatly improve the fraud detection system. Have already made a number of arrests due to facial recognition. NC has 17M images on the system already. Are using their historical database for images.
North Dakota	YES	(What is 'appropriate'?) We utilize AAVMA FDR training and cameras at 8 major locations.
Ohio	YES	
Oklahoma	YES	Still working on improvements to come up to DLA requirements level.
Oregon	NO	We are beginning to work on this area. We have recently hired a Governmental Auditor that will be developing a risk assessment plan.
Pennsylvania	YES	Electronic driver verification systems requires that it be done and provides an audit trail. PA continues to look for ways to prevent and detect fraud.
Rhode Island		
South Carolina	NO	Are in the process and continue to make improvements.
South Dakota	YES	
Tennessee	YES	Have implemented fraud prevention efforts in a number of areas and TN continues to make improvements.
Texas	YES	
Utah	YES	
Vermont	YES/NO	Continue to work to improve fraud prevention systems.
Virginia	YES/NO	
Washington	YES	
West Virginia	NO	Continue to improve fraud detection systems.
Wisconsin	YES	That is an on-going thing. We are implementing a new card contract and are working with the vendor to implement fraud prevention measures (facial recognition; controls for what employees can do (example - overrides. Who has done over rides? - reporting system). We have a pilot to mail original licenses to those 18 or over.
Wyoming	YES	Continue to make improvements.
District of Columbia	YES	

Summary: Most jurisdictions indicate they have implemented appropriate fraud prevention and detection systems.



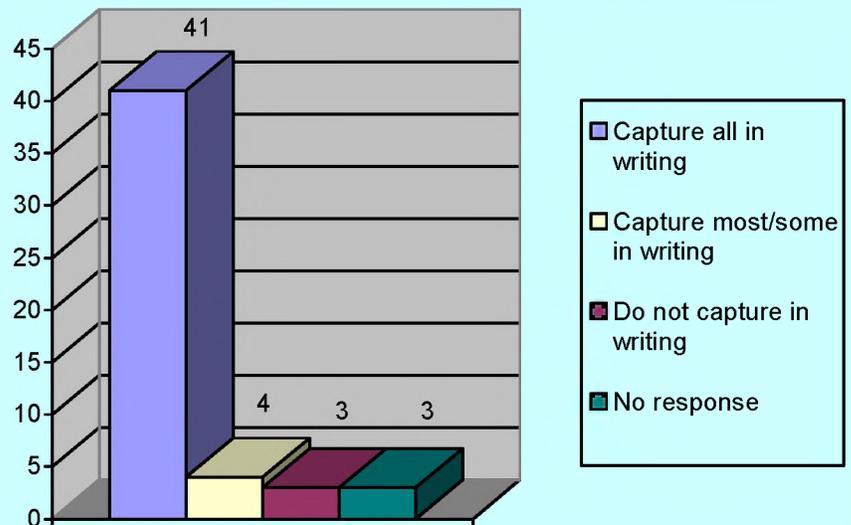
SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-18	Capture all procedures and business processes in writing	Notes
Jurisdiction		
Alabama	YES	Our manual is being upgraded. We will submit it when it's finished.
Alaska	YES	
Arizona	YES	
Arkansas	YES	We will provide documentation to AAMVA
California	YES	
Colorado	YES	
Connecticut	YES/NO	Do not have all in writing but have a majority. Continue to make improvements. Have set up a new bureau, a document integrity unit.
Delaware	NO	Do not have a formal procedures manual. Have a central file for memos and emails. Are going to be improving their business process in writing. If it is required to be in writing it is in writing, mostly in the IT area. Called design documents for internal and external procedures.
Florida	YES	Have procedures/examiners/procedures manuals
Georgia	YES	Utilize a procedures/examiners manual
Hawaii	NO	
Idaho	-	
Illinois	YES	These are contained in our Field Operations manual, ID manual, training notebook, and security manual that's in process (incomplete). We will send these to AAMVA.
Indiana	YES	This will be centralized and put on the Intranet when our new computer system becomes operational.
Iowa	YES	Through the formal Iowa Examiner's Manual.
Kansas	YES	Mostly-still working on it.
Kentucky	YES	We have a circuit court clerks' manual and send out policy updates.
Louisiana	YES	We will send our website to AAMVA.
Maine		
Maryland	YES	
Massachusetts	YES	Have established policies and send training updates. Employees are provided with written copies of what employees need for their job function.
Michigan	YES	We will provide documentation to AAMVA.
Minnesota	YES	It is part of our IMDLIS project. It was not done as consistently in the past. Probably couldn't send this large volume of policies and procedures. We are not at a point in time where we could compile that. We are using limited resources to focus on getting off the mainframe. Could perhaps send it in the next fiscal year.
Mississippi	YES	We will send documentation to AAMVA.
Missouri	YES	There may be a few things we do that aren't written down anywhere. We will send a copy to AAMVA.
Montana	YES	Will send information.
Nebraska	YES	We will send our Driver License Examiner manual and our computer manual to AAMVA.
Nevada	YES	
New Hampshire	YES	Have written standard operating procedures.
New Jersey	YES	Have a procedure manual. Also have a dynamic manual for the processing of non-citizens do to the constant changes.
New Mexico	YES	Most definitely.
New York	YES	
North Carolina	YES	DL Examiner Manual
North Dakota	YES	We have all except a risk assessment. They're contained in policy and procedures, and Administrative Rules
Ohio	YES	
Oklahoma	YES	A revised manual will be completed in several months. Will send AAMVA a copy.
Oregon	NO	Many of our procedures and business processes are in writing but not all. Field Services estimates 95% of their procedures for DL/ID issuances are in writing.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-18	Capture all procedures and business processes in writing	Notes
Jurisdiction		
Pennsylvania	YES	Through the procedures that are available to employees on-line and updated are distributed on-line as well.
Rhode Island		
South Carolina	YES	Capture most. They are posted on their intra-net
South Dakota	YES	It is currently being revised and is out-dated so we will not be able to send copies until the revisions are completed.
Tennessee	YES	In process of documenting all process. Have a contract with an outside firm to do an evaluation of the business processes to evaluate the procedures and business processes.
Texas	YES	
Utah	YES/NO	Not all, but most
Vermont	YES	Processes are contained within 35 three ring binders. (too big to mail and I send relevant sections)
Virginia	YES	Most all in writing. Is in a procedures manual for employees. Is updated when needed. Send emails and have bulletin board to update them on new procedures. Employees are required to view the bulletin board when they log on.
Washington	YES	
West Virginia	YES/NO	Some are in writing but not all.
Wisconsin	YES	Wisconsin has a standard exception process procedure that involves a supervisor/manager and certification of name and DOB- MV3002 form. 99% of exception procedures handled with this process. Other 1% are not documented. All are case by case, but most use standard documented exception process
Wyoming	YES	Driver Services Examiners Manual.
District of Columbia	YES/NO	Not all. Provided to employees in a manual.

Summary: Most jurisdictions indicate they capture all procedures and business processes in writing.



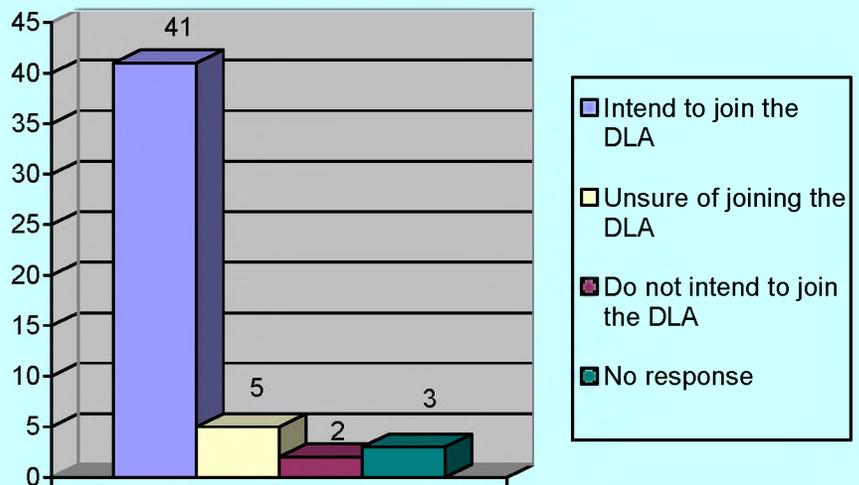
SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-19		
Jurisdiction	Intend to become a member of the DLA	Notes
Alabama	YES	The Director has authority to join. Just because we join DLA, doesn't mean we will abide by all requirements of DLA.
Alaska	YES	July 2006 has been recommended
Arizona	YES	Not sure when. It will require legislation.
Arkansas	YES	We do not know how soon. We just got legislation passed out of the House and Senate that would authorize joining. We are waiting for Governor's signature. (Joining is done administratively)
California	YES	Not sooner than 2006. Must pass legislation
Colorado	YES	Depends on legislation and administrator's direction
Connecticut	YES	Have passed legislation
Delaware	YES	Hope there are some changes made to the procedures manual.
Florida	Unsure	Depends on the FL legislature / managers will recommend it.
Georgia	NO	GA supports the concept of the DLA. There have been some legal issues. GA can not buy into some of the legal issues tied to the DLA. Issues with who they can share information with and who they can suspend. Will be difficult to get the legislature to enact the DLA. Would like to eventually participate.
Hawaii	NO	We couldn't comply with all requirements of the enhanced DLA (residency among other requirements). We get a lot of Asian business people who bring their wives. They are the ones who lobbied for waiver of proof of residence.
Idaho	-	
Illinois	YES	To the degree that we can afford it. We don't know when.
Indiana	Unknown	
Iowa	YES	Had hoped to introduce DLA legislation next year. Not sure at what point they will introduce legislation.
Kansas	YES	Considering it, we feel that we comply in a large part now.
Kentucky	YES	If it's federally mandated
Louisiana	YES	Our agency wants it as soon as it is offered. But it will be a political decision.
Maine		
Maryland	Unknown	Defer to administrator. Some elements make it difficult to sign on
Massachusetts	YES	If they can comply with all of the terms and conditions.
Michigan	YES	It depends on when we can get legislative authority. We're working towards joining. Whenever we do programming, we try to include requirements of the DLA.
Minnesota	YES	The agency is supportive but, in terms of passing legislation, we need to make sure our Governor and Commissioner are supportive. Can't predict when.
Mississippi	Unknown	We are waiting for a 'final' version to see what is included.
Missouri	YES	It is our 'intent' to join. We're going through an administration change and have not reviewed this with the new administration. We completed an AAMVA survey and some 'minimum' DLA requirements are way out there – require system changes or legislation.
Montana	YES	Aim is to introduce legislation in 2007 session to become member.
Nebraska	YES	No idea when.
Nevada	YES	Not sure, still working on a couple compliance issues
New Hampshire	YES	Waiting on outcome at federal level.
New Jersey	YES	Are seriously looking at the DLA. Feel we meet most of the requirements. Will need federal funding.
New Mexico	YES	Most definitely.
New York	YES	2-3 years – depends on the legislatures
North Carolina	YES	Would like to but contingent upon legislative approval.
North Dakota	YES	Unsure when
Ohio	YES	In about a year
Oklahoma	YES	When the DLA is final, we will start the process to become compliant (w/in 2 yrs).

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-19	Intend to become a member of the DLA	Notes
Jurisdiction		
Oregon	YES	This will depend on legislation though.
Pennsylvania	YES	Hope to join the DLA. Would be dependent upon legislature. Would like to see more flexibility than rigidity.
Rhode Island		
South Carolina	Unsure	Would like to. TBD
South Dakota	YES	Only if Asylee and refugee issue is addressed. We can't say how soon. We also have an issue with name capture – 125 characters.
Tennessee	YES	Are working towards meeting the standards of the DLA, which would allow TN to join, but have issues at this point.
Texas	YES	How soon will depend on federal legislation. Need to be federally mandated on legal presence before that will happen in Texas.
Utah	YES	Would like to
Vermont	YES	Would like to eventually. Conceptually support the DLA. Concerns about impacts on work loads. DRIVeRS is needed.
Virginia	YES	Are awaiting the final requirements to make the determination and before committing.
Washington	YES	But legal presence will be an issue-that will determine when.
West Virginia	YES	Not sure when
Wisconsin	YES	The agency recommended it to the Governor but the Governor did not include it in his budget proposal. We don't know what the legislature will do. If required by federal law, our legislature generally chooses to do it.
Wyoming	YES	Once it is finalized WY will evaluate. Could take a year or two to get through legislature.
District of Columbia	YES	Are ready when the DLA is ready.

Summary: Most jurisdictions indicate they intend to become a member of the DLA.



SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-20	Processing standards and procedures meet or exceed the requirements developed by the DLA and AAMVA Security Framework	Notes
Jurisdiction		
Alabama	YES	Training? Yes; We have control measures in place. We exceed the Acceptable Verifiable Resource List. AAMVA is not going to tell us how to do business. We think the recommendations they have made are good, but we are not going to be tied to them.
Alaska	NO	
Arizona	YES/NO	For the most part accept membership in DLA
Arkansas	NO	We are doing some of each, but not all.
California	YES	Yes, with the exception of fully implementing #1, #10, #11, #3 and several of those are being implemented or will be soon. Many of the card specifications will be included when the new card contract is implemented.
Colorado	YES/NO	Most meet except on length of name field, common OVD, vertical format and pink stripe.
Connecticut	YES/NO	Some but not all and continue to make improvements.
Delaware	YES/NO	Meet some but not all.
Florida	YES/NO	Most
Georgia	YES/NO	Meet most but not all, such as the audit plan.
Hawaii	NO	
Idaho	YES/NO	Most of them-not #11 because it is a legislative issue
Illinois	YES/NO	See original survey response.
Indiana	NO	We meet portions of them.
Iowa	NO	Working towards implementing the standards for processing applications for DL/IDs.
Kansas	NO	Getting closer. Not doing 1 and 3. Not completely compliant in a few other areas, but working on it.
Kentucky	NO	FDR – no; Control measures – no; audit plan – no; verification process – yes; acceptable resource list – no; electronic verifiability – yes; name collection – no; end of stay – yes; cross reference – yes; risk assessment – no, capture processes in writing – yes; membership in DLA – no.
Louisiana	NO	We have many of the components but not all at this time. Our NGMV will add more components. We have no control over systems, like electronic verifications being developed.
Maine		
Maryland	YES	All in all yes. Audit plan (?). Do not tie end of stay to license expiration.
Massachusetts	YES/NO	MA continues to make improvements.
Michigan	NO	We have done much of it, and are working towards the remainder.
Minnesota	NO	See previous question.
Mississippi	NO	We do much of it but not all of it.
Missouri	NO	See previous explanations. We're doing a lot of it but not all.
Montana	NO	
Nebraska	NO	<ol style="list-style-type: none"> 1. Need to increase # hours 5. Need an audit plan 7. Need to have DRIVeRS to access out of state license, status and histories. 8. Need to revise documents on our proof of ID list 9. Need access to additional verification systems for breeder documents. 10. Need to always capture full name including middle name 11. Need legislative authority to tie end of stay to expiration date. Recommendation 1: Need to develop s risk assessment plan Recommendation 3: Need to join the DLA.
Nevada	YES	Mostly
New Hampshire	YES/NO	Do not have a risk assessment plan.
New Jersey	YES/NO	

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-20	Processing standards and procedures meet or exceed the requirements developed by the DLA and AAMVA Security Framework	Notes
Jurisdiction		
New Mexico	YES/NO	From what NM has read and understood, about the DLA and DL/ID Security Framework, NM will have to address some portion via legislation or regulation. But for the most part, NM will implement ASAP.
New York	YES	Exceed the standards set by AAMVA
North Carolina	YES/NO	NC meets most of the standards and continues to make improvements. Working towards meeting all of the requirements.
North Dakota	NO	See original survey response.
Ohio	YES	Overall meet requirements.
Oklahoma	YES/NO	Meet requirements:1 and 11 Does not meet other requirements (3, 5, 7, 8, 9, 10, and 13). Meet recommendation 2. Does not meet other recommendations (1 and 3)
Oregon	NO	
Pennsylvania	YES/NO	Meet most of the standards. 125 characters for name collection is not met. Need some type of a non-commercial driver system.
Rhode Island		
South Carolina	YES/NO	
South Dakota	YES	See original survey response.
Tennessee	YES/NO	TN does not have a risk assessment plan and would like to see AAMVA develop a model.
Texas	NO	
Utah	YES/NO	Not all, but most
Vermont	YES / NO	Some of these, but not all of them.
Virginia	YES/NO	VA meets most standards.
Washington	NO	Resource list is different and no legal presence requirement.
West Virginia	YES/NO	Meet in some, exceed in some, working on other areas, such as audits, internal controls and risk assessment plan.
Wisconsin	NO	
Wyoming	YES/NO	For the most part WY meets the standards.
District of Columbia	YES/NO	Meet most.

Summary: Most jurisdictions do not meet, or partially meet, the processing standards and procedures developed in the DLA and AAMVA Security Framework.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-21 Jurisdiction	The minimum standard for the processing of applications for driver's licenses and personal identification cards should be:
Alabama	Facial recognition systems should be required as well as NCIC checks. Electronic document verification should be done when possible.
Alaska	Framework is sufficient. Would want to see further studies before doing more than that.
Arizona	Framework and DLA
Arkansas	We support the Framework.
California	Most importantly, all states should not accept any source document unless it is verifiable manually or electronically. All documents should be issued by U.S. government agencies with the exception of foreign passports.
Colorado	Framework has established good minimum standards.
Connecticut	Should be the DLA and the DL/ID Framework. CT thinks that the requirement should be not to issue to undocumented aliens. There should be a legal presence requirement.
Delaware	Should use biometric indicators. Need to have DRIVeS. Use systems for verification.
Florida	Will send additional information. FDR training is very important
Georgia	Biometrics should be included. Verification of identity documents should be required.
Hawaii	Standardized list of acceptable identity documents. Verify a license from other states using digital image exchange and DRIVeS. We need to have immediate verification from the federal agency which issued the documents.
Idaho	Laid out in DLA/Framework
Illinois	We support the security Framework.
Indiana	We support the Framework.
Iowa	As required by the AAMVA DL/ID Security Framework
Kansas	DLA standards, if everyone will comply
Kentucky	We are comfortable with the DLA and Framework.
Louisiana	We agree with DL/ID standards.
Maine	
Maryland	Security Framework. Base document should be immigration document or citizenship based. Better authentication of documents. Grandfathering/legacy system is an issue that needs to be addressed.
Massachusetts	If there is an electronic verification process available, states should peruse it, but if not they should not be required to verify. If states don't have an LE presence in the DMV there needs to be a process established for referrals to them. If the MVA identifies fraud, it is tough for them to do anything with it, need to refer to LE.
Michigan	We verify documents electronically. We retain copies of foreign documents used for original issues. We have a two person issuance process for high risk application (ex., duplicates with address changes, originals 18 and older). We have central license issuance vs. over the counter issuance. We use automated scrambled testing. We do foreign language testing to eliminate interpreters. We do digital image capture.
Minnesota	We support the Framework.
Mississippi	Background checks like we do for HAZMAT. Increase the cost of a DL appropriately. Do HAZMAT type fingerprinting for everybody.
Missouri	We think the question is redundant; we skipped to D
Montana	DLA agreement recommendations
Nebraska	We support the DLA and Framework. Just as importantly, we should require issuers of breeder documents to input the data and to meet same standards for proof of identity as we do.
Nevada	Framework. Again verification process needs to be reasonable.
New Hampshire	Needs to be minimum standards for the breeder documents. All issuing agencies and states need to use the same breeder documents.
New Jersey	Utilization of a 2 or 3 point check system for documents. Auditing would be more helpful.
New Mexico	99% verification of documents for first time applications; 99% secure documents; Real time verification of individual transferring from one jurisdiction to another; and one license and one record that follows individual.
New York	Total verifiable source documents. Should be standard procedures. Should be on-going training and refresher training. Standardized client data on all documents. Should be central issuance on all documents.
North Carolina	The AAMVA Framework represents what the minimum standard should be. Need to have background check for all employees. NC has been doing background checks for some time.
North Dakota	<ol style="list-style-type: none"> 1. Uniform security features easily recognized by all front line employees 2. Uniform machine readable features and efficient equipment for use at front counters. 3. DRIVeS system 4. Electronic verification of Birth Certificates, immigration documents and court documents 5. Interoperability between agencies or jurisdictions who share this information. Notify each other of changes.

SECTION C: The Act requires the development of standards for the processing of applications for driver’s license or personal identification cards to prevent fraud.

TABLE C-21	The minimum standard for the processing of applications for driver’s licenses and personal identification cards should be:
Jurisdiction	
Ohio	Training is important (FDR).
Oklahoma	DLA standard.
Oregon	<ol style="list-style-type: none"> 1) Employee training to detect fraudulent documents; 2) Processes and systems to prevent/detect employee fraud (e.g., separation of duties); 3) Routine audits of issuance procedures; 4) Document recognition and validation tools; 5) Ability to verify ID documents with the issuing agency through exception procedures 6) DRIVeRS pointer system 7) Hotline for tips from employees and public; and 8) Reciprocity agreements (DLA). 9) Increase penalties for submitting fraudulent applications of attempting ID fraud/theft; and 10) Provide federal funds to state/local agencies for enforcement and prosecution.
Pennsylvania	Identification documents should be restricted. On-line verification should be required, should be at least photo copying if not photo imaging of all source documents.
Rhode Island	
South Carolina	Needs to be a better verification process. Can be done on the front end and the back end. Front end only, would be difficult without additional resource. Issue the license and then revoke if fraudulent. Talking about a 100% verification of source documents. Can only be done on the backend.
South Dakota	We support the DL/ID Framework. We do not necessarily agree the formal audit plan and risk assessment need to be in writing. We are opposed to 125 character name requirement.
Tennessee	The DLA and the DL/ID Security Framework offers a good outline for the development of the new minimum standards.
Texas	DLA/Framework
Utah	AAMVA standard
Vermont	Need to have electronic verification.
Virginia	VA feels that the AAMVA DL/ID Security Framework could provide the minimum standards for; audit plan; name collection & maintenance procedures; tying end of stay to the expiration date of the DL/ID; risk assessment plan; and capture all procedures and business processes in writing. VA feels that the Framework could provide the minimum standard for the following with additional comments; (1) control measures – with the exception of 40 consecutive hrs. of forced leave. (2) verification process – need two person process; use available tested, proven online resources (unless cost prohibitive); and verify with issuing entity as necessary. (3) electronically verify data elements – require additional information regarding the requirements. (4) cross reference data elements – require additional information regarding the requirements.
Washington	Use multiple source documents; require proof of legal presence, verification of all source documents and data elements used in some way.
West Virginia	Need to be able to verify the documents presented. Need to make sure the documents are legitimate. Foreign documents need to be verifiable. Support the AAMVA framework. All states need to be on the same page.
Wisconsin	We like the idea of consistency and everyone using them (standards) and it is on our scope.
Wyoming	The standards should address establishing the identity of a first time applicant. Procedures need to be in place to establish that identity.
District of Columbia	Support the AAMVA Framework and the DLA.

Summary: Most jurisdictions support the *AAMVA Security Framework* and the DLA. Verification processes need to be improved. Biometrics needs to be considered. Jurisdictions should not accept source documents unless they can be verified, either manual or electronically. Jurisdictions should be pursue electronic verification where available. They should not be required to verify documents not capable of electronic verification nor be required to utilize systems that have not been certified to provide timely and correct information. Need to have interoperability between all issuing agencies.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-22	Comments to assist in the development of minimum standards for processing applications
Jurisdiction	
Alabama	-
Alaska	-
Arizona	Need online real time verification for everyone
Arkansas	-
California	See previous question
Colorado	-
Connecticut	Should be a legal presence requirement.
Delaware	Need systems! Need funding for systems.
Florida	FDR training needs to be considered.
Georgia	Funding needs to be provided to assist with biometrics and verification to be able to prevent fraud. GA is going to be transitioning to a central issuance state. Preparing an RFP to develop the new central issuance system. Central issuance is a key to preventing fraud as well.
Hawaii	-
Idaho	-
Illinois	-
Indiana	-
Iowa	Utilization of the AAMVA DL/ID Security Framework
Kansas	-
Kentucky	Collecting the photo up front and non-completion of the application process is information that needs to be shared between states. Especially when the license was declined for some reason.
Louisiana	-
Maine	
Maryland	See C3.
Massachusetts	Need to have appropriate funding. State should not be penalized if funding is not made available. Should not lose funding in other areas.
Michigan	Connectivity (DRIVERs) and funding are important issues.
Minnesota	The communication aspect is extremely important. Keep us all on the same page, talking points, etc. AAMVA could do a lot to improve communications. We need a well indexed on line manual so staff can find what they need quickly. It's very important for agents & examiners to be aware of changes and current versions (5 versions of surveys on web site). The AAMVA Website isn't kept as current as it should be. We have to look in too many places to find information and then not sure it is most current version.
Mississippi	-
Missouri	-
Montana	Happy with FDR training programs. Additional training programs to support jurisdictions. Web based training.
Nebraska	We need clearly defined legislation, like DLA model legislation and what comes out of the Negotiated Rulemaking process. We need federal money to build compliance systems.
Nevada	-
New Hampshire	Look at the various processes for breeder documents among issuing agencies. Costs and training need to be considered if mandated. Need to have appropriate time to implement.
New Jersey	Biometrics as a standard.
New Mexico	See C3.
New York	-
North Carolina	Need to have on-line verification systems including DRIVERs. Need to have funding to support the minimum requirements established.
North Dakota	See C3
Ohio	See C3
Oklahoma	Finalization and adoption of DLA. All states become member.
Oregon	See C3
Pennsylvania	On-line birth certificate verification. Resolve the issue of charges for the service. Costs are too high for this service. Must have a national non-commercial driver pointer system with photo exchange. A major SAVE upgrade so it can be accessed through a normal licensing process. Funding needs to be taken into consideration to assist states to meet these requirements.
Rhode Island	
South Carolina	SC is willing to do whatever is needed, but don't want to have a negative impact on customer service.

SECTION C: The Act requires the development of standards for the processing of applications for driver's license or personal identification cards to prevent fraud.

TABLE C-22 Jurisdiction	Comments to assist in the development of minimum standards for processing applications
South Dakota	We think we need a standardized way to require states to place an indicator on the record and DL to tell when a person is not a US citizen and has been issued a shorter term or temporary license.
Tennessee	Need time to implement new minimum standards and funding, especially with the on-line verification. Funding is also needed for training.
Texas	-
Utah	-
Vermont	Need to have funding for the electronic verification systems and to have DRIVeRS. Need to have funding in order to provide more time for training. The time allocation for fraud training is a major issue for VT. Would like to see the hours for fraud training reduced from 12 hours to 6-8 hours for initial training and an additional 6-8 hours annually. Allow jurisdiction to make the determination to use only the essential core content of the FDR program.
Virginia	-
Washington	-
West Virginia	More consistency with Federal documents and vital records. On-line renewal is not very secure in regards to address verification. AAMVA should look into this. You don't know who is living at this address and is vulnerable to identity theft.
Wisconsin	-
Wyoming	Need to have appropriate funding to support the requirements and to have systems developed.
District of Columbia	-
<p>Summary: Need to have appropriate funding to support and time to implement minimum requirements developed. Federal requirements will need to be clearly defined. Need to have online real time verification. Current systems need to be improved and need to resolve the issue of charges for services. The costs are very high for online verification services. FDR training can assist in the verification process.</p>	

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Section D

The Act requires the development of standards for information to be included on each driver's license or personal identification card, including (i) the person's full legal name, (ii) the person's date of birth, (iii) the person's gender, (iv) the person's license or personal identification card number, (v) a digital photograph of the person (vi) the person's address of principal residence, (vii) the person's signature.

SECTION D: The Act requires the development of standards for information to be included on each driver's license or personal identification card, including (i) the person's full legal name, (ii) the person's date of birth, (iii) the person's gender, (iv) the person's license or personal identification card number, (v) a digital photograph of the person (vi) the person's address of principal residence, (vii) the person's signature.

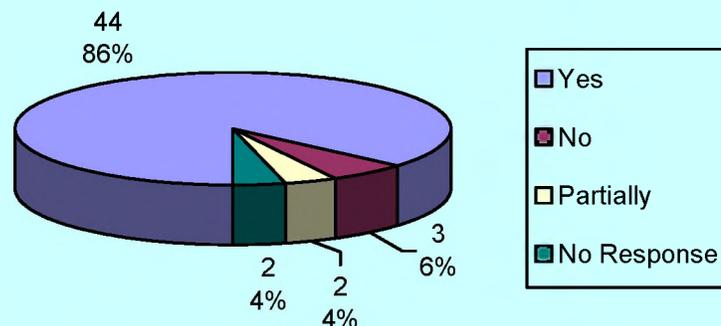
TABLE D-1	Have standards that require the data elements listed to be included on the DL/ID	Notes / Requirements are provided for by:
Jurisdiction		
Alabama	YES	By law
Alaska	YES	Law; but allows mailing address on face of card. The residence address is in database
Arizona	YES	Accept principle address. Maintain that address on the record but can use mailing address on card
Arkansas	YES	Law; We allow a middle initial instead of middle name. We don't have the data set that allows the full number of characters in card design specifications. Certified law officers can use a PO box for lawful residence.
California	YES	Law and Administrative Rule-except for displaying the principle residence address on the card. It is stored on the record, but a mailing address may be used on the card itself.
Colorado	YES	
Connecticut	YES	Procedure and Administrative Rule- Will carry the mailing address on file. Have difficulties with the full legal and foreign names because of the length.
Delaware	YES	Combination of all.
Florida	YES	Law- Require the mailing address on the card and maintain the primary address on file.
Georgia	YES	The mailing address is on the document and the residence address, if different, is in the system. Required by Law
Hawaii	YES	Law and Administrative Rule. Address of principal residence is not checked (verified). We require a full legal name (first, full middle and last name) but it doesn't always happen.
Idaho	YES	Law
Illinois	YES	Law and Rule; Our definition of 'legal name' does not include middle name. Our operational definition of "legal name" does not include middle name. Current state law requires full legal name and we believe it can be redefined operationally to include full first, middle, and last name without legislative changes.
Indiana	YES	Law
Iowa	YES	Required by Code, Rule and Procedure
Kansas	YES	Law
Kentucky	YES	Law
Louisiana	YES	Law (except FMCSA requires that the mailing address shows on front of CDL card). We capture resident address too for CDLs.
Maine		
Maryland	YES	Law
Massachusetts	YES	Law and Administrative Rule The physical address on the document and the mailing address is in the system.
Michigan	YES	The law requires what is to be included on the application but by policy we decide what is put on the card.
Minnesota	YES	Law
Mississippi	YES	Law Procedure and Rules
Missouri	NO	Law, Administrative Rule and procedure for those elements that we do comply with right now. We are not requiring full legal name. As of July we will not be making this exception, but space for characters is still an issue.
Montana	YES	Law Procedure
Nebraska	YES	Law - We do not require full legal name
Nevada	YES	Some in law-but not necessary in the same placement on the face as specified in AAMVA standard. Also use mailing address on card with residence on the driver record.
New Hampshire	YES/NO	Administrative Rule. Do not use the full legal name. Applicants can also opt out of putting the principle address on the document. The principle address is then captured in the system. Meet all the other requirements.
New Jersey	YES	Law and Administrative Rule; Put mailing address on the card. Do capture residents address and store in the system.
New Mexico	YES	
New York	YES	Procedure; Legal address and mailing address may be different.

SECTION D: The Act requires the development of standards for information to be included on each driver's license or personal identification card, including (i) the person's full legal name, (ii) the person's date of birth, (iii) the person's gender, (iv) the person's license or personal identification card number, (v) a digital photograph of the person (vi) the person's address of principal residence, (vii) the person's signature.

TABLE D-1	Have standards that require the data elements listed to be included on the DL/ID	Notes / Requirements are provided for by:
Jurisdiction		
North Carolina	YES	Law and Policy Have mailing address in the computer system. Face of license must have the physical address. There are no exceptions for photo.
North Dakota	YES	Law
Ohio	YES	Law, Procedure - Except for full legal name (not always possible). Gender required by procedure not law.
Oklahoma	YES	LAW Except for address – it is mailing address that is put on DL. Other information available in record
Oregon	NO	Oregon law requires the license or ID card number, cardholder name (not necessarily the full name, date of birth, and residence address to be on the card. It also requires a brief description of the person "for the purpose of identification," and we include gender as part of that along with height and weight. Oregon law also requires that, with some exceptions, the card have a photograph of the cardholder taken at the time of application, and it requires a signature by stating that a license is not valid until it is signed.
Pennsylvania	YES	Law Include the principle address on the document. Only have 35 characters in the name field, could be a problem for the full legal name.
Rhode Island		
South Carolina	YES	Law
South Dakota	YES	Law (have a hard time determining what is true legal residence.)
Tennessee	YES	Law
Texas	YES/NO	A variety of these (law, procedure, etc.)-Texas law allows applicants to claim Texas as a residence without residing here (i.e. Pres. Bush) Full legal name does not always fit on card or database.
Utah	YES	Law
Vermont	YES	Use the mailing address. The principle address is in the system and LE has access. CDLs have principle address. Have concerns with putting the principle address on the document for safety/security reasons for the customer. Law
Virginia	YES	Law-Law says name but not full legal name. Have legislation proposed for full legal name. The primary address is the mailing.
Washington	NO	Law Do not capture "legal" name. Use name on source document. Also don't capture principal residence address on ID cards-can use PO Box. Would change if required to in federal statute
West Virginia	YES	Law
Wisconsin	YES	However we allow the use of the middle initial. All of the above.
Wyoming	YES	Law, Procedure, Administrative Rule
District of Columbia	YES	All

Have standards that require data elements in the Act to be on the DL/ID

Summary: Most jurisdictions have standards that require the data elements listed in the Act to be on the DL/ID. Not all require the full legal name. Some jurisdictions place the mailing address on the face of the document rather than the physical address as they have concerns for safety/security of their constituents.



SECTION D: The Act requires the development of standards for information to be included on each driver's license or personal identification card, including (i) the person's full legal name, (ii) the person's date of birth, (iii) the person's gender, (iv) the person's license or personal identification card number, (v) a digital photograph of the person (vi) the person's address of principal residence, (vii) the person's signature.

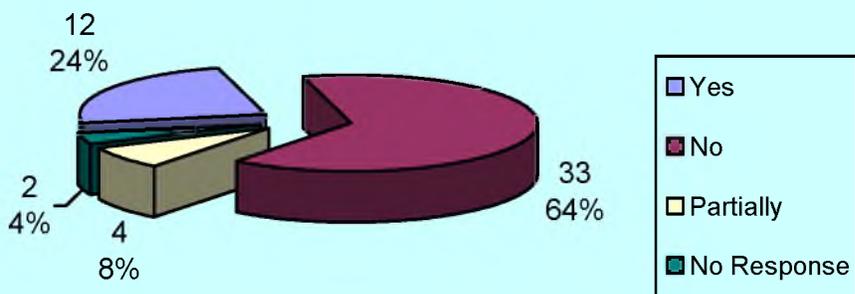
TABLE D-2	Standard follows the AAMVA Card Design Specifications	Notes
Jurisdiction		
Alabama	NO	
Alaska	YES	Using 2000 standards. Will adopt new ones.
Arizona	YES	2000 AAMVA specifications. Plan to move to the new specs upon redesign of card.
Arkansas	NO	
California	NO	Not currently, but will implement many of them in the new contract.
Colorado	YES/NO	Not entirely-Don't capture 125 characters, vertical format, common OVD and pink stripe
Connecticut	NO	Have been evaluating the card design specifications. Have issues with the salmon banner. Follow a lot of the specifications currently.
Delaware	NO	Follow most of the requirements but not all. Data and zones are the same. Do not have the 125 fields for the face of the document. Do not have the common OVD. Have a few of the covert features. Do not have the license classification fields.
Florida	YES	Mostly – may not follow the physical address
Georgia	NO	Plan to follow it to the extent that is possible.
Hawaii	YES	With Marquis Data Systems card being implemented. This takes effect (production) by the end of March.
Idaho	YES	Follow the AAMVA specs currently-just now renewing photo contract and asking for language to allow enhancements as well.
Illinois	NO	RFP process will look at incorporating new specifications in 07.
Indiana	NO	
Iowa	NO	Will follow the specification with the new system (be implementing in one year) which will update the documents as well.
Kansas	YES	For the most part. We have everything vendor offers including a digital water mark and an OVD
Kentucky	NO	We follow the 2000 version right now.
Louisiana	NO	We will negotiate a new contract prior to 2007 and address these issues.
Maine		
Maryland	YES	Card design spec and through CVP and independent lab for compliance.
Massachusetts	NO	Do not fully comply. The image is on right side of the document and do not use salmon banner. Also spell license correctly.
Michigan	NO	When the card contract is up 12/2008, we will include new specifications. The current contract would permit changes earlier if necessary (federal mandates).
Minnesota	NO	Part of the issue, is number of characters. When we were at conference in Houston, we said that the number of characters makes card printing too small. Law enforcement wants larger letters for easier reading at night. We don't agree to have under 21 be a vertical layout. Retailers do not want vertical layouts. Our card complies with most specifications. We have all security features. Our contract is up for renewal in 5 years, but could be extended five more years.
Mississippi	NO	We don't put the flag on it and we do not put the image in our 2D Bar Code.
Missouri	NO	Front of license: it has the information, but not in the required zone. The portrait size is a variable. We do not collect country. We do not spell out Date of Issue, but have it in a sequential number – Julian Date. It is not easy for another state to see date of issue. Back of license: We do not explain codes. Law enforcement has to look in driver record for this. We have no security (OVD) device on back. We cannot remove required information on back of license in order to make room for OVD without a statute change. We would need to re-bid our vendor contract (expires five years from June '05). We do not have vertical format for minors. We do put picture on opposite side though. We also may have a zone issue with 2D bar code on back.
Montana	NO	Intent to follow the new card design. July 2007 new contract.
Nebraska	NO	We just re-did DL contract in 12/2002 and met the specifications in place at that time.
Nevada	YES/NO	Not all. Again location of elements is not the same. Cannot capture 125 characters in name field. No pink.
New Hampshire	NO	Are evaluating elements.
New Jersey	NO	Not in complete compliance. Are moving towards compliance. Issuing an RFP for a central issuance system to have a hybrid system. Would be a good opportunity to move to the full standard.

SECTION D: The Act requires the development of standards for information to be included on each driver's license or personal identification card, including (i) the person's full legal name, (ii) the person's date of birth, (iii) the person's gender, (iv) the person's license or personal identification card number, (v) a digital photograph of the person (vi) the person's address of principal residence, (vii) the person's signature.

TABLE D-2	Standard follows the AAMVA Card Design Specifications	Notes
Jurisdiction		
New Mexico	YES	
New York	YES	The new NY document will follow even more closely.
North Carolina	YES/NO	Will be implementing the 2004 standards. Will only be a horizontal layout and will not do the salmon banner or the spelling of driver's license. Compliant with the 2000 ID Standard.
North Dakota	NO	Our current license does not have all of the features of the AAVMA card design specs. However, our RFP will require it. Out current contract is up June 30, 2006.
Ohio	YES	Not completely. OH does not have a 2D barcode on the license. Additional information will be provided.
Oklahoma	NO	Plan is to get a new card design spec that is more uniform for LE purposes across the nation. Current contract until 2010. Changes started with new contract.
Oregon	NO	The recent redesign of the Oregon DL/ID card was completed just before the AAMVA DL/ID Card Specification, published in 2003. The AAMVA DL/ID Standards - 2000 were used in the development of our current cards. We don't follow the card design specs such as, placement of the data in specified zones, horizontal vs. vertical layout for those under age of 21, and the data elements in the document discriminator field, audit number or inventory control number.
Pennsylvania	NO	Do not fully comply with all of the requirements. Are working towards meeting them. Are working towards the specs. New license will meet standard. Should be 2006.
Rhode Island		
South Carolina	NO	Follow the 2000 standard.
South Dakota	YES	Not the most recent AAMVA draft iteration. We use the previous version. We plan to implement the newest version via RFP or enhancements to system in 2008.
Tennessee	NO	Use the 2000 DL/ID Standard. Current contract will expire in 2 years and the Card Design Specifications will be taken into consideration when writing the RFP.
Texas	YES/NO	Not completely-See previous question.
Utah	NO	In negotiation with vendor to implement
Vermont	NO	Are using the older card design specifications. Will eventually work towards the new standard during the next RFP and new contract.
Virginia	NO	Will be moving to the new standards. Currently follow the 2000 DL/ID Standards.
Washington	NO	Not compliant with data placement or pink color requirement
West Virginia	NO	Just ordered a new contract and will implement around August.
Wisconsin	NO	Capture middle initial in some instances rather than full middle name
Wyoming	YES	WY has a new document that will be out in March 2005.
District of Columbia	NO	Do not use the salmon banner. Do not meet the specification requirements. Will have a system enhancement in September that will enhance DC standards.

Have standards that follow the AAMVA Card Design Specifications

Summary: Most jurisdictions do not currently follow the AAMVA Card Design Specifications. Many jurisdictions are preparing RFPs for their new DL/ID contracts and will be migrating to the Card Design Specifications in whole or part.



SECTION D: The Act requires the development of standards for information to be included on each driver's license or personal identification card, including (i) the person's full legal name, (ii) the person's date of birth, (iii) the person's gender, (iv) the person's license or personal identification card number, (v) a digital photograph of the person (vi) the person's address of principal residence, (vii) the person's signature.

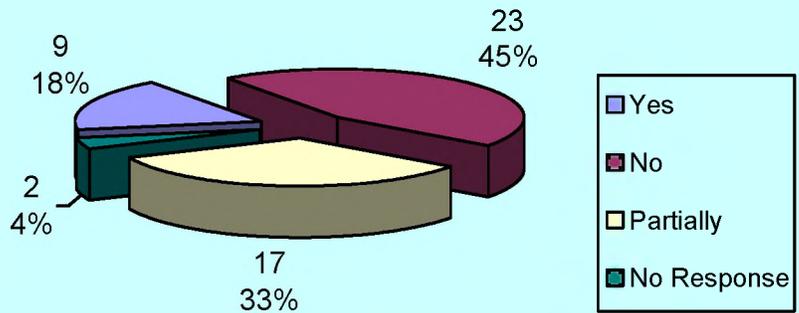
TABLE D-3	Card Design Standards meet or exceed the requirements developed by the AAMVA Security Framework	Notes
Jurisdiction		
Alabama	YES	They exceed the AAMVA standards.
Alaska	NO	
Arizona	YES/NO	For the most part
Arkansas	NO	
California	NO	Not until the new contract is implemented.
Colorado	YES/NO	Not quite
Connecticut	YES/NO	No because of the card design specifications.
Delaware	YES/NO	There is only so much real estate on the document.
Florida	YES	
Georgia	YES/NO	Yes for the information on the documents, no for the card design specifications.
Hawaii	YES	
Idaho	YES/NO	See previous question.
Illinois	YES/NO	See original survey response.
Indiana	NO	
Iowa	NO	Iowa is working to meet the standard.
Kansas	YES	For the most part
Kentucky	NO	
Louisiana	NO	
Maine		
Maryland	YES	
Massachusetts	YES/NO	
Michigan	NO	
Minnesota	NO	We do a lot of what is required.
Mississippi	NO	We do most of it, but not all of it.
Missouri	NO	
Montana	NO	
Nebraska	NO	Our name field is 35 characters. Verification processes are not in place.
Nevada	YES/NO	Close
New Hampshire	NO	
New Jersey	YES/NO	
New Mexico	YES/NO	Current yes; proposed no; NM will, to the best of its capabilities, adhere to the new standards.
New York	YES	
North Carolina	YES/NO	Not quite all of the Card Design Specifications.
North Dakota	NO	
Ohio	YES	Overall yes.
Oklahoma	NO	Does not meet the requirements in the detail provided.
Oregon	NO	We allow a person to provide the name they use, not necessarily the full given name at time of birth, for example Robert could use Bob. Our card design does not follow the card design specs such as, placement of the data in specified zones, horizontal vs. vertical layout for those under age of 21, and the data elements in the document discriminator field, audit number or inventory control number.
Pennsylvania	YES/NO	
Rhode Island		
South Carolina	YES/NO	
South Dakota	NO	We are using old AAMVA card standards.
Tennessee	YES/NO	Currently following the 2000 DL/ID Standard.
Texas	NO	See previous question.
Utah	YES	When negotiations are done.
Vermont	NO	Are using the older card design specs and use mailing address.

SECTION D: The Act requires the development of standards for information to be included on each driver’s license or personal identification card, including (i) the person’s full legal name, (ii) the person’s date of birth, (iii) the person’s gender, (iv) the person’s license or personal identification card number, (v) a digital photograph of the person (vi) the person’s address of principal residence, (vii) the person’s signature.

TABLE D-3	Card Design Standards meet or exceed the requirements developed by the AAMVA Security Framework	Notes
Jurisdiction		
Virginia	YES/NO	Do not meet the current Framework standard for card design.
Washington	NO	See previous question
West Virginia	YES/NO	New card and system will bring WV into compliance with the Framework.
Wisconsin	NO	No OVD
Wyoming	YES	
District of Columbia	NO	D.C. will be making improvements.

Card Design Specifications meet or exceed standards developed by the DL/ID Security Framework and the DLA

Summary: A majority of jurisdictions do not meet or exceed the requirements developed by the *AAMVA Security Framework*; however, jurisdictions continue to make improvements.



SECTION D: The Act requires the development of standards for information to be included on each driver's license or personal identification card, including (i) the person's full legal name, (ii) the person's date of birth, (iii) the person's gender, (iv) the person's license or personal identification card number, (v) a digital photograph of the person (vi) the person's address of principal residence, (vii) the person's signature.

TABLE D-4	The minimum standard for Card Design Specification for driver's licenses and personal identification cards should be:
Jurisdiction	
Alabama	The framework is fine to work from. There are ways to meet every requirement there.
Alaska	Happy with framework
Arizona	Should include biometric identifier
Arkansas	AAMVA Standards
California	For the most part, the Framework and the DLA are good.
Colorado	Need leeway on number of characters and pink stripe.
Connecticut	No problems with the data elements that are required by the Act. Full legal name will be an issue for CT.
Delaware	The key elements.
Florida	Current standards are good. Support the Framework
Georgia	Agree with AAMVA recommendations.
Hawaii	We support the framework and AAMVA card design specifications.
Idaho	Framework and DLA are sufficient
Illinois	AAMVA card design specs to the degree possible. We don't know if we can implement all specifications.
Indiana	AAMVA card design specifications
Iowa	The AAMVA DL/ID Security Framework
Kansas	-
Kentucky	We support the DLA and framework
Louisiana	AAMVA Standards. Someone needs to make a decision on resident address for the front of CDLs.
Maine	
Maryland	Minimum as set under DLA. Also AAMVA card design specs.
Massachusetts	Similar to what MA has now. All personal and identifying information should be on the document. Name, DOB, residential address, expiration date and have verification options.
Michigan	We agree with most of what is included on the AAMVA standard. We don't believe country of origin is important. Hair color and weight are changeable and therefore not necessary.
Minnesota	We support the Act and the Framework. We think what we have in MN should be the standard however.
Mississippi	We agree with the Act.
Missouri	We support the Framework. It would be difficult for us to do.
Montana	Recommendations DLA agreement
Nebraska	We support the Framework except the 125 character name field. How do you do that on a minor vertical layout card?
Nevada	Framework
New Hampshire	Agree with the Act on the elements.
New Jersey	Agree with the list with the exception of the physical address on the document. Should be stored within the system. There are the address confidentiality requirements for certain types of people.
New Mexico	Facial recognition (verifiable by a reader); Biometrics;
New York	Should contain the name DOB, gender, client ID, address, digitized image, signature, license class or type of document. If a biometric is developed it should be contained on the document.
North Carolina	Weight, eye color and hair color should not be a part of the minimum requirements. These seem to be out-dated.
North Dakota	AAMVA standards.
Ohio	What is required above (7 items)
Oklahoma	DLA standard.
Oregon	Cardholder's name, residence address, gender, license number, signature; class of license, endorsements, restrictions, expiration date, and jurisdiction
Pennsylvania	For the most part PA agrees with the card designs specification with the exception of the banner.
Rhode Island	
South Carolina	There should be citizen status on the document as well. Would be able to accept the document on face value when they come from another state and would not have to require additional documents.
South Dakota	An indicator showing person not a legal resident Full legal name. Date of Birth. Residential address. DL/ID number. Gender. Photo. Signature. Issue/Exp. Date. Class. Endorsements. Restrictions. Physical description: ht. wt. eye color, name of state.

SECTION D: The Act requires the development of standards for information to be included on each driver's license or personal identification card, including (i) the person's full legal name, (ii) the person's date of birth, (iii) the person's gender, (iv) the person's license or personal identification card number, (v) a digital photograph of the person (vi) the person's address of principal residence, (vii) the person's signature.

TABLE D-4 Jurisdiction	The minimum standard for Card Design Specification for driver's licenses and personal identification cards should be:
Tennessee	The DLA and the DL/ID Security Framework offers a good outline for the development of the new minimum standards.
Texas	DLA/Framework
Utah	AAMVA's Framework
Vermont	To utilize the mailing address instead of principle address for safety/security reasons.
Virginia	The minimum information on the driver's license and personal identification card should include the fields listed in the ACT: full legal name, date of birth, gender, license or personal identification card number, digital photograph, address of principal residence, and signature.
Washington	DLA and Framework requirements are sufficient.
West Virginia	Name, photo, physical address, license class and endorsement spelled out on the back of the license. Uniformity of license will be helpful. Support the Framework.
Wisconsin	We support the AAMVA standard. Full legal name causes us some problems in getting there. Having the first and middle name together instead of separate entities is a system issue. We have 4M licensees. Trying to get all of them in the system is a big task.
Wyoming	The AAMVA Framework
District of Columbia	AAMVA Framework and DLA

Summary: Most jurisdictions support the *AAMVA Security Framework* and DLA. Jurisdictions have some issues with the *AAMVA Card Design Specifications*. Need to look at biometrics. Could be an indicator for legal presence status. See additional notes above.

SECTION D: The Act requires the development of standards for information to be included on each driver's license or personal identification card, including (i) the person's full legal name, (ii) the person's date of birth, (iii) the person's gender, (iv) the person's license or personal identification card number, (v) a digital photograph of the person (vi) the person's address of principal residence, (vii) the person's signature.

TABLE D-5	Comments to assist in the development of minimum standards for information to be included on the DL/ID
Jurisdiction	
Alabama	-
Alaska	Would like to see biometric but not until there is a federally mandated common standard.
Arizona	Minimum standard should include real time processes
Arkansas	Use the DLA.
California	Methods need to be developed that accurately assess card security features for real world use and effectiveness.
Colorado	-
Connecticut	Only so much real estate on the card for all of the data elements. Need to have a reason (for privacy concerns) for each of the data elements that are collected.
Delaware	Place of birth does not need to be on it as well as the U.S.A flag. The place of birth could be stored in the system. People are sometimes born overseas and this could be confusing. With a mobile society it does not make sense to track place of birth on the document. When you look at the states currently, we are listing what we already need.
Florida	Refer to the Framework.
Georgia	AAMVA should consider that there should be a public and private key encrypted section. Are going to do a two tier bar code.
Hawaii	-
Idaho	-
Illinois	-
Indiana	-
Iowa	Utilization of the AAMVA DL/ID Security Framework. Think that most jurisdictions would be better served if AAMVA had better reference/examples to the intended layout/design of the documents.
Kansas	-
Kentucky	We feel strongly that ID cards can only be issued by the driver's home state.
Louisiana	-
Maine	
Maryland	See D3.
Massachusetts	If new standards are established, there needs to be a significant amount of time to allow for contract cycles. All states should not have to have the same look of the license. Should not have to look the same way and do not agree with the zones on the document as in the requirement.
Michigan	See previous question
Minnesota	-
Mississippi	We would like for some way to have help to implement these new standards. When all driver licenses look exactly alike, we have more (not less) opportunity for fraud. Fraud becomes easier because fewer elements need to be changed to build a template to make licenses for any state. We oppose every card looking alike. Let states choose the color of the card for example. It's okay to require all information to be same, but let states design their own cards.
Missouri	If this does become a federal mandate, we would like grant money even if we do not belong to DLA. Tying eligibility for grant money to becoming members of DLA creates a 'catch - 22' for states.
Montana	Follow DLA standards
Nebraska	We support what is in the Framework.
Nevada	-
New Hampshire	Costs and time to implement new minimum standards. Need support for the reasons why DOT is setting these standards to take to the state legislature.
New Jersey	DOT should revisit physical address on the document but require it to be stored in the system.
New Mexico	-
New York	Should contain the name DOB, gender, client ID, address, digitized image, signature, license class or type of document. If a biometric is developed it should be contained on the document.
North Carolina	Need funding to support minimum requirements.
North Dakota	-
Ohio	-
Oklahoma	Finalization and implementation of DLA.

SECTION D: The Act requires the development of standards for information to be included on each driver's license or personal identification card, including (i) the person's full legal name, (ii) the person's date of birth, (iii) the person's gender, (iv) the person's license or personal identification card number, (v) a digital photograph of the person (vi) the person's address of principal residence, (vii) the person's signature.

TABLE D-5	Comments to assist in the development of minimum standards for information to be included on the DL/ID
Jurisdiction	
Oregon	We urge that the standards not be too prescriptive.
Pennsylvania	DOT needs to consider that full legal name could take up too much real estate on the document. The AAMVA standards include hair color and weight; these should not be required elements as they are variable. State involvement is going to be critical as we develop these national standards.
Rhode Island	
South Carolina	DOT needs to consider the costs and time associated with implementation.
South Dakota	We support the Framework other than name collection procedures (125 character issue)
Tennessee	-
Texas	AAMVA is way behind on cost specs for the common OVD. Also refuses to indicate what it will contain. Texas administration says if they don't know, they won't add it. Also would like to know if the common OVD will serve as the level 3 forensic feature or if that will be an additional requirement. Texas has concerns that AAMVA has discussed keeping some profit from the sale of the OVD, though minimal.
Utah	-
Vermont	DOT should revisit the requirement for principle address on the document for safety/security reasons for the customer. VT is under a current contract and would need to be given an extension waiver. VT is not a totally mandatory photo state. Photos are required for all new applicants. 20% of their files are non-photo customers and will continue to be under the law. Law went into effect July 1, 2004.
Virginia	-
Washington	No pink; 125 Character is too long for face of document-WA can store 125 characters on database, however.
West Virginia	-
Wisconsin	Problems for us: middle initial and tracking names history from source documents.
Wyoming	Funding is an issue. All states need to be doing the same and be in compliance within a reasonable time.
District of Columbia	-

Summary: Generally, jurisdictions support the DLA and the *AAMVA Security Framework*. Appropriate funding needs to be provided to meet minimum requirements. Time-frames to implement minimum requirements need to be considered. Jurisdictions have contract cycles that need to be accounted for. See additional notes above.

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Section E

The Act requires the development of standards for common machine readable identity information to be included on each driver's license or personal identification card, including defined minimum data elements.

SECTION E: The Act requires the development of standards for common machine readable identity information to be included on each driver's license or personal identification card, including defined minimum data elements.

TABLE E-1	Have standards that require common machine-readable identity information to be included on the DL or ID, including defined minimum data elements	Provided for by: Law, Procedure, Administrative Rule, Other	Machine-readable Technologies	Notes
Jurisdiction				
Alabama	YES	Procedure	2D bar code and magstripe	
Alaska	YES	Procedure	2D bar code	
Arizona	YES	Law and Procedure	Bar code and magstripe	
Arkansas	YES	Procedure	2D bar code (PDF417) and magstripe	
California	YES	Administrative Rule	Magstripe	Format in ISO standards of 1993
Colorado	YES	Law	2D bar code and magstripe	
Connecticut	YES	Administrative Rule and Procedures	2D bar code	All information except photo and signature
Delaware	YES	Combination of all	2D-PDF417	
Florida	YES	Combination of all	2D, magstripe, 1D	The new license with the new digital image will have digital watermarking.
Georgia	YES	Administrative Rule	2D (PDF417)	Encrypted with a private key.
Hawaii	YES	Other: Contract	2D bar code (PDF417) 1D Linear bar code	Linear bar code contains DL #. Follow AAMVA standards.
Idaho	YES	Procedure	2D bar code (PDF417)	Contains descriptive and demographic information on front of card.
Illinois	YES	Policy	2D bar code (PDF 417), 1D bar code (code 39)	
Indiana	YES	Policy	1D bar code	Contains DL# only
Iowa	YES	Policy	Linear bar code, 2D bar code and magstripe	In future IA will have a 2D bar code and a magstripe standard.
Kansas	YES	Administrative Rule	Magstripe, 1D & 2D bar codes	
Kentucky	YES	LAW	2D bar code (PDF417) and 1D bar code	2D includes the image. 1D bar code with DL# and DOB.
Louisiana	YES	Law	Magstripe and 2D bar code	
Maine				
Maryland	NO		PDF417 (2D bar code)	Demographic data no encoding. Neither photo nor signature on 2D. Follow AAMVA standard
Massachusetts	YES	Administrative Policy	2D bar code	
Michigan	YES	LAW	Magstripe & 1D bar code	License number, DOB, Exp. Date
Minnesota	YES	Procedure	1D and 2D bar codes and magstripe	Follow AAMVA standards
Mississippi	YES	Procedures	Magstripe and 2D bar code	Follow AAMVA standard
Missouri	YES	Rule	2D bar code (PDF 417 format)	We have zone issues. We do not capture country in 2D bar code.
Montana	YES	Other through RFP for card	2D bar code	
Nebraska	YES	Law, Procedure	PDF 417 2D bar code	Broad authority in law, specific in Procedure

SECTION E: The Act requires the development of standards for common machine readable identity information to be included on each driver's license or personal identification card, including defined minimum data elements.

TABLE E-1	Have standards that require common machine-readable identity information to be included on the DL or ID, including defined minimum data elements	Provided for by: Law, Procedure, Administrative Rule, Other	Machine-readable Technologies	Notes
Jurisdiction				
Nevada	YES	Contractually with vendor	PDF417 2D bar code	
New Hampshire	YES	Procedure and Law	Magstripe and 2D bar code	
New Jersey	YES	Law-is discretionary	2D and 1D	
New Mexico	YES	Law	Magstripe	
New York	YES	Procedure	1D and 2D bar codes	
North Carolina	YES	Policy	2D bar code	Are required to encrypt 1996 to current documents. To read you must have the encryption code. With the new license, NC will just use the PDF417 non-encrypted.
North Dakota	YES	Other Administrative policy	2D bar code PDF417	
Ohio	YES	PROCEDURE	1D bar code, magstripe 3tracks	
Oklahoma	YES	Procedure	2D and 1D bar codes	
Oregon	YES	Other	1-D and 2-D bar code	Oregon's policy is to follow current AAMVA standards as closely as possible. As mentioned earlier, we used the AAMVA DL/ID Standards - 2000 in the development of our current card.
Pennsylvania	YES	Procedure	1D, 2D bar codes and magstripe	
Rhode Island				
South Carolina	YES	Policy	2D bar code and magstripe	Based on the AAMVA 2000 DL/ID Standard
South Dakota	YES	Procedure and Law	2D bar code	Follow AAMVA standard
Tennessee	YES	Procedure	2D and 1D bar codes	
Texas	YES	Procedure	magstripe and 1D bar code	
Utah	YES	Contractual with Vendor	1D and 2D bar codes	
Vermont	YES	Law	2D and magstripe	Magstripe does not meet the AAMVA standard. Law states name, DOB, height and weight. All elements are in the 2D bar code. (will send a copy)
Virginia	YES	Policy	1D and 2D bar codes	
Washington	YES	Procedure	1D and 2D bar codes	
West Virginia	YES	Law	2D bar code	
Wisconsin	YES	Procedure	2D bar code	
Wyoming	YES	Procedure	2D bar code	Procedure and using the AAMVA standard for justification.
District of Columbia	YES	Policy	2D and 1D bar code	Follow the AAMVA Standard

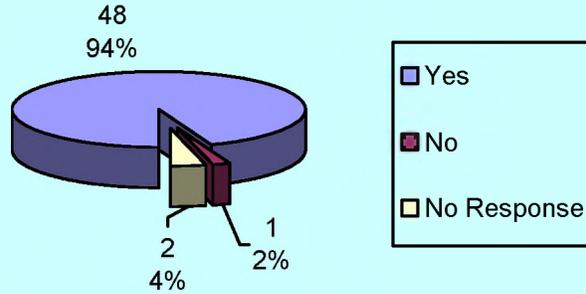
SECTION E: The Act requires the development of standards for common machine readable identity information to be included on each driver's license or personal identification card, including defined minimum data elements.

TABLE E-1	Have standards that require common machine-readable identity information to be included on the DL or ID, including defined minimum data elements	Provided for by: Law, Procedure, Administrative Rule, Other	Machine-readable Technologies	Notes
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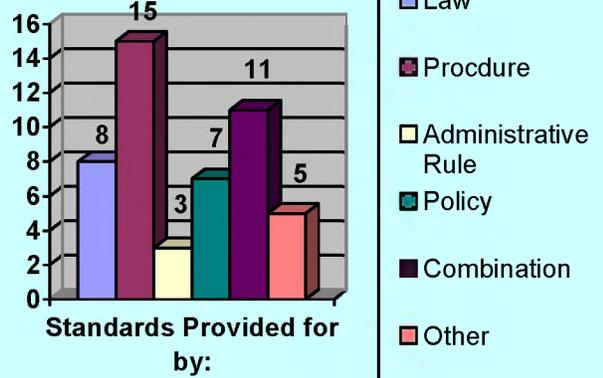
Summary:

- Most jurisdictions have standards that require common machine-readable identity information to be included on the DL or ID, including defined minimum data elements.

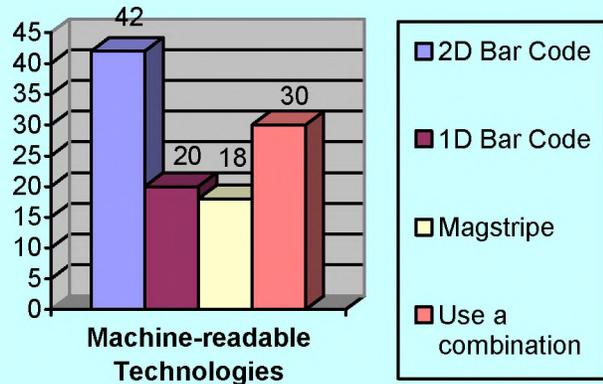
Have standards for machine-readable technologies



- Standards are provided for by a combination of law, administrative rule, policy, procedure and other.



- 2D and 1D bar codes are the most common MRT, followed by the magstripe. Thirty jurisdictions use a combination of machine-readable technologies.



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SECTION E: The Act requires the development of standards for common machine readable identity information to be included on each driver's license or personal identification card, including defined minimum data elements.

TABLE E-2	Have a standard for what information is contained in the machine-readable portion of the documents	Provided for by: Law, Procedure, Administrative Rule, Other	Limit the use of information collected and used from the machine-readable portion(s) of the document	Provided for by: Law, Procedure, Administrative Rule, Other
Jurisdiction				
Alabama	YES	Procedure	NO	
Alaska	YES	Procedure	NO	Not at this time. Need legislation.
Arizona	YES	Law	NO	
Arkansas	YES	Procedure	NO	
California	YES	Administrative Rule	YES	Law
Colorado	YES	Law	NO	
Connecticut	YES	Administrative rule and Procedure	NO	N/A
Delaware	YES	Procedure	NO	N/A
Florida	YES	Procedure	NO	
Georgia	YES	Administrative Rule	YES	Administrative Rule
Hawaii	YES	Other: Contract	YES	Law
Idaho	YES	Procedure	NO	
Illinois	YES	Policy	YES	Policy
Indiana	NO		YES	Law
Iowa	YES	Policy	NO	-
Kansas	YES	Procedure	NO	
Kentucky	YES	Procedure under broad authority	NO	
Louisiana	YES	Procedures	NO	
Maine				
Maryland	YES	Other: Practice	NO	
Massachusetts	YES	Administrative Policy	NO	
Michigan	YES	Law	NO	
Minnesota	YES	Procedure. Law limits some things that can be included: but lets Commissioner determine for the most part, what should be included.	NO	
Mississippi	YES	Procedure- Going to e-citation so it will be in law too.	YES	Policy DPPA
Missouri	YES	Rule	NO	
Montana	YES	Other through RFP for card	NO	
Nebraska	YES	Law	YES	Law
Nevada	YES	Contract	NO	
New Hampshire	YES	Law and Procedure	YES	Law
New Jersey	YES	Law	YES	Law
New Mexico	YES	Law	YES	Law
New York	YES	Procedure	YES	Procedure
North Carolina	YES	-	YES	Law
North Dakota	YES	Other. Card format is by law. Data elements in 2D Bar code by administrative decision.	NO	
Ohio	YES	Procedure	NO	
Oklahoma	YES	Law and Procedure	NO	

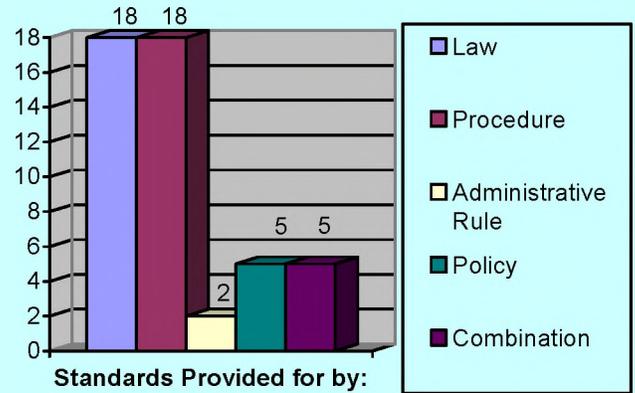
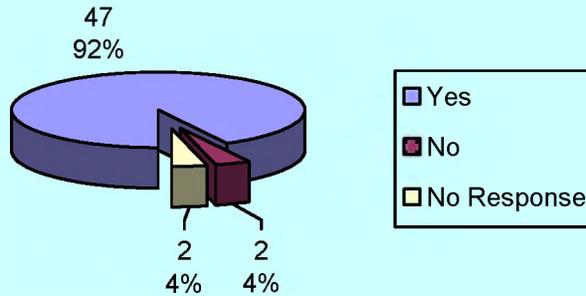
SECTION E: The Act requires the development of standards for common machine readable identity information to be included on each driver's license or personal identification card, including defined minimum data elements.

TABLE E-2	Have a standard for what information is contained in the machine-readable portion of the documents	Provided for by: Law, Procedure, Administrative Rule, Other	Limit the use of information collected and used from the machine-readable portion(s) of the document	Provided for by: Law, Procedure, Administrative Rule, Other
Jurisdiction				
Oregon	YES	Other	NO	
Pennsylvania	YES	Procedure	NO	
Rhode Island				
South Carolina	YES	Policy	NO	N/A
South Dakota	YES	Procedures	NO	
Tennessee	YES	Procedures	YES	Law
Texas	YES	Law	YES	Law
Utah	YES	Contract	NO	-
Vermont	YES	Law	NO	N/A
Virginia	YES	Policy	NO	
Washington	YES	Procedure	NO	
West Virginia	NO	N/A	YES	Law
Wisconsin	YES	Procedure	NO	N/A
Wyoming	YES	Procedure	NO	N/A
District of Columbia	YES	Policy	NO	

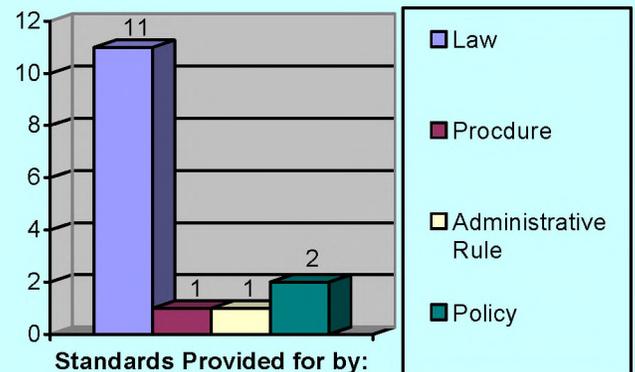
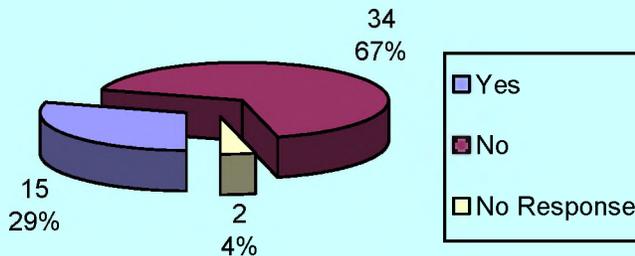
Summary:

1. Most jurisdictions have a standard for what information is contained in the machine readable portion of the documents
2. Standards are provided for by a combination of law, administrative rule, policy, procedure and other.
3. Most jurisdictions do not limit the collection and use from the machine readable portions of the document.
4. For those jurisdictions that do limit the collection and use from the machine readable portions of the document, it is generally provided for by law and policy.

Have standards for what information is contained on the machine-readable technology



Limit the use of information collected from machine-readable technology



SECTION E: The Act requires the development of standards for common machine readable identity information to be included on each driver's license or personal identification card, including defined minimum data elements.

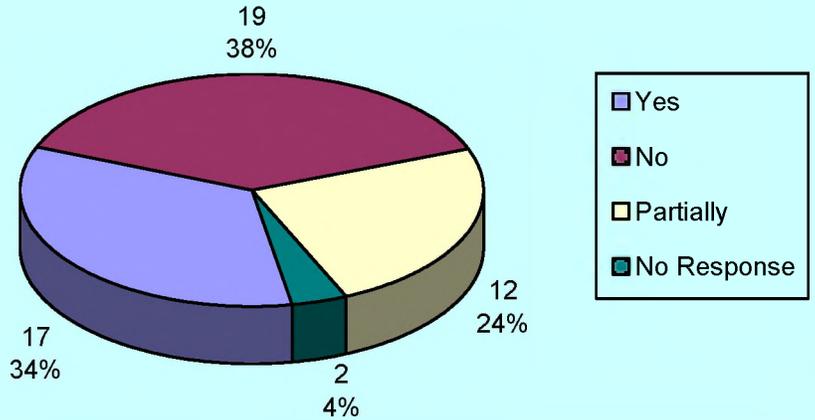
TABLE E-3	Meet or exceed the requirements developed by the DLA and AAMVA Security Framework	Notes
Jurisdiction		
Alabama	NO	We don't limit MRT capture, compiling or storage. How can you do that? Anyone can buy the technology.
Alaska	NO	
Arizona	YES	But don't limit the use of MRT
Arkansas	NO	
California	YES/NO	12 will comply when new contract is implemented. #7 - yes
Colorado	YES/NO	Not entirely
Connecticut	YES/NO	Do not limit the use and collection of data from the MRT.
Delaware	YES/NO	Do not limit the use of MRT.
Florida	YES/NO	For the most part. Do not limit the use of information collected from the machine readable portions.
Georgia	NO	The framework requires the data to be public key.
Hawaii	YES	
Idaho	YES	Except we do not limit use
Illinois	YES	We believe the 2 D bar code does.
Indiana	NO	
Iowa	YES	Iowa is nearly compliant.
Kansas	YES	Mostly
Kentucky	NO	
Louisiana	NO	
Maine		
Maryland	YES	
Massachusetts	YES/NO	
Michigan	NO	
Minnesota	NO	
Mississippi	NO	We do most of it. There is controversy about our state flag. We would hate to have it be a requirement on a driver license.
Missouri	NO	
Montana	NO	
Nebraska	NO	We meet previous AAMVA card spec.
Nevada	YES	Mostly
New Hampshire	YES	
New Jersey	YES	
New Mexico	YES	
New York	YES	Exceed the standards
North Carolina	YES	
North Dakota	NO	We don't limit the information on the machine readable technology.
Ohio	YES	Yes, AAMVA DL/ID 2000
Oklahoma	NO	
Oregon	NO	
Pennsylvania	YES/NO	Magstripe is not in the current AAMVA format. Hope to bring the Magstripe into conformance.
Rhode Island		
South Carolina	YES/NO	There are statues that indicated elements that cannot be captured at all and put into the MRT.
South Dakota	NO	We don't have current AAMVA card design specifications or limits on machine readable technology.
Tennessee	YES	
Texas	YES/NO	Not the common OVD or pink-will meet these standards in next contract.
Utah	N/A	Will be with new card contract
Vermont	NO	But working on it.
Virginia	YES/NO	

SECTION E: The Act requires the development of standards for common machine readable identity information to be included on each driver's license or personal identification card, including defined minimum data elements.

TABLE E-3	Meet or exceed the requirements developed by the DLA and AAMVA Security Framework	Notes
Jurisdiction		
Washington	YES	Except limiting use
West Virginia	YES/NO	Just a 2D bar code currently. Working to meet the standards.
Wisconsin	NO	
Wyoming	YES	But, do not limit the use of information on the MRT.
District of Columbia	YES/NO	

Meet or exceeds the requirements developed by the AAMVA Security Framework and the DLA

Summary: Most jurisdictions partially meet, meet or exceed the requirements developed by the DLA and *AAMVA Security Framework*, for card design specifications and limiting the use of MRT.



SECTION E: The Act requires the development of standards for common machine readable identity information to be included on each driver's license or personal identification card, including defined minimum data elements.

TABLE E-4 Jurisdiction	The minimum standard for machine readable identity information to be included for driver's licenses and personal identification cards should be:
Alabama	Demographic data on the front of licenses should be captured by machine readable technology.
Alaska	Framework if jurisdictions legislate use
Arizona	AAMVA Standard
Arkansas	DLA Standard
California	The standard must include technologies that can be read with available devices and are not read with the use of proprietary software.
Colorado	Framework Specs.
Connecticut	The AAMVA Framework
Delaware	Need to have a limit on the use of the MRT in a national standard. Should be required under the DPPA. DOB should be the only thing usable for tracking alcohol and tobacco.
Florida	The AAMVA Framework – FL has added a 1D bar code for the embedded inventory of that card itself.
Georgia	There should be a two tier approach for information open to public and information encrypted for DMV and LE use.
Hawaii	We support the DLA and Security Framework
Idaho	Framework is sufficient-allows appropriate amount of flexibility.
Illinois	AAMVA specification as long as it allows states to encrypt.
Indiana	AAMVA card design specifications
Iowa	The AAMVA DL/ID Security Framework
Kansas	DLA
Kentucky	We support the DLA and Framework. We wish they would look at putting the image back in the bar code.
Louisiana	We agree with the Framework
Maine	
Maryland	AAMVA Security Framework
Massachusetts	What ever is in the MRT should confirm what is on the face of the document.
Michigan	If you can see it, it should be encoded. If so, there needs to be limits on who can collect and use the information.
Minnesota	We support the Framework
Mississippi	It depends on who the user is. Convenience stores ought to access certain restricted information but law enforcement ought to be able to access everything. TSA also needs to see everything.
Missouri	We support the Framework, ideally.
Montana	Standard convenient for LE. Address (physical – principle residence) needs to be embedded in MRT.
Nebraska	It should be limited to information on the face of the license, plus biometrics. It should include signature and digital image.
Nevada	-
New Hampshire	The AAMVA Security Framework is acceptable.
New Jersey	The AAMVA Standard
New Mexico	Magstripe and 2D bar code; readable by public/private entities as needed.
New York	Should include all of the information that is contained on the document including the digitized signature and the biometric.
North Carolina	The AAMVA Framework
North Dakota	AAMVA Standard
Ohio	AAMVA standard data elements.
Oklahoma	DLA standard.
Oregon	The barcode should contain no information about the cardholder that is not printed in human-readable form on the card. We understand the need for items such as field names and data element separators within the barcode and have no problem with those.
Pennsylvania	The AAMVA standard
Rhode Island	
South Carolina	The AAMVA standard
South Dakota	All information on the face of the card except photo.
Tennessee	What TN is currently doing. Agree with the DLA and the DL/ID Security Framework (provides a good starting point)
Texas	Limit to Human Readable Data
Utah	AAMVA's Framework

SECTION E: The Act requires the development of standards for common machine readable identity information to be included on each driver's license or personal identification card, including defined minimum data elements.

TABLE E-4 Jurisdiction	The minimum standard for machine readable identity information to be included for driver's licenses and personal identification cards should be:
Vermont	Everything stated but should not require principle address. Support the MRT limits. Have some issues with the card deign specifications.
Virginia	At a minimum, the machine-readable technologies should contain the information found on the face of the driver's license or personal identification card.
Washington	DLA/Framework is sufficient
West Virginia	To capture what is on the front of the card. Photo should be in the MRT for LE, alcohol and tobacco sales. Support framework.
Wisconsin	PDF 417 format and AAMVA best practices standards document
Wyoming	Use the AAMVA Framework
District of Columbia	AAMVA Framework and DLA.

Summary: Generally, jurisdictions feel that the minimum standard developed should require the information contained on the front of the document to be stored in the MRT. Jurisdictions generally support the requirements in the DLA and *AAMVA Security Framework*. A number of jurisdictions feel that a biometric should be included and that parts of the MRT should be encrypted or that the document should include an additional MRT that is encrypted.

SECTION E: The Act requires the development of standards for common machine readable identity information to be included on each driver's license or personal identification card, including defined minimum data elements.

TABLE E-5	Comments to assist in the development of minimum standards for information to be included on machine readable technologies
Jurisdiction	
Alabama	-
Alaska	Not at this time
Arizona	AAMVA Standard
Arkansas	-
California	The standard must include technologies that can be read with available devices and are not read with the use of proprietary software.
Colorado	-
Connecticut	-
Delaware	Need to look at some way to limit the use of the MRT.
Florida	DOT needs to help the states to absorb the costs of digital watermarking. Additional monies need to be put into research on capturing and storing different types of information. The technologies that are out there can be very costly. When systems are down you need to have means to be able to authenticate the documents. No one does 8 ½ x 11 documents for being able to scan these documents. The larger documents can provide additional security features. Only small travel documents can be captured on this type of equipment. Vendors will not invest into the 8 ½ x 11 capturing capabilities.
Georgia	The AAMVA standard addresses the elements that should be there. Private key areas need to be considered.
Hawaii	-
Idaho	-
Illinois	-
Indiana	-
Iowa	Utilization of the AAMVA DL/ID Security Framework
Kansas	-
Kentucky	We're not too excited about the AAMVA 2003 card design specifications as it seems too much like a national ID card.
Louisiana	-
Maine	-
Maryland	-
Massachusetts	There should be guidelines that all states would use the same standard to allow each state to read the document in a license transfer.
Michigan	See previous question.
Minnesota	We support the Framework
Mississippi	-
Missouri	-
Montana	Guiding principles are DLA and security framework.
Nebraska	Standardize the biometric identifier all states use.
Nevada	-
New Hampshire	Magstripe is an antiquated technology that needs to be replaced by the 1D or 2D bar code.
New Jersey	Try not to shoot too high off the bat. Should be an obtainable standard.
New Mexico	-
New York	Should include all of the information that is contained on the document including the digitized signature and the biometric.
North Carolina	-
North Dakota	-
Ohio	-
Oklahoma	DLA implementation.
Oregon	-
Pennsylvania	Need to be given enough time to retool systems and technologies. Funding needs to be considered as well. Time and money.
Rhode Island	-
South Carolina	-
South Dakota	The Framework is sufficient.
Tennessee	-
Texas	-
Utah	-

SECTION E: The Act requires the development of standards for common machine readable identity information to be included on each driver's license or personal identification card, including defined minimum data elements.

TABLE E-5	Comments to assist in the development of minimum standards for information to be included on machine readable technologies
Jurisdiction	
Vermont	-
Virginia	-
Washington	-
West Virginia	Need to be able to read what is on the front in the MRT. WV has vertical license for under 21 and 18-21 in the color blue can buy tobacco but not alcohol. 15-18 is red to indicate not to sell alcohol or tobacco.
Wisconsin	Don't do anything expensive
Wyoming	Need to have funding
District of Columbia	-

Summary: Generally, jurisdictions feel that the minimum standard developed should require the information contained on the front of the document to be stored in the MRT. Jurisdictions generally support the requirements in the DLA and *AAMVA Security Framework*. A number of jurisdictions feel that a biometric should be included and the parts of the MRT should be encrypted or that the document should include an additional MRT that is encrypted.

When developing the minimum requirements, DOT needs to consider the costs associated with machine-readable technologies and be prepared to assist the jurisdictions in absorbing the costs.

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Section F

The Act requires the development of security standards to ensure that driver's license or personal identification cards are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

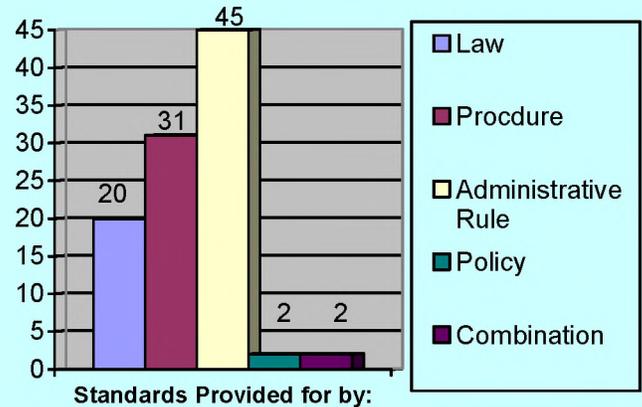
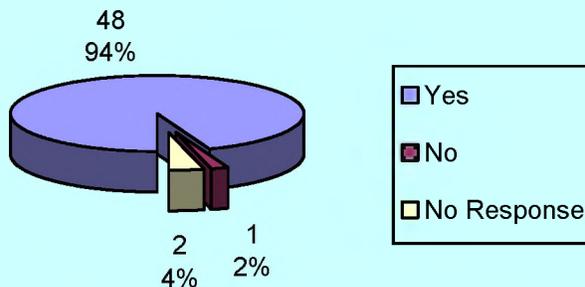
TABLE F-1	Have standards that ensure the document is secure for each threat listed in the Act for each DL or ID issued	Notes	Provided for by: Law, Procedure, Administrative Rule or Other
Jurisdiction			
Alabama	NO		N/A
Alaska	YES		Procedure
Arizona	YES		Procedure
Arkansas	YES		Procedure
California	YES		Administrative Rule
Colorado	YES		Law
Connecticut	YES		Procedure and Administrative Rule
Delaware	YES	Follow the 2000 DL/ID Standard.	Procedure
Florida	YES		Combination of all
Georgia	YES	To the best of GA's ability. Would like to have more security.	Procedure
Hawaii	YES		Other: Contract
Idaho	YES		Procedure and Specifications
Illinois	YES	By means of the card security requirements in our RFP (present contract).	Other: Contract
Indiana	YES	The Indiana signature over photo prohibits either from being cut out.	N/A
Iowa	YES	The current Iowa DL/ID has the standard as well as the new one will	Policy
Kansas	YES		Administrative Rule
Kentucky	YES		Other Broad statutory authority
Louisiana	YES		Law
Maine			
Maryland	YES	Follow AAMVA as a practice.	Other: Practice
Massachusetts	YES	Have state statues for penalties for anyone who counterfeits or alters a DL or ID.	Administrative Policy
Michigan	YES		Law
Minnesota	YES		Law
Mississippi	YES		Law; Procedure
Missouri	YES		Law Procedure
Montana	YES		Other: Through RFP contract with vendor
Nebraska	YES		Procedure
Nevada	YES		Contractually with vendor
New Hampshire	YES		Procedure
New Jersey	YES		Law
New Mexico	YES		-
New York	YES		Procedure
North Carolina	YES		Law and Policy
North Dakota	YES		Other: Based on what was available in 1995
Ohio	YES		Law Administrative Rule Procedure
Oklahoma	YES		Law Administrative rule Procedure

SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

TABLE F-1	Have standards that ensure the document is secure for each threat listed in the Act for each DL or ID issued	Notes	Provided for by: Law, Procedure, Administrative Rule or Other
Jurisdiction			
Oregon	YES	Oregon law requires the use of "security procedures, processes and materials ... that prohibit as nearly as possible anyone's ability to alter, counterfeit, duplicate or modify the license without ready detection." We used the list of security features in Annex H of the AAMVA DL/ID Standards - 2000 as the basis for choosing security features for our current card	Law and Other
Pennsylvania	YES		Procedure
Rhode Island			
South Carolina	YES		Policy
South Dakota	YES	Law doesn't require digital image but we do collect one. CDL law requires tamper resistance.	Partial Law/Partial Practice
Tennessee	YES		Law and Administrative Rule
Texas	YES		Law
Utah	YES		Law
Vermont	YES		Procedure
Virginia	YES	States that you must carry the photograph but the rest is handled by policy.	Law
Washington	YES		Procedure
West Virginia	YES		Law and Administrative Rule
Wisconsin	YES	We will comply fully once our new contract is in place. We may not have an OVD on the back due to space restrictions.	Procedure
Wyoming	YES	Addressed through the contract with the vendor.	Other
District of Columbia	YES		Policy

Summary: Almost all jurisdictions have standards that ensure the document is secure for each threat listed in the Act for each DL/ID issued. Standards are provided for through a variety of means.

Have standards to ensure the document is secure for each threat listed in the Act



SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

TABLE F-2	Follow the document security requirements as describe in AAMVA Card Design Specifications	Notes	Planning to introduce the common Level 1 security device (OVD) as developed by AAMVA	When common OVD will be introduced/Notes
Jurisdiction				
Alabama	YES	With the exception of hologram	NO	
Alaska	YES	Using 2000 specifications at this time	YES.	We use an OVD now and will adopt the new one.
Arizona	YES	For the most part- cannot store 125 name field characters. Do not incorporate the color pink	NO	Under construction
Arkansas	YES	We meet the minimum requirements contained in the DLA.	YES	We're using it now in level 1 (1 – 4) and the same for level 2.
California	YES		YES	When information is released from AAMVA, it can be included in our contract.
Colorado	YES	Have Levels 1,2, and 3	N/A	Hasn't been discussed-current OVD on card required by law
Connecticut	N/A		YES	Depends on contract and vendor.
Delaware	YES		YES	Need to determine the costs and when it can be done. Needs to be part of the national standard.
Florida	YES	Have a total of 14 security features	YES	Minimum of 4 years away unless FL does a contract amendment.
Georgia	NO	With the new RFP the document would exceed the specifications.	YES	May not be with the next RFP. GA is going to require the vendor to comply with the specifications eventually. Funding will need to be made available to help with full implementation.
Hawaii	YES		YES	Not for a while
Idaho	YES	For the most part	YES	Don't know when, but not opposed to it.
Illinois	YES		YES	We have one but it is not AAMVA developed.
Indiana	NO		NO	
Iowa	NO	Iowa will follow the standard with the new card roll out	YES	Not sure
Kansas	YES		YES	-
Kentucky	YES	We have an OVD	YES	Will be taken into consideration when we negotiate a new contract for 2007

SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

TABLE F-2	Follow the document security requirements as describe in AAMVA Card Design Specifications	Notes	Planning to introduce the common Level 1 security device (OVD) as developed by AAMVA	When common OVD will be introduced/Notes
Jurisdiction				
Louisiana	NO	Not the newest version. It will be taken into consideration in March 2007 during renegotiation of our contract.	YES	In our new contract in 2007
Maine				
Maryland	YES	Except for Level 3	YES	In the next card contract
Massachusetts	YES	Exceed AAMVA's requirements	Not sure	Currently using a Kinegram
Michigan	NO	We are currently using the AAMVA Best Practices that were in place in 1998.	YES	When we do our card re-design
Minnesota	NO	We just started issuing a new card in December, but would work toward it depending on costs next go around.	YES	We don't know when; within the next 5 years
Mississippi	YES	Digital photo, laminate, seals on laminate, micro-printing, UV ink, places we can see overt tampering, Control numbers, etc. We have 26 security elements.	NO	
Missouri	NO	It would depend on our contract re-bid in five years, but it would depend on costs as to how much we could incorporate. Current law requires certain things like organ donor information on the card, which creates space issues. Anything put on license (country for example) requires law to be passed.	To be determined	N/A
Montana	NO	In 2007 new contract will follow specs	YES	7/2007
Nebraska	NO	We follow those in effect in 12 /2002; We are waiting for specs to be approved, not 'draft'. Contract expires June 2008	N/A	We need more information and if we like it, would consider it.
Nevada	YES	Mostly	Would consider	
New Hampshire	NO	Do not meet all of them but are evaluating the elements.	Unsure	
New Jersey	YES		Under review	-
New Mexico	YES		YES	ASAP
New York	YES		YES	With release of new license (in 2005)
North Carolina	YES	Is written in the RFP.	YES	Will be in the new document in late 05
North Dakota	NO	Bar Code, Laminate, embedded card with color shift hologram.	YES	Planning to do it by RFP. By 2006
Ohio	YES	Extension of contract for 1 year.	YES	Not sure when. Will consider in 1 year.

SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

TABLE F-2	Follow the document security requirements as describe in AAMVA Card Design Specifications	Notes	Planning to introduce the common Level 1 security device (OVD) as developed by AAMVA	When common OVD will be introduced/Notes
Jurisdiction				
Oklahoma	NO	No, have overt and covert features. One forensic feature.	YES	5-6 years; Intent is to be in compliance with DLA. Can not be done in next 5 year because of current contract. Direction is to get AAMVA OVD.
Oregon	NO	Oregon's current cards include these security features: seal over photo, redundant data, altered font, gradient color, OVD security laminate, optically variable ink, fine line background, ghost image, overlapping data, security code, micro printing, UV ink, deliberate error, 1-D barcode, 2-D barcode, high security cardstock, and moiré pattern.	NO	We don't currently have plans to implement AAMVA's OVD but we may include it with our next RFP when we replace the current licensing system/contract in 2009.
Pennsylvania	YES/NO	Don't follow the zone layouts. Have number of security features in the documents.	YES	Hope to in 2006.
Rhode Island				
South Carolina	NO	Following the AAMVA 2000 DL/ID Standard. Have hologram, digital photo, etc. No covert security features.	YES	Next contract if feasible
South Dakota	NO	Not currently, but working towards full compliance. Security features: anti copy feature, ultra violet ink, 2D bar code, ghost image, applicant data on card core burned under the laminate in one step process, 18 th and 21 st birthday are listed in several places. Date driver turns 21 is printed on license, Under 21 printed on card, different color header bars, all cards have a uniform background- Mt. Rushmore.	YES	When contract is re-negotiated 2008
Tennessee	NO	TN continues to make improvements in the card security. Will be addressed in the new contract.	TBD	Is being evaluated for the specifications of the new RFP.
Texas	NO	No forensic or OVD	YES	When told what it is and how much it will cost.
Utah	NO	We will.	NO	
Vermont	NO	Not the new specs, but follow the older specs. Will be in the next contract renewal.	YES	Next contract. Have an OVD now but not the common OVD.

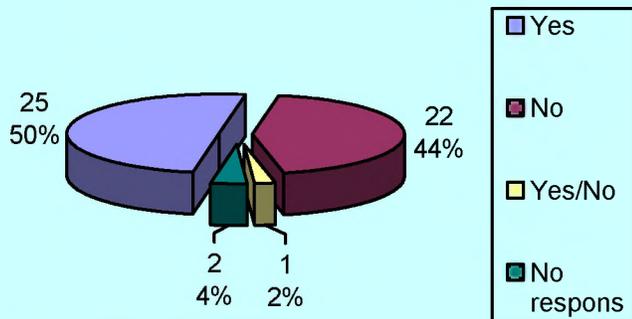
SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

TABLE F-2	Follow the document security requirements as describe in AAMVA Card Design Specifications	Notes	Planning to introduce the common Level 1 security device (OVD) as developed by AAMVA	When common OVD will be introduced/Notes
Jurisdiction				
Virginia	NO	Will be implementing this standard	YES	With new contract around 2006
Washington	YES	Have level 1, 2, and 3 now	YES	
West Virginia	NO	The new document will follow the requirements.	YES	With new card
Wisconsin	NO	See comments previous question	NO	Not until the contract following this one. Have level 1,2,3 - no OVD
Wyoming	YES		YES	As soon as available.
District of Columbia	YES		YES	With upgrade

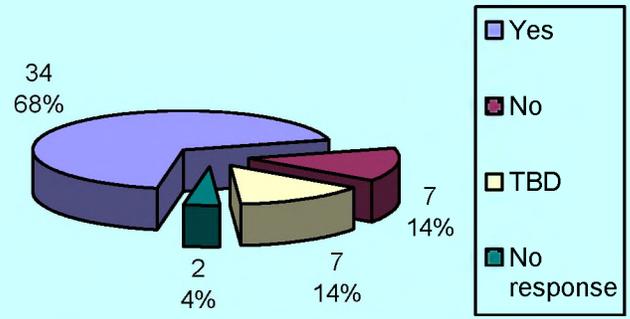
Summary:

1. Roughly, half of the jurisdictions follow the document security requirements as described in *AAMVA Card Design Specifications*.
2. Most jurisdictions are planning to implement the Common Level 1 OVD. Timing is tied to their next contract cycle.

Follow document security requirements



Planning to introduce the Common Level 1 OVD



SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

TABLE F-3	Planning to introduce a forensic security device on the document	Notes	Planning to introduce at least 4 additional security devices (for levels 1 and 2)	Notes
Jurisdiction				
Alabama	YES		YES	We have an OVD, it's just not AAMVA's
Alaska	NO	Not at this time	YES	Currently have 13 IN Levels 1 and 2
Arizona	YES		YES/NO	Currently using 2000 AAMVA standard, with 5 Level 1 & 2 devices. Under consideration to add more.
Arkansas	YES	We plan to do it	NO	We're already doing OVD and intend to introduce a forensic device.
California	YES		YES	
Colorado	YES	Currently use a watermark	NO	Have 5 now in Levels 1,2,3-not planning any additional
Connecticut	NO		YES	Already have 4 features for level 1 and 2.
Delaware	YES	Will consider it on the next contract. It will take a five year cycle to convert everyone over to the document.	YES	Currently have a number of security devices. Do not have an OVD or a forensic feature. Do capture the finger print.
Florida	YES	Already have forensic devices	YES	Already have done so. Have 14-17 security devices for level 1 and 2.
Georgia	YES		YES	
Hawaii	YES	On our new card	YES	
Idaho	NO	Don't currently see a need for it	NO	Not at this time-already have numerous Level 1 and 2, including UV, micro printing, holograph, overlap text and photo etc. Would add more if mandated.
Illinois	YES		YES	
Indiana	NO		NO	
Iowa	YES	Would not provide additional details	YES	-
Kansas	YES		YES	Have 10 or 11 now, including digital watermark
Kentucky	YES		YES	
Louisiana	YES	We have one now	YES	It will be taken into consideration in the new contract.
Maine				
Maryland	YES	Next Card Contract	YES	Planning to have complete security as required by AAMVA with next contract (only missing level 3 and OVD)
Massachusetts	YES	Have already done so	YES	Have 37 different security features in document now.
Michigan	YES	We have a digital water mark. We will look into it when we do our card re-design. We are undecided at this point	YES	With card redesign.
Minnesota	YES	We already have it	YES	

SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

TABLE F-3	Planning to introduce a forensic security device on the document	Notes	Planning to introduce at least 4 additional security devices (for levels 1 and 2)	Notes
Jurisdiction				
Mississippi	NO	We have one in place	NO	We already have 26 security devices now.
Missouri	NO	We already have one	NO	We have more than 4 now. If the requirement is for 4 more than we have, it would be hard to comply. We went through the courtesy verification (CVP) through AAVMA and we passed with shining colors.
Montana	Unknown	Will be determined by cost	Unknown	Goal is to achieve it but final will depend on cost.
Nebraska	YES	Digital watermark	NO	We already have 9 different security features
Nevada	YES		YES	In next contract. Currently have 3 in Levels 1 and 2
New Hampshire	YES		YES	
New Jersey	YES	Already have in place	YES	Already have in place
New Mexico	YES	But will most likely require legislative approval	YES	
New York	YES	Already exists on current license and will have new one on the new license.	YES	
North Carolina	YES	Will be in the new document in late 05	YES	Will be in the new document in late 05
North Dakota	YES	Planning to do it by RFP	YES	Planning to do it by RFP
Ohio	NO	More expensive.	YES	
Oklahoma	YES	OK already has forensic feature	YES	Intent is to follow DLA. In next contract goal is to be in compliance (not for next 5 years)
Oregon	NO	We don't find a definition of "forensic" in either the AAMVA DL/ID Security Framework or the AAMVA DL/ID Card Design Specification, but we used the definition "relating to the use of science or technology in the investigation and establishment of facts or evidence" to determine that we already have six forensic security devices: security code, micro printing, deliberate error, 1-D bar code, 2-D bar code, and high-security cardstock.	NO	Using Annex C of the AAMVA DL/ID Card Design Specification and Annex H of the AAMVA DL/ID Standards - 2000, we have nine Level 1 and 11 Level 2 security features. We think that's sufficient for now.
Pennsylvania	YES	Already have done so.	YES	Already have done so-Do not currently have an OVD.
Rhode Island				
South Carolina	YES	Will be looking at it	YES	
South Dakota	YES	-	YES	-
Tennessee	TBD	Is being evaluated for the specifications of the new RFP.	TBD	Is being evaluated for the specifications of the new RFP.
Texas	Unknown	In the process of vendor selection	Unknown	In the process of vendor selection
Utah	YES	In the new card-TBD	YES	We have 4 and will be adding 8 more

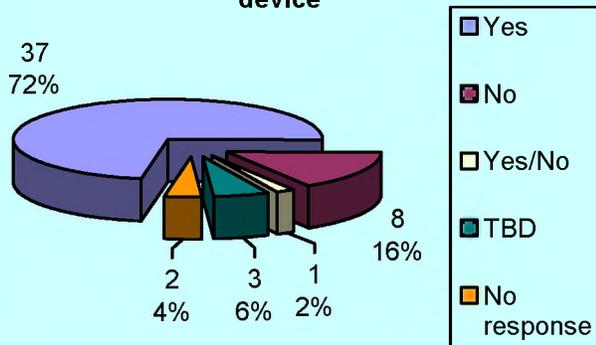
SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

TABLE F-3	Planning to introduce a forensic security device on the document	Notes	Planning to introduce at least 4 additional security devices (for levels 1 and 2)	Notes
Jurisdiction				
Vermont	YES/NO	Currently have a digital water mark. Will be looking more closely at the forensic device in the next contract.	YES	Already have 4 level 1 and 2 security devices.
Virginia	YES	With new contract around 2006	YES	With new contract around 2006.
Washington	YES	Always interested in improving security	-	
West Virginia	YES		YES	
Wisconsin	YES	There will be one.	YES	Implementation of new license will be 11/05
Wyoming	YES		YES	
District of Columbia	YES		YES	

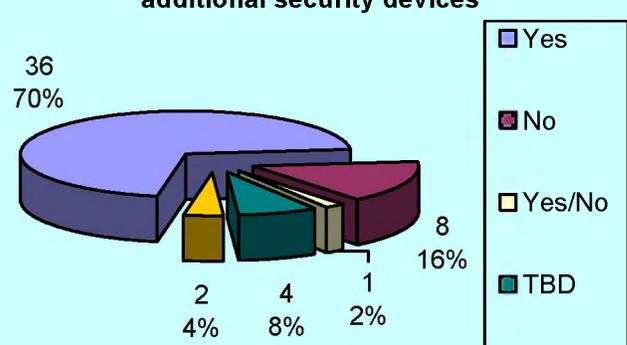
Summary/Conclusion:

1. Most jurisdictions are planning to introduce a forensic security device on the document or have already done so.
2. Most jurisdictions are planning to introduce at least four additional security devices (for levels 1 and 2) or have already done so.

Planning to introduce forensic security device



Planning to introduce at least four additional security devices



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SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

TABLE F-4	Period of validity for DL/IDs issued	Notes
Jurisdiction		
Alabama	4 years or expiration of visa for DL; 8 years for ID	DL = 4 years or expiration of visa for foreign nationals; ID = 8 years, If over age 62, the ID card is good for the remainder of life.
Alaska	-	
Arizona	-	
Arkansas	4 Years	Learner's permits (paper, issued by state police) are good for up to 6 months. We have 'under 21' licenses that expire after 4 years but when you turn 21, you may come in and get a duplicate without 'under 21' on it. We have a graduated license program in effect: 14 – 16 for learners; 16 - 18 for an intermediate license. A regular license can be issued after 18 with six months driving experience.
California	5-10 years	5 years for DL; 6 for ID; 10 for senior ID
Colorado	5-10 years	10 years 21-65 5 years for 65 and older
Connecticut	4 years	4 years on CDL, 6 years non-commercial, 4 years on an ID card. Do not issue an ID card if they have a DL. – validity periods vary.
Delaware	5 years	5 years for DL and 4 years for ID.
Florida	6 years DL; 4 years ID	60 or older on ID cards are permanent
Georgia	4 years	4 years both DL and ID
Hawaii	2-6 years DL; 6 years ID	DL = 6 years for 18 – 71; 4 years for 16 -18; 2 years for over 71. A Graduated license bill is in the current legislature and will be effective in 2006 if it passes. We have a CDL under US Patriot Act that is 5 years. ID Card is good for 6 years.
Idaho	4-8 years	
Illinois	1-4 years DL; 5 years- no limit for DL	DL = 4 years (21 – 80); 2 years age 81 – 86; 1 year 87 & over. 1st issuance for 16 - 21 years old, expires 3 months after the 21st birthday. ID = 5 years; Disabled ID good for 10 years; 65 and older ID -non-expiring.
Indiana	4 years	
Iowa		
Kansas	-	
Kentucky	4 years	DL = 4 years, ID cards = 4 years; non US citizen – end of stay has 4 special categories that receive a 4 year license: Refugees, Asylees, Parolees, K1 status (fiancé/marriage type situation).
Louisiana	4 years DL; 2-4 years ID	DL = 4 years; ID card = 4 years; and permanent validity for those over age 70. Under 16, you have an option of getting an ID card for 2 or 4 years - your choice.
Maine		
Maryland	5 years	5 years over 21 (expires on birthday). ID card 5 years. Under 21 60 days after birthday
Massachusetts	5 years	
Michigan	4 years	DL= 4 years; Under 21 license is good until you turn 21. ID card = 4 years.
Minnesota	4 years	DL = 4 years, ID = 4 years. Under 21 expires on 21st birthday. 65 and older is valid for lifetime. Provisional (under 18) valid for 2 years. Instruction permit (hard card) is valid one year.
Mississippi	4 years	Non-citizen card is good for 1 year.
Missouri	2-6 years	DL = 6 years for those 21 – 69. Under 21 or over 70 = 3 years. 16 – 18 = 2 years. A CDL driver with HAZMAT is variable up to 5 years based on background check. Effective July 1, 05, expiration of documents issued to immigrants will be tied to the expiration date of immigration documents.
Montana	8 years	Pro rate up to 21. 21 – 67 is 8 years validity. After that again pro rate. Maximum of 8 years. After 75 validity of 4 years. Not always expiration dates on ID cards (no longer issued) –new ones have expiration date.
Nebraska	5 years	Under 21 expires on 21 st birthday.
Nevada	-	

SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

TABLE F-4	Period of validity for DL/IDs issued	Notes
Jurisdiction		
New Hampshire	5 years	Same for all documents
New Jersey	4 years	Yes – for non-citizens and other exceptions
New Mexico	-	
New York	8 years DL; 5-10 years ID	Some IDs valid for 5 and 10 years. Children under 16 is 5 years.
North Carolina	5-8 years	Up to 8 years. Have a 5 year renewal cycle. Term will depend on getting the person into the 5 year renewal cycle. Documents do not vary from CDL to non-CDL.
North Dakota	4 years DL/10 years ID	Driver License is good for 4 years. Our non - driver ID card is good for 10 years. There are no variations.
Ohio	4 years*	4 years (4th birth day after day of issuance). Under 21 is 5 years. (1-5 years validity -20 years: 1 year validity end so forth).
Oklahoma	4 years	Tied to end of stay
Oregon		
Pennsylvania	2-4 years	4 years unless a non-US citizen or individual is over 64 and they can opt for a 2 year renewal. Law requires them to make this option available for the older clients.
Rhode Island		
South Carolina	5-10 years	10 for non-CDL and citizens only and you get it in a field office in person. By web or mail in is good for 5 years. All CDLs for 5 years. Resident non-citizens for 5 years. Non-permanent immigrant a minimum of 1 year and not more than legal presence of stay. 65 or older is for 5 years.
South Dakota	5 years	DL = 5 years unless turning 21, then expires 30 days after 21 st birthday; Immigrant licenses based on end of stay. ID cards have same validity period.
Tennessee	3-7 years	3-7 years depending. Basic renewal is 5 years. The 3-7 years will vary to bring them in line with the 5 years in correlation to their birth date divisible by 5.
Texas	-	
Utah	5 years DL; ID 10 years	
Vermont	2 and 4 years	Four is the maximum.
Virginia	3-7 years	Maximum of 7 years. 3-7 years to get them into a 5 year renewal cycle. Unless here temporarily then in correlation with legal presence.
Washington	5 years	
West Virginia	5 years	Can vary from 3-7 depending on when you enter the system.
Wisconsin	8 years DL; 4 years ID	First issuance could be 3 years from next birthday or 2 years from next birthday. Same for reinstatements Temporary instruction permits are good for one year. Motorcycle permits are valid for six months. We will send this information to AAMVA. We also have a probationary license under certain conditions.
Wyoming	4 years	
District of Columbia	5 years	Falling on birthday

Summary: DL/ID issuance periods range from two to ten years.

SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

TABLE F-5	Allow renewal by mail	Number of times before customer must come into the MVA	Allow renewal by internet	Number of times before customer must come into the MVA	Notes
Jurisdiction					
Alabama	NO		NO		We will do renewal out of state for military and students but the license must be mailed to a valid Alabama address and there must be a signature and photo on file.
Alaska	-		-		
Arizona	-		-		
Arkansas	YES	N/A	NO		We allow renewal by mail only for active duty service personnel. This is valid without photo.
California	YES	2 BMS if criteria is met	YES	-	Yes if the SSN has already been verified and you meet the same criteria required to renew by mail
Colorado	YES	Every other renewal	NO		If eligible for renewal by mail, can download form from Internet-have legislation pending for renewal over Internet
Connecticut	YES	For military only	NO		
Delaware	NO	-	NO	-	Plan to in the future.
Florida	YES	2 terms by mail	YES	2 terms by internet	For both, must qualify (e.g., medical driving record, foreign national, etc.)
Georgia	YES	Every other time	YES	Every other time	
Hawaii	YES	2 times	NO	N/A	Twice before coming into the MVA. We have an exemption for resident military personnel – valid without photo with no limit on the number of times they can renew by mail. This will change with our new license contract and we will begin putting an old image on all renewals by mail. Most RBM are folks out of state at the time of renewal or students or military. We require them to have a vision and physical exam by a doctor in order to renew by mail, so not many people do it.
Idaho	YES	Every other card	NO		
Illinois	YES	1 time	YES	Same as for renewal by mail or phone	If you are a safe driver ages 25 – 74, one time. It is not available for school bus drivers or for CDLs. There are also other eligibility requirements.
Indiana	YES	Every other time-using an existing image	YES	Every other time-using an existing image	
Iowa	-	-	-	-	
Kansas	-	-	-	-	
Kentucky	NO		NO		
Louisiana	YES	Every other renewal	YES		We do not allow CDL to be renewed by mail, interactive voice response or internet. Applicants must appear in person to renew CDL.
Maine					

SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

TABLE F-5	Allow renewal by mail	Number of times before customer must come into the MVA	Allow renewal by internet	Number of times before customer must come into the MVA	Notes
Jurisdiction					
Maryland	YES	1 mail renewal	NO	-	Yes. Photo on file, no suspension or revocation. Last transaction in person. Over 40 vision test. 1 renewal by mail. Next again walk in.
Massachusetts	NO		YES	Every other cycle or once every 10 years.	
Michigan	YES	Every other time	NO		
Minnesota	YES		NO		We only allow RBM if the applicant is out of state at time of expiration and only one time. They could do it every other time, however.
Mississippi	YES		YES		Military personnel and dependents can renew by mail and receive a valid without photo card, as long as they are active duty. One time in 8 years.
Missouri	YES	N/A	NO		We have a mail in application for those in the military who are out of state. For others who are out of state at the time of renewal, we will renew if they have an image on file.
Montana	YES	1 mail renewal-next in person	NO		Out of state. Some communities where no service is provided. (Bill pending-will pass – allowing military personnel and family members to do renewal 2 times before having to come in.
Nebraska	YES		NO		For a small percentage of people who are out of state when it's time to renew (800 per year). Many are valid without photo. In the spring of 2003 we started digital image processing. We have authority to build an electronic renewal process. This language requires update of photos every 10 years.
Nevada	-	-	-	-	
New Hampshire	NO		NO		
New Jersey	NO		NO		
New Mexico	-	-	-	-	
New York	YES	No limit	YES	No limit	DL must provide proof of the eye test with Dr. certification number which is verified. Some limits. You can not go on line and do a chance of address and then order a duplicate. Have just started and have not set a limit.
North Carolina	YES/NO	People out of country or state can.	NO		Will do duplicates via internet. Legislation has been introduced to provide for internet renewals.
North Dakota	YES	1 time possibly every other time	NO	-	If the applicant is out of state at time of renewal, they can renew by mail. They can do it one time. They could possibly do it every other renewal period.
Ohio	NO	-	NO	-	
Oklahoma	YES	-	NO	-	Non CDL. Out of country Information will be mailed (e.g. military personnel).
Oregon	NO	-	NO	-	We no longer renew driver licenses by mail as

SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

TABLE F-5	Allow renewal by mail	Number of times before customer must come into the MVA	Allow renewal by internet	Number of times before customer must come into the MVA	Notes
Jurisdiction					
					of October 4, 2004.
Pennsylvania	YES	Must come in with every renew to have picture taken	YES	Must come in with every renew to have picture taken	
Rhode Island					
South Carolina	YES	1 cycle	YES	1 cycle	Only for citizens
South Dakota	YES*	N/A	NO	N/A	Only for military and military dependents, Peace Corps and missionaries. They must have new photo every ten years.
Tennessee	YES	Every other renewal cycle	YES	Every other renewal cycle.	
Texas	-		-		
Utah	YES	Every other cycle	YES	Same as RBM	
Vermont	YES	1 cycle – states in statue	NO		Can reproduce photo one time then must come in. If licensed prior to July 1, 2004 can renew by mail indefinitely. Will allow renewal by Internet eventually.
Virginia	YES	Every other renewal	YES	Every other renewal	
Washington	YES	Only if out of state-project underway to implement regular RBM	YES	Every other time	
West Virginia	NO		NO		Only for military personnel. They only get a driving record and when they return their license is updated and they get a new photo DL.
Wisconsin	NO/YES		NO		Exception for military or persons out of country at time of renewal")
Wyoming	YES	Every other time	NO		
District of Columbia	YES	Every other cycle.	YES	Every other cycle	

Summary:

1. Most jurisdictions allow for renewal by mail every other cycle.
2. Roughly, half of the jurisdictions allow for renewal by internet every other cycle.

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SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

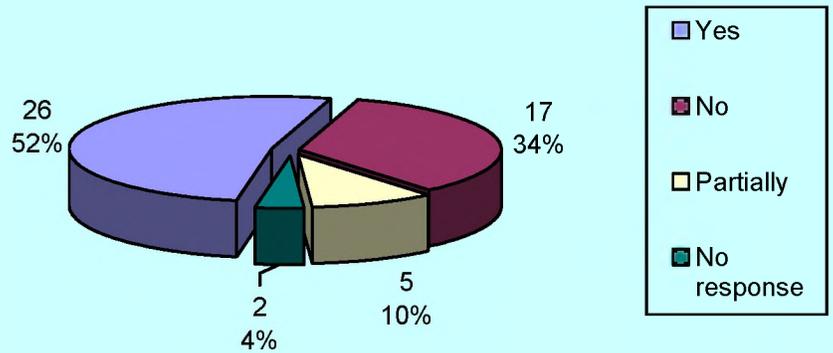
TABLE F-6	Meet or exceed the requirements developed by the DLA and AAMVA Security Framework	Notes
Jurisdiction		
Alabama	YES	
Alaska	YES	Mostly
Arizona	NO	Not yet
Arkansas	YES	
California	YES	Yes, we expect to meet or exceed the AAMVA requirements with our new contract.
Colorado	YES	Mostly
Connecticut	YES/NO	
Delaware	YES	Just don't have the forensic and OVD feature in the document.
Florida	YES	
Georgia	NO	The new system will exceed.
Hawaii	YES	
Idaho	NO	
Illinois	NO	Not right now. It is a goal. It is dependent on costs.
Indiana	NO	
Iowa	NO	With the new system and documents, with the exception of OVD (initially), will have Iowa nearly compliant.
Kansas	YES	Mostly, cannot capture 125 characters in name field without complete system redesign.
Kentucky	YES	We do not meet all card design specifications, but do meet security features components.
Louisiana	NO	
Maine		
Maryland	YES	Just missing level 3 and OVD. Will have them in place with next contract. August 2006.
Massachusetts	YES	
Michigan	NO	
Minnesota	YES	Except for OVD. Our magstripe might be a little different. We had some difficulty making magstripe work with intoxilizer which is very important. We might have to make a small change to meet AAMVA standard, but any change would have to be planned and would take more than a year to do outreach.
Mississippi	NO	We will never meet them unless we have a federal mandate.
Missouri	NO	
Montana	NO	
Nebraska	NO	
Nevada	NO	Not exactly
New Hampshire	YES/NO	Are implementing many of the elements.
New Jersey	YES	
New Mexico	YES	
New York	YES	They exceed
North Carolina	YES	
North Dakota	YES	(in the future)
Ohio	YES	Yes except for level 3 feature. Level 1 (OVD) will be added as soon as feasible.
Oklahoma	YES	Yes except for common OVD
Oregon	NO	Our card currently does not contain the standard OVD defined in the standards, physical layout of data in the defined zones, and the horizontal vs. vertical license for minors.
Pennsylvania	YES	Most of the standards.
Rhode Island		
South Carolina	NO	
South Dakota	YES	

SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

TABLE F-6	Meet or exceed the requirements developed by the DLA and AAMVA Security Framework	Notes
Jurisdiction		
Tennessee	NO	Is being evaluated for the specifications of the new RFP.
Texas	-	
Utah	NO	Not entirely. Can't capture 125 characters and do not use pink color
Vermont	YES/NO	We do not have the unique OVD but we do comply with size and barcode
Virginia	YES/NO	Do not meet the current card deign specifications but will with a new contract.
Washington	YES	
West Virginia	YES/NO	Will meet the standard with the new WV document.
Wisconsin	YES	Except OVD
Wyoming	YES	
District of Columbia	YES	Will make improvements in the D.C. documents.

Meet or exceed the requirements developed by the AAMVA Security Framework and the DLA

Summary: More than half of the jurisdictions meet or exceed the requirements developed by AAMVA in the DLA and *AAMVA Security Framework*.



SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

TABLE F-7	The minimum standard for document security for driver's licenses and personal identification cards should be:
Jurisdiction	
Alabama	We support the framework as a good foundation. Again, you should be able to meet the minimum. Requirements without having to purchase an OVD from AAMVA.
Alaska	AAMVA Standard
Arizona	AAMVA Standard
Arkansas	AAMVA card design specifications
California	AAMVA standards proposed
Colorado	Framework
Connecticut	Agree with the AAMVA Framework.
Delaware	Should be the 2000 AAMVA DL/ID Standard plus the common OVD. Digital image exchange. Need to be able to do one-to-many facial recognition. The ability to capture a biometric and send / receive the biometric.
Florida	The AAMVA Framework
Georgia	The AAMVA standards. You may want to do more than the AAMVA standard as contract cycles are 6+ years.
Hawaii	AAMVA card design specifications
Idaho	Framework is good
Illinois	AAMVA card design specifications.
Indiana	AAMVA card design specifications
Iowa	The AAMVA DL/ID Security Framework
Kansas	DLA/Framework
Kentucky	We support the DLA and Framework. One of the big problems out there right now, is a person gets a duplicate, and sells it.
Louisiana	We support the Framework.
Maine	
Maryland	Security Framework – Card design specifications
Massachusetts	What MA has done with their new license now.
Michigan	AAMVA card design specs.
Minnesota	We support the Framework
Mississippi	Each state should make their own security requirements for their own documents.
Missouri	No comment
Montana	DLA and DL/ID security framework
Nebraska	DLA and Framework plus standardized biometric.
Nevada	Sufficient in Framework
New Hampshire	Should have a minimum of four security devices in the document. One should be common. Two that can be trained on and one for the forensic level. There should be three layers of security.
New Jersey	Utilize the AAMVA standards.
New Mexico	Those standards proposed by AAMVA.
New York	States should consider designing the document with security in mind instead of looks. Should be a combination of overt and covert security features.
North Carolina	AAMVA Framework
North Dakota	AAMVA Standard
Ohio	AAMVA card design specifications
Oklahoma	DLA standards.
Oregon	The standards should leave as much room as possible for jurisdictional differences, and should not be overly prescriptive.
Pennsylvania	The AAMVA standard should be used.
Rhode Island	
South Carolina	General agreement with the standards. Need to have a better baseline. Establish a baseline for establishing the validity of the document on the frontline. Need to be comfortable with other documents coming into SC. Also need to have electronic verification. SC is decentralized and examiners don't have a lot of time to validate these documents.
South Dakota	AAMVA card design specifications were developed by a team of experts and should continue to be used.
Tennessee	-
Texas	-

SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

TABLE F-7	The minimum standard for document security for driver's licenses and personal identification cards should be:
Jurisdiction	
Utah	AAMVA's requirements minus the 125 characters and pink color
Vermont	The AAMVA standard. Security features should be changed periodically. LE and DMV are going to have to be aware of any changes.
Virginia	Virginia is comfortable with the overall requirements of the Security Framework. There are some concerns however related to the costs and administrative requirements of the OVD.
Washington	DLA/Framework
West Virginia	The AAMVA Standard in the Framework.
Wisconsin	The AAMVA standard. Someone should continue to monitor this requirement due to new options that will be coming available as we move forward
Wyoming	The AAMVA Framework – Card Design Specifications
District of Columbia	AAMVA Framework and DLA.

Summary: Generally, the states support the *AAMVA Security Framework* and the DLA for minimum standards for document security for driver's licenses and personal identification cards.

SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

TABLE F-8	Comments to assist in the development of minimum standards for information to be included on machine-readable technologies.
Jurisdiction	
Alabama	-
Alaska	-
Arizona	-
Arkansas	-
California	Currently, the minimum requirements for security standards protect against certain threats to the license (counterfeit, alteration, photo substitution and cannibalism. AAMVA has suggested in the past that jurisdictions implement a number of features to protect the card, but there is no mention as to the quality of the security features. In developing these guidelines the efficiency of the card security features should also be evaluation when establish minimum requirements.
Colorado	-
Connecticut	Need time to implement and funding.
Delaware	It would be nice to be able to identify the type of license that the previous jurisdiction issued (level 1, 2 or 3) to help determine if it is fictitious or not. All jurisdictions need to issue digital DLs/IDs.
Florida	If a mandate is going to require a smart chip, DOT better be prepared to fund it. This is an item that should not be unfunded.
Georgia	Federal government needs to be prepared to assist with funding to be successful.
Hawaii	HI will be the first to have first half inch of card as per AAVMA standard.
Idaho	-
Illinois	-
Indiana	-
Iowa	Utilize the AAMVA DL/ID Security Framework
Kansas	-
Kentucky	There has to be some kind of back end approach to check on multiple IDs, like facial recognition. PDPS dummy records just create a huge problem. The DLA approach tying everything to a DCR is better.
Louisiana	We get a lot of licenses without an issue date. We think an issue date should be required. We would like states to cease using classes ABC for non-CDLs. Those should be reserved solely for CDLs. CDL learner's licenses should be conspicuously marked 'Permit Only'.
Maine	
Maryland	-
Massachusetts	-
Michigan	We don't think the problem is with the card. We do not see much evidence of counterfeiting. The problem is with verifiability issues: especially with breeder documents.
Minnesota	-
Mississippi	We need grant money.
Missouri	-
Montana	DLA and DL/ID security framework
Nebraska	-
Nevada	-
New Hampshire	Funding needs to be considered. Security elements are expensive. Customer service issues need to be considered. Need to balance security with service.
New Jersey	There should be some commonality among the state to ensure that the document can be authenticated.
New Mexico	None
New York	See previous question.
North Carolina	Funding need which will be around \$1.80 per card.
North Dakota	We would like the AAMVA card design specifications document in final form, not DRAFT version. We need a final version to draft an RFP.
Ohio	-
Oklahoma	Implementation of DLA and membership.
Oregon	-
Pennsylvania	Time and Money
Rhode Island	

SECTION F: The Act requires the development of security standards to ensure that driver's license or personal identification card are; (i) resistant to tampering, alteration, or counterfeiting, (ii) capable of accommodating and ensuring the security of a digital photograph or other unique identifier.

TABLE F-8 Jurisdiction	Comments to assist in the development of minimum standards for information to be included on machine-readable technologies.
South Carolina	Need consistency and need to consider the costs and funding to the states. Security features are to prevent tampering, clerks need to be able to recognize the document and then have electronic verification systems available.
South Dakota	-
Tennessee	-
Texas	-
Utah	-
Vermont	-
Virginia	-
Washington	-
West Virginia	Some type of overlay needs to be on the document. Micro printing is very helpful.
Wisconsin	-
Wyoming	Need funding
District of Columbia	-

Summary: DOT will need to provide sufficient funding for document security. Additionally, reasonable time-frames will be required given jurisdictional contract periods. See additional comments above.

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Section G

The Act requires that a state confiscate a driver's license or personal identification card if any component or security feature of the license or identification card is compromised.

SECTION G: The Act requires that a State confiscate a driver's license or personal identification card if any component or security feature of the license or identification card is compromised.

TABLE G-1	Require confiscation of DL or ID if any component or security feature is compromised	Notes	Provided for by: Law, Procedure, Administrative Rule or Other
Jurisdiction			
Alabama	YES		Law
Alaska	NO	Only confiscate Alaskan issued DL/ID cards. If fraud is suspected, we photocopy of suspected document. Sometimes people will run from the office and leave documents behind.	
Arizona	NO	Legislation has been introduced however.	Legislation
Arkansas	YES	This is only on a card we have issued. We do not confiscate out of state issued documents.	Administrative Rule
California	NO	Although in cases of fraudulent cards the card maybe picked up by a field office employee or investigator.	
Colorado	YES		Law
Connecticut	YES	Does not say must confiscate, but gives the authority.	Law
Delaware	NO	Only LE can confiscate documents.	N/A
Florida	YES/NO	FL does confiscate documents with it being a hazard to the examiner.	N/A
Georgia	Yes/No	Have been told by Attorney General that their examiners do not have the authority to confiscate out-of-state documents but can confiscate GA documents. LE can confiscate any documents.	Law
Hawaii	NO	It is illegal to possess a card that is defaced, fictitious or altered. Police and DL employees have authority to confiscate these cards. If arrested, a police officer would confiscate the cards to use for evidence	
Idaho	YES/NO	Have authority in statue-indirectly	Law
Illinois	NO	Permissive law, but we do keep IL issued documents.	N/A
Indiana	NO		N/A
Iowa	YES	May confiscate. Driver Services in Iowa is authorized to confiscate fraud documents by law but is not required to, however, it is required by policy (any identification document) Their code uses the terms altered, counterfeit or fraudulently obtain.	Law
Kansas	NO	No, not in statute, but we do confiscate DL sometimes.	
Kentucky	NO	Law enforcement, ABC, and court clerks do confiscate, but we don't think it is required and is not routinely done. Cards are confiscated on a case by case basis (if obvious). We're probably not confiscating out of state documents at all – not the property of this state.	Law
Louisiana	NO	We can confiscate them but won't put our employees in danger. Portions of the LA card design are copyrighted (artwork). Persons making counterfeit DL are charged with copyright infringement.	N/A
Maine			

SECTION G: The Act requires that a State confiscate a driver's license or personal identification card if any component or security feature of the license or identification card is compromised.

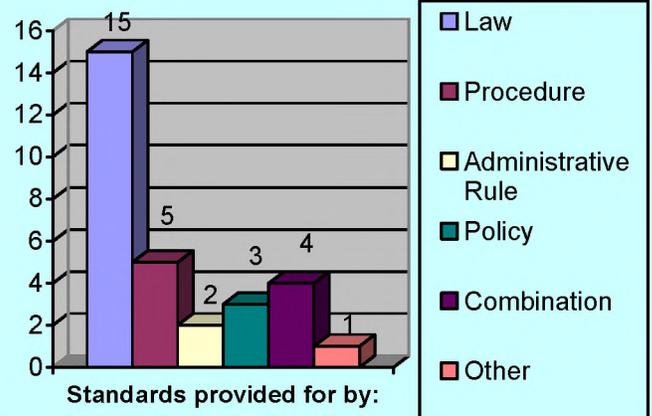
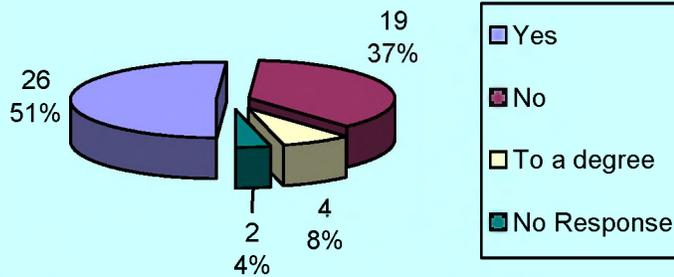
TABLE G-1	Require confiscation of DL or ID if any component or security feature is compromised	Notes	Provided for by: Law, Procedure, Administrative Rule or Other
Jurisdiction			
Maryland	YES	Confiscate – case file – after adjudication – retained for up to 3 years – either destroyed or used for training.	Law/Regulation
Massachusetts	NO		N/A
Michigan	NO	We may, but are not required to confiscate. If we find false statements or untrue information, the law requires us to confiscate a license or ID card.	N/A
Minnesota	YES	DL staff can confiscate MN cards by law. Agents do not have authority to confiscate licenses based on liability issues and customer service issues. Also, security is a concern: in 2-man operation where one is out on road test, we don't want an examiner to get in a confrontational situation. Same applies in large offices where confrontation could endanger other customers. We are not allowed to confiscate federal documents. Law enforcement and alcohol/tobacco retailers can confiscate if they suspect under age.	Law; Anti-fraud procedures
Mississippi	YES	Law as far as fraudulent documents is concerned. (It is a misdemeanor [to possess?] if the person is under 18 and a felony over 18)	Law
Missouri	YES	DL staff and law enforcement will confiscate a MO license or ID. Tobacco and alcohol retailers will confiscate for under age and for tampering. We don't confiscate documents we do not issue.	Procedure
Montana	NO	Concern for field staff is reason not to have them take action.	-
Nebraska	NO	Only law enforcement has authority.	
Nevada	NO	Not required, but do pick up	N/A
New Hampshire	YES	All documents that are compromised are confiscated.	Law
New Jersey	YES		Criminal Statue
New Mexico	YES	Only those issued by NM	Law
New York	YES	Frontline staff can confiscate. If the frontline clerk is at risk they can give them back if LE is not available. As soon as the documents are seized NY puts a stop on the name and DOB.	Law and Procedure – it is a felony in New York and must be retained for investigative purposes
North Carolina	NO	Do not have legal authority to confiscate documents. Depending on the documents NC will need to have a change in law.	
North Dakota	YES		Other: Examiner procedures.
Ohio	YES	Standing operation procedure. Will send additional information.	
Oklahoma	YES	Any document perceived to be compromised. Confiscate all documents that a person presents (even if only 1 is fraudulent). Valid documents will be returned.	LAW
Oregon	NO		
Pennsylvania	NO	Not required. Do train staff to confiscate when possible.	Other-through fraud training
Rhode Island			

SECTION G: The Act requires that a State confiscate a driver's license or personal identification card if any component or security feature of the license or identification card is compromised.

TABLE G-1	Require confiscation of DL or ID if any component or security feature is compromised	Notes	Provided for by: Law, Procedure, Administrative Rule or Other
Jurisdiction			
South Carolina	NO	The DMV does not confiscate documents, LE does. They do not put their employees in an unsafe position.	N/A
South Dakota	YES	Penalties in law for use of compromised license.	Policy
Tennessee	YES	Can confiscate any document that is fraudulent or presented by an imposter.	Procedure
Texas	YES	In policy and attorney general opinion	Policy
Utah	YES	Yes, we have procedures and there is pending legislation.	Procedure
Vermont	YES		Law
Virginia	YES	But only VA documents if they are suspicious. Only confiscate other is specified by LE but does not happen often.	Administrative Rule
Washington	YES/NO	Only WA documents	Procedure
West Virginia	YES		Law
Wisconsin	YES	The authority applies to DL staff and Law enforcement.	Policy and Law
Wyoming	YES	Confiscate WY documents. Will confiscate other state documents if they are really bad and will return to the state. Do not confiscate all the time.	Procedure
District of Columbia	YES		Policy

Summary: Roughly, half of the jurisdictions are required to confiscate the DL/ID if any component or security feature is compromised. Some jurisdictions are only authorized to confiscate their own documents. Some jurisdictions turn the documents immediately over to LE or work cooperatively with LE in the MVA offices.

Required to confiscate documents



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SECTION G: The Act requires that a State confiscate a driver's license or personal identification card if any component or security feature of the license or identification card is compromised.

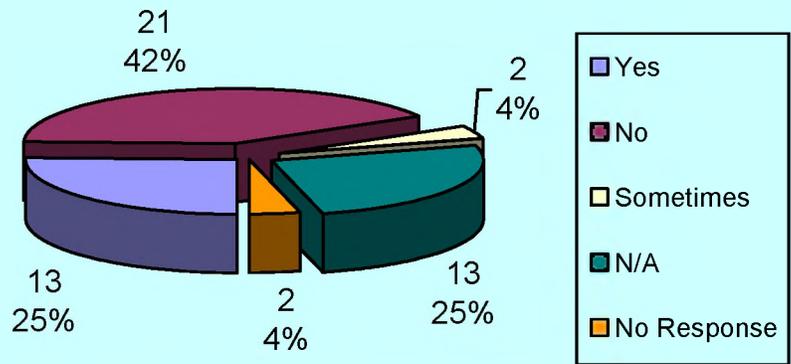
TABLE G-2	Confiscated documents are destroyed	Notes
Jurisdiction		
Alabama	YES	After the case is adjudicated.
Alaska	N/A	Only confiscate Alaskan issued DL/ID cards. If fraud is suspected, we photocopy of suspected document. Sometimes people will run from the office and leave documents behind.
Arizona	NO	
Arkansas	YES	
California	NO	
Colorado	NO	Not usually
Connecticut	YES	Save them for evidence purposes.
Delaware	N/A	
Florida	YES	Those not destroyed are use for training
Georgia	N/A	When DMV confiscate anything, if it is used for evidence or a case, eventually they shred them. Have a waiting period to allow for appeals.
Hawaii	YES	Unless it's needed for prosecution
Idaho	NO	
Illinois	NO	They are sent to the fraud unit or police.
Indiana	N/A	
Iowa	NO	The customer is given a receipt that Iowa has retained their documents and then the documents are given to law enforcement.
Kansas	YES/NO	Sometimes
Kentucky	YES	
Louisiana	N/A	
Maine		
Maryland	YES	Inventory controls procedure.
Massachusetts	N/A	
Michigan	N/A	
Minnesota	NO	We have to keep it for 180 days for due process where the person can meet with an evaluator to prove it is acceptable or that there is other documentation supporting a questionable card.
Mississippi	NO	They are turned over to our crime lab for disposition.
Missouri	YES	
Montana	N/A	Some documents get to HQ. They will be destroyed.
Nebraska	N/A	
Nevada	NO	
New Hampshire	NO	Use for evidence and training.
New Jersey	YES	Unless needed for evidence for prosecution
New Mexico	NO	
New York	YES	Hold them for prosecution.
North Carolina	N/A	
North Dakota	NO	We turn it over to law enforcement or Border Patrol
Ohio	YES	If something is wrong will be destroyed in time. (following case pending) Some will be used for training purposes.
Oklahoma	NO	Maintained on file in records.
Oregon	N/A	
Pennsylvania	YES	First they are forwarded to the Office of Risk Management for evidence and possession. They destroy if not used for training.
Rhode Island		
South Carolina	N/A	
South Dakota	NO	Law enforcement uses it for evidence. We do shred cards that are worn out.
Tennessee	NO	Are turned over to the originating agency with a fraudulent documentation confiscation report (new procedure in TN).
Texas	NO	

SECTION G: The Act requires that a State confiscate a driver's license or personal identification card if any component or security feature of the license or identification card is compromised.

TABLE G-2	Confiscated documents are destroyed	Notes
Jurisdiction		
Utah	NO	
Vermont	NO	They are sent to the criminal investigators
Virginia	NO	Turn them over to the Investigative Services Division.
Washington	YES/NO	Sometimes
West Virginia	N/A	All documents are sent to the fraud unit. Then upon investigation and/or prosecution documents are destroyed or utilized for training purposes.
Wisconsin	YES	Turned over to law enforcement or used for training
Wyoming	NO	Use the documents for the case. Send others state documents back to the states following the case.
District of Columbia	NO	Turn them over to LE.

Destroy confiscated documents

Summary: Of those jurisdictions that do confiscate documents, most indicated that they do not destroy the documents. Almost all jurisdictions indicated that they turn the documents over to LE or an internal investigative unit for evidence and prosecution. Almost all jurisdictions who confiscate indicated they try to use the documents of fraud training purposes when the documents are no longer needed for evidence and prosecution. Roughly a quarter of the jurisdictions destroy the documents if not used for fraud training purposes.



SECTION G: The Act requires that a State confiscate a driver's license or personal identification card if any component or security feature of the license or identification card is compromised.

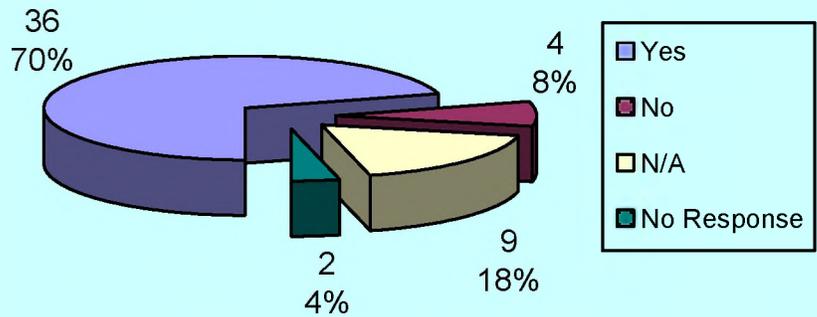
TABLE G-3	Authorized to use confiscated documents for training	Notes
Jurisdiction		
Alabama	YES	
Alaska	YES	Some are.
Arizona	-	
Arkansas	YES	Shred them.
California	NO	We don't.
Colorado	YES	Pick them up and turn over to investigations.
Connecticut	YES	
Delaware	N/A	
Florida	YES	
Georgia	YES	But eventually they must be shredded.
Hawaii	YES	The law is permissive, not mandatory. As far as we know all are confiscated. This only applies to HI issued cards. We would not necessarily know an out of state issued card was fraudulent. We would confiscate it if we knew it to be fraudulent.
Idaho	YES	If document is not confiscated, individual's name will be flagged in system to indicate a possible fraudulent document has been used.
Illinois	NO	
Indiana	N/A	
Iowa	YES	Documents must be disposed of according to Iowa rules. As LE does the training they can use them.
Kansas	YES	They are forwarded for review
Kentucky	NO	
Louisiana	N/A	
Maine		
Maryland	YES	Some documents will be used for training.
Massachusetts	N/A	Get documents though LE. And use authentic DL that are used for transfers.
Michigan	YES	This is not prohibited by statute. If we do confiscate it, we destroy it. If it's a case of fraudulent activity, we retain it for prosecution. Police pick up suspect licenses routinely.
Minnesota	YES	We do it a lot. We use suspected fraud procedures: it goes back to an evaluator.
Mississippi	YES	We just do it.
Missouri	NO	
Montana	N/A	
Nebraska	YES	We do use them for training when we get them. If law enforcement sends us one, we cancel it and maybe use it for training.
Nevada	YES	Kept with case file or could be returned to jurisdiction. Investigators in all offices to deal with this.
New Hampshire	YES	Evidence and Training
New Jersey	YES	
New Mexico	YES	Punch hole in picture.
New York	YES	Yes – use most of the documents confiscated for the purposes of training once the case has been disposed of.
North Carolina	N/A	
North Dakota	YES	We just do it.
Ohio	YES	Practice
Oklahoma	YES	Not prohibited-In some cases, used for training.
Oregon	N/A	
Pennsylvania	YES	
Rhode Island		
South Carolina	N/A	
South Dakota	YES	After law enforcement is finished with evidence.
Tennessee	YES	The fraud unit will determine what happens to the documents and some are used for training

SECTION G: The Act requires that a State confiscate a driver's license or personal identification card if any component or security feature of the license or identification card is compromised.

TABLE G-3	Authorized to use confiscated documents for training	Notes
Jurisdiction		
Texas	YES	They do use them. Documents are reviewed and used in case, training or returned to owner if found to be valid. Reviewed by Commission. Sometimes people leave the documents at the office if they know you are checking.
Utah	YES	
Vermont	YES	Major issue to support training efforts.
Virginia	YES	Once they have been returned after investigations.
Washington	YES	May use for training or destroy
West Virginia	YES	Used for training as needed.
Wisconsin	YES	We use them for training. We call law enforcement and they use it for court action and then we usually get it back.
Wyoming	YES	No in writing but will use the documents for training purposes.
District of Columbia	YES	

Authorized to use confiscated documents for fraud training

Summary: Almost all jurisdictions that confiscate documents are authorized to use the documents for fraud training purposes. A number of jurisdictions expressed concerns that if the act requires documents to be confiscated, that they also be authorized to be used for fraud training purposes.



SECTION G: The Act requires that a State confiscate a driver's license or personal identification card if any component or security feature of the license or identification card is compromised.

TABLE G-4	
Jurisdiction	Procedure used if not authorized to confiscate compromised documents
Alabama	
Alaska	
Arizona	Keep them if they leave them when they flee the office
Arkansas	
California	They may be photocopied and the record will be marked so that the customer cannot use them in another office. If a card appears to be compromised we may require other information to substantiate the information provided. (We do not use these cards for purposes of birth/legal presence verification but only for waiving test.)
Colorado	
Connecticut	
Delaware	Give them back to the customer. Do not put their information into the system. If there is a record established, they will deny them and enter into the system that they presented fraudulent documents.
Florida	
Georgia	
Hawaii	
Idaho	
Illinois	We stop the process. We require additional identification. We do not issue if documentation is unacceptable. We put a 'fraud stop' on the driver record.
Indiana	
Iowa	
Kansas	
Kentucky	Documents are sent in to us and destroyed. Licenses can be suspended if altered. Documents are also sent to court for adjudication.
Louisiana	We don't get many. Most are returned from other states to us. If we think the person is trying to commit a fraud, (ex. Person used a counterfeit license to obtain a license in another state, and it has been returned to us by the new state) we make a copy and send a message to the other state, saying there is a problem and they should take appropriate action.
Maine	
Maryland	
Massachusetts	MA makes photos to send to the investigative unit. Give the documents back to the customer. If abandoned by the applicant they will retain them. Create a record on the system so the applicant can not go to another office.
Michigan	
Minnesota	
Mississippi	
Missouri	
Montana	Report to LE. Alert Immigration Service. Do not issue license, ask for more information (stall technique)
Nebraska	
Nevada	
New Hampshire	
New Jersey	
New Mexico	
New York	
North Carolina	LE can confiscate the documents. Can refer to LE for an arrest. Examiners are encouraged to photo copy all suspicious documents. Will be scanning the documents later this year. They are then use for investigative purposes. Then give the documents back to customer. The system is marked to prevent them from going to another office. Have a real time comment screen and they create a new record on the documents/person.
North Dakota	
Ohio	
Oklahoma	
Oregon	We contact law enforcement to deal with the person and they may or may not take the documents and person into custody.

SECTION G: The Act requires that a State confiscate a driver's license or personal identification card if any component or security feature of the license or identification card is compromised.

TABLE G-4	Procedure used if not authorized to confiscate compromised documents
Jurisdiction	
Pennsylvania	
Rhode Island	
South Carolina	Contact the internal affairs officer who contacts LE. DMV holds onto the documents until LE arrives and turns everything over to them. Do not give the documents back to the customer.
South Dakota	
Tennessee	
Texas	
Utah	
Vermont	
Virginia	
Washington	
West Virginia	
Wisconsin	
Wyoming	
District of Columbia	

Summary: Generally, LE can confiscate documents. Jurisdictions that cannot confiscate documents usually make photo copies of the documents and return them to the customer if they do not flee. They then create a record in the system to prevent the person (documents) from attempting a transaction at another DMV office.

SECTION G: The Act requires that a State confiscate a driver's license or personal identification card if any component or security feature of the license or identification card is compromised.

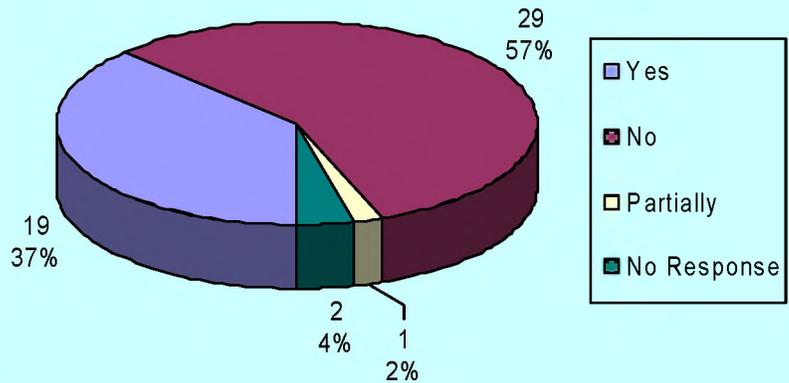
TABLE G-5	Standards and procedures are as strict as the requirements in the Act	Notes
Jurisdiction		
Alabama	YES	We exceed it. If you come into Alabama with it, you're going to jail.
Alaska	NO	
Arizona	NO	
Arkansas	YES	
California	NO	
Colorado	YES	Believe so.
Connecticut	NO	CT is authorized to confiscate but is not required to.
Delaware	NO	
Florida	NO	There is a mixed opinion in the house on the confiscation of documents. Concerns about putting people in harms way.
Georgia	NO	Examiner cannot legal confiscate out-of-state documents.
Hawaii	NO	
Idaho	YES/NO	A federal mandate would make it easier for states to enact this type of law very specifically.
Illinois	NO	
Indiana	NO	We are both too new in the job to provide information at this time.
Iowa	NO	Iowa standards are not as strict as the ACT
Kansas	NO	
Kentucky	NO	
Louisiana	NO	
Maine		
Maryland	YES	More stringent
Massachusetts	NO	
Michigan	NO	
Minnesota	NO	
Mississippi	YES	Cards are also picked up if expired. We also pick up out of state compromised DL/IDs. We also confiscate other compromised/fraudulent ID documents, e.g., Social Security cards.
Missouri	NO	
Montana	NO	
Nebraska	NO	
Nevada	YES	Close
New Hampshire	YES	
New Jersey	YES	
New Mexico	Unsure	Would have to check
New York	YES	Stricter
North Carolina	NO	
North Dakota	YES	Standard from the Act
Ohio	YES	More strict.
Oklahoma	YES	More strict
Oregon	NO	
Pennsylvania	NO	
Rhode Island		
South Carolina	NO	But the case is turned over to LE.
South Dakota	YES	
Tennessee	YES	
Texas	NO	
Utah	YES	Only for Utah documents
Vermont	YES	
Virginia	NO	Only VA documents
Washington	NO	Because we don't confiscate all documents

SECTION G: The Act requires that a State confiscate a driver's license or personal identification card if any component or security feature of the license or identification card is compromised.

TABLE G-5	Standards and procedures are as strict as the requirements in the Act	Notes
Jurisdiction		
West Virginia	YES	
Wisconsin	NO	We would like to have authority to confiscate any identification document (out of state licenses and ID cards, INS documents etc.) We are getting a law to specifically provide for this. We always call law enforcement. We stall the applicant until law enforcement arrives to confiscate.
Wyoming	NO	WY is authorized to confiscate but is not required.
District of Columbia	YES	

Standards to confiscate documents are as strict as the Act

Summary: Less than half of the jurisdictions have standards and procedures as strict as the requirements in the Act.



SECTION G: The Act requires that a State confiscate a driver’s license or personal identification card if any component or security feature of the license or identification card is compromised.

TABLE G-6 Jurisdiction	The minimum standard for confiscating driver’s license or personal identification cards that have been compromised should be:
Alabama	Every state in this country has laws on fraud. If they don’t have them, they should. I’m curious how many states don’t have forgery laws? They should use them. Every fraudulent or altered document that comes into an office should never leave it, except with law enforcement. (That goes for the bearer too)
Alaska	Framework is good. Need to have the word “compromised” defined.
Arizona	Probably what the act specifies, but have concerns for the safety of the employees who would be confiscating them.
Arkansas	What is in the Act is an acceptable minimum standard.
California	The standard must consider the safety of the field personnel in our offices.
Colorado	Standard should be clearly described in law.
Connecticut	States should be authorized but not required. Need to have reason to believe that they are fraudulent. There are situations where you would not want to jeopardize the DMV staff.
Delaware	DMV should be able to confiscate any document that is fraudulent or presented by an imposter. Procedures should be established to ensure due process.
Florida	Will be difficult to set a standard. Depends on LE being present in the DMV. Depends on the safety of the DMV staff. At a minimum the documents should be scanned.
Georgia	All documents should be confiscated.
Hawaii	We need to know for sure it is compromised or fraudulent. This is difficult for non-HI issued documents. Confiscation should apply to breeder documents and other proof of identity documents as well. There needs to be standardization of birth, death and marriage certificates. The only way to get away from fraudulent breeder documents is to have on line verification.
Idaho	-
Illinois	We need the requirement and ability to verify it when we suspect it is compromised or fraudulent. Confiscation could involve safety issues. When confiscating out of state issued cards, it is possible we could be wrong about it being compromised. We need to be able to quickly verify the legitimacy of an out of state card.
Indiana	-
Iowa	Iowa feels that they should be confiscated. If you make copies they tend to be in B&W. If you give the documents back they will still use them. Confiscation is the only way. Feel that all documents should be confiscated.
Kansas	AAMVA. We do create a record and just do not issue the card. We flag the system.
Kentucky	We support the federal Act. There is a need to clarify interstate authority (ability to confiscate out of state documents)
Louisiana	We support the Act. If another state finds a LA license that was not validly issued, that state should return it to LA for action. It should not be destroyed.
Maine	
Maryland	MD likes its system. Something similar.
Massachusetts	Only LE in MA can confiscate documents. There would need to be a federal requirement to allow the MVA to confiscate the documents. If documents are later determined to be valid and the person is the rightful holder they should be returned to the customer.
Michigan	We agree with the Act. It may be difficult. For example, for people who gave us a bad address and we cancel it, how do we reach them to retrieve the license? We agree that safety of personnel and customers is important and confiscation should be done with common sense. How you do the confiscation needs to be talked about. We agree with the concept of getting cards out of circulation but details need to be discussed. Question: do we have authority to confiscate breeder documents issued by another agency? Same thing applies to out of state issued licenses or cards. This question needs to be answered.
Minnesota	We might support the Act if there is some kind of due process involved. Would have to get it passed by our legislature. The Legislature feels they have their own authority and just because the feds tell them we have to do something, doesn’t mean it will get done or get done quickly. We think our agents would vigorously oppose a requirement to confiscate cards.
Mississippi	States should have to confiscate all compromised documents and charge the person Criminally.
Missouri	We support the requirements of the Act. Our concern is the safety of staff and customers in creating a hostile environment.
Montana	Not confiscating of documents by civilians. Like to see procedures that will help what to do short of confiscating documents. Importance of annotation of system and not of document. System checks should provide history/record on applicant if they have used improper documents.

SECTION G: The Act requires that a State confiscate a driver’s license or personal identification card if any component or security feature of the license or identification card is compromised.

TABLE G-6 Jurisdiction	The minimum standard for confiscating driver’s license or personal identification cards that have been compromised should be:
Nebraska	Legal authority for DMV to confiscate documents and make it a DLA requirement. Stiffer penalties for those presenting or knowingly accepting fraudulent documents. We should also be confiscating fraudulent breeder documents as well as other state issued DL and ID.
Nevada	Framework is sufficient
New Hampshire	Agree with the ACT.
New Jersey	At minimum there should be a process to confiscate and destroy. If the card has been compromised it should be forwarded back to the state for prosecution.
New Mexico	Use AAMVA’s suggestions.
New York	The term minimum should be used in the development of the language to allow a jurisdiction to exceed the minimum requirements established.
North Carolina	Everybody should be doing the same thing.
North Dakota	-
Ohio	Confiscation when compromised should be requirement. With full procedures /legal sufficiency behind.
Oklahoma	Any tampering. It should be a standard that all states confiscate documents that are fraudulent.
Oregon	We suggest the minimum standard for confiscating driver’s license or personal identification cards be for circumstances involving: false application; attempted ID fraud/theft. There should be at minimum: “probable cause” to believe; second opinion within office; standards for timely reviews/decisions; due process for contesting confiscation; notice of how to recover documents; etc.
Pennsylvania	Leave it up to the state.
Rhode Island	
South Carolina	The minimum standard should be to hold onto the documents and turn them over to LE to make a determination and pursue any action.
South Dakota	They should be confiscated.
Tennessee	The new TN standard
Texas	The standards should be consistent with all states and should be in law.
Utah	Framework/DLA
Vermont	Should be confiscated on site and referred to LE.
Virginia	Each jurisdiction should be authorized to confiscate its own documents if they have been compromised. If a jurisdiction is authorized to confiscate documents, it should be authorized to use those confiscated documents in Fraudulent Document Recognition training.
Washington	Concern with safety of staff if we are required to confiscate all docs from customers as state in fed. Law
West Virginia	All documents should be confiscated that are fraudulent or held by imposters.
Wisconsin	We want to get these documents out of circulation. We would like to see all identity documents confiscated, not just DL/ID cards.
Wyoming	Documents should be confiscated, however, due process needs to be considered and DMV needs to be sure that the document is fraudulent.
District of Columbia	Agree with the Act

Summary: Jurisdictions generally support the concept of confiscating documents. However, states feel they should be authorized, but not required, by federal law to confiscate documents. There are circumstances in which the DMV employees would be at risk if they are required to confiscate documents. Due process must also be considered for the applicant. Although the documents or the customer may be suspicious, this does not indicate the person is guilty of committing fraud.

SECTION G: The Act requires that a State confiscate a driver’s license or personal identification card if any component or security feature of the license or identification card is compromised.

TABLE G-7 Jurisdiction	Comments to assist in the development of minimum standards for the confiscation of compromised documents
Alabama	-
Alaska	Framework is good. Need to have the word “compromised” defined.
Arizona	Probably what the act specifies, but have concerns for the safety of the employees who would be confiscating them.
Arkansas	-
California	The standard must consider the safety of the field personnel in our offices.
Colorado	-
Connecticut	Confiscated documents should be authorized to be used for training.
Delaware	Need to provide the ability to electronic check against databases and be required to image the source documents. If we used biometric indicators it would dramatically reduce fraud.
Florida	Any mandate by DOT that requires the confiscation of documents needs to be evaluated in regards to the safety of the DMV staff. Confiscated documents should be authorized to use for training purposes.
Georgia	Confiscating the document is not enough. There should be prosecution of the individuals. Because GA requires finger prints, they process them even if they are passing off bad documents and then they have them in the system. . Once they are in the system the documents cannot be used again. . If the individual then runs, the fingerprints can then be used to find out who they really are.
Hawaii	-
Idaho	-
Illinois	-
Indiana	-
Iowa	Confiscation of documents should be added to the AAMVA DL/ID Security Framework. The U.S. DOT should look beyond the DL/ID documents to include all identification documents.
Kansas	Have concern for personnel if we are required to confiscate all documents. We tell them now to consider their personal safety first.
Kentucky	-
Louisiana	State to state verification of status should b a part of the minimum standards.
Maine	
Maryland	-
Massachusetts	Need to take into account the safety of MVA staff. States should be authorized to confiscate but not required to. Depends on the relation with LE.
Michigan	We agree with the Act. It may be difficult. For example, for people who gave us a bad address and we cancel it, how do we reach them to retrieve the license? We agree that safety of personnel and customers is important and confiscation should be done with common sense. How you do the confiscation needs to be talked about. We agree with the concept of getting cards out of circulation but details need to be discussed. Question: do we have authority to confiscate breeder documents issued by another agency? Same thing applies to out of state issued licenses or cards. This question needs to be answered.
Minnesota	We might support the Act if there is some kind of due process involved. Would have to get it passed by our legislature. The Legislature feels they have their own authority and just because the feds tell them we have to do something, doesn’t mean it will get done or get done quickly. We think our agents would vigorously oppose a requirement to confiscate cards.
Mississippi	Go to www. FAKEIDGURU.com on line to get an idea what is going on. AAMVA needs to start working with the federal government to make this stuff go away.
Missouri	-
Montana	-
Nebraska	-
Nevada	-
New Hampshire	States should be authorized to use the confiscated documents for training. Privacy needs to be considered as well. Need to define a privacy statement for these documents.
New Jersey	Confiscated documents should be authorized for training.
New Mexico	-
New York	-
North Carolina	DMV need to have easy to understand procedures so not to violate due process for the customers. Regulations need to be clear on the definitions of compromised. Have issues with the safety of the examiners.
North Dakota	-

SECTION G: The Act requires that a State confiscate a driver's license or personal identification card if any component or security feature of the license or identification card is compromised.

TABLE G-7	Comments to assist in the development of minimum standards for the confiscation of compromised documents
Jurisdiction	
Ohio	-
Oklahoma	-
Oregon	-
Pennsylvania	PA has no LE presence in the DMV. Concerned about the safety of the DMV staff.
Rhode Island	
South Carolina	DOT should reconsider having counter clerks confiscate documents placing them in an unsafe position. This is the role of LE. Need to consider the liability that will be placed on the DMV and the state.
South Dakota	-
Tennessee	Would like for confiscated documents to be authorized for training.
Texas	Need standard or law to enable states to do this.
Utah	Must be sensitive to personnel safety when confiscating documents
Vermont	Beyond confiscation refer them to investigation. Confiscated document should be authorized to be used for training purposes.
Virginia	-
Washington	-
West Virginia	States should be given guidelines and direction on taking documents that are fraudulent or held by an imposter. Confiscated documents should be authorized to be used for training.
Wisconsin	-
Wyoming	There are risks for the DMV to confiscate documents and states will need to be informed on the formats of the various documents to make a better determination on confiscation.
District of Columbia	-

Summary: See comments above.

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Section H

Summary – DL/ID Reform

SECTION H: Summary – DL/ID Reform

TABLE H-1	Have determined the costs associated with the implementation of the AAMVA Security Framework	Notes	Current costs for issuing DLs and IDs (prior to the AAMVA DL/ID Security Framework Requirements and Recommendations)
Jurisdiction			
Alabama	NO		Not sure
Alaska	NO	Approximately \$2.19 a card. Don't know full product cost	\$2.19 per card
Arizona	YES	\$2,851,000 but does not include all aspects in DLA/Framework-do not know total product cost	\$1.72 per card
Arkansas	NO	We can't realistically get that for you because we are part of the revenue agency of the state including motor vehicles and driver licenses. Therefore we cannot break out current costs.	Not Sure
California	NO	Implementing 125 character name field will require significant programming and costs as our current databases cannot handle the volume. Cost of dl/id card is \$.69. Total product cost if application is processed in a field office is around \$16 if no drive test is required.	\$0.69 per card
Colorado	YES/NO	Cost only involve changing card to vertical format and capturing 125 character name-Haven't determined system costs but can't accommodate name field length in current system-Would cost \$840,000 for scanners	\$2.607 per card
Connecticut	NO		Not sure
Delaware	NO	Have been working to determine costs. The two person verification system is too expensive. If you implement other systems verification with a random audit this should suffice for a two person check.	-
Florida	NO	Will provide	
Georgia	NO		Not Sure
Hawaii	NO	Counties fund each island (Molokai, Maui and Lanai are all part of Maui County). The State maintains the shared mainframe system and coordinates activities.	Not Sure
Idaho	NO		\$2.50 per card
Illinois	NO	No, we cannot find any full cost assessment information for current costs.	NO
Indiana	NO		N/A
Iowa	YES	1.26 Million – with a reoccurring cost each year of \$85,000 for the common OVD. The system redesign attributed to the Framework enhance contributes to \$650,000 out of \$10M for the total system redesign. Cost categories include: pen tablets for drive tests, internal review processes, costs for training, facility modifications, additional programming changes that DOT staff would have to make, 1 st year costs for the OVD and FDR training costs.	
Kansas	NO	Don't have a total product cost.	\$2.08 per card
Kentucky	NO	We cannot give present costs.	NO
Louisiana	NO	\$1.64 per card currently is paid to the vendor. We do not have total current costs available for issuing DLs and IDs.	\$1.64 per card
Maine			
Maryland	YES	Length of stay system \$450,000. Increased staff/system storage still adds cost. Initial 40 million and another 20 million in enhancements (includes point of sale system). Sequel server IBM mainframe (programming from 2 directions –internal and vendor).	0.87 cents for consumables and prints on.
Massachusetts	YES	Have a rough estimate that it would be no less than \$10M. This is a very conservative estimate and will depend on the regulations that are established. Current card costs are \$1.83.	\$1.83 per card
Michigan	NO	We cannot provide current cost information at this moment. We can give some information we have on this later if we come up with it. If we do, we will provide it to AAMVA.	Not sure
Minnesota	NO		NO
Mississippi	NO		NO

SECTION H: Summary – DL/ID Reform

TABLE H-1	Have determined the costs associated with the implementation of the AAMVA Security Framework	Notes	Current costs for issuing DLs and IDs (prior to the AAMVA DL/ID Security Framework Requirements and Recommendations)
Jurisdiction			
Missouri	NO	It is difficult to answer the supplemental part of the question. It needs further definition. Does it include staff costs for example?	Not sure
Montana	NO		\$3.15 per card
Nebraska	NO	We need to see a final plan to do a cost assessment due to resources needed to compile one. We don't know current costs.	NO
Nevada	NO	\$2/card. Product cost is around \$20.	\$2 per card
New Hampshire	NO		
New Jersey	NO		Not sure
New Mexico	NO		
New York	NO	Have not done a thorough review. Know that there are elements that will be costly. Did a comprehensive IT analysis. Would take 2-3 years to implement. Costs are required to continue upgrading the system. Currently \$225M for full operating budget. Could not determine overall.	Not sure
North Carolina	NO	Current DL/ID card costs \$1.05 and estimate that the new card will cost \$1.80. This is a significant increase. Additional costs will be \$1.9M just for the document. NC issue about 2.5M documents each year.	\$1.05 per card
North Dakota	YES	Based on what we understand the requirements to be.	Implementation total: \$1,577,640.00; on-going annual maintenance: \$518,840.00. Most of that is in the cost of the card issuance and maintenance of the contract
Ohio	NO	When possible additional information will be provided.	
Oklahoma	NO		\$2.143 per card
Oregon	NO		NO
Pennsylvania	NO		Not sure
Rhode Island			
South Carolina	NO		Don't know
South Dakota	NO	Enlarging # of name characters to 125 will be a major impact.	
Tennessee	NO	TN pay \$1.41 per card currently and issues about 1.41M cards a year.	\$1.41 per card
Texas	YES	\$12 million not including common OVD and DRIVERs	\$0.68 per card- \$9.00 product cost
Utah	NO	2.22 per card. Don't have product cost	\$2.22 per card
Vermont	NO		Not sure
Virginia	NO	Does not include having to verify all documents. Done at the early part of the process.	Not sure
Washington	NO	Not a formal costing-an informal costing of the HR bill if DRIVERs is included was around 26 million-\$13-14 product cost.	\$1.49 per card
West Virginia	NO		Not sure
Wisconsin	YES	We will send this to AAMVA	\$1.06 beginning 11/05
Wyoming	NO		Current card costs are \$1.34 each
District of Columbia	NO		\$3.11 per card

Summary: See notes above.

SECTION H: Summary – DL/ID Reform

TABLE H-2 Jurisdiction	Overall comments to assist with the development of minimum standards as the related to the Act
Alabama	-
Alaska	-
Arizona	-
Arkansas	-
California	Additional programming may be required. It is our understanding that the DLA it working group is creating a report based on an information technology evaluation of the DLA requirements. Once we receive the report we will review it to ensure compliance.
Colorado	None other than what was already mentioned. Certainly will need funding to enhance database for name capture-cannot do this in 2 years.
Connecticut	Need to look at requiring legal presence. Should be resolved at a national level. There should be a biometric and CT would like to see facial recognition as the biometric. Costs are going to be an issue and funding should be made available.
Delaware	Need systems, need DRIVeRS, need funding. For the DLA to work we need an all drivers system.
Florida	Need to have a standard background check for the DL examiner (employees). Need to have additional funding to help with staff fraud training.
Georgia	Funding must be provided.
Hawaii	-
Idaho	-
Illinois	Costs will be significant. Organizational capacity is an issue as well as costs. You can't always buy a solution to a problem.
Indiana	-
Iowa	Iowa plans to fully implement the AAMVA DL/ID Security Framework. The price of new DL and ID will not be higher for the customer.
Kansas	-
Kentucky	With our organizational structure, we have tremendous challenges. We need to modernize and make it more accountable. We have many good law and programs in place but it comes down to the over the counter process using people who are not accountable to you, that makes it a real 'wild card' out there.
Louisiana	-
Maine	
Maryland	-
Massachusetts	Need systems and funding. Need to have easily achievable requirements. Complicated/complex mandates should be optional.
Michigan	-
Minnesota	-
Mississippi	We need money to do what is being required. The driver license was never meant to become what it has (proof of ID). We're still using old technology trying to make a square peg fit into round hole.
Missouri	-
Montana	
Nebraska	-
Nevada	-
New Hampshire	DOT needs to consider funding and time to implement minimum requirements. Training, customer service and privacy all need to be considered. Need recommended job description and tasks for the people that will be required to assist in meeting the set standards. DOT needs to think about what they are asking the states to do and needs to consider the restrictions given the staff capabilities. There will be a large education process for the state legislatures. DOT should request AAMVA to assist with the education of state legislatures.
New Jersey	
New Mexico	-
New York	New York supports 418.
North Carolina	Need to have on-line verification systems and funding. Need to support fraud training. Need to have samples for fraud training.
North Dakota	-
Ohio	
Oklahoma	-
Oregon	-

SECTION H: Summary – DL/ID Reform

TABLE H-2 Jurisdiction	Overall comments to assist with the development of minimum standards as the related to the Act
Pennsylvania	Time and Money
Rhode Island	
South Carolina	-
South Dakota	-
Tennessee	Need to have funding to meet the minimum regulations that will be established. Need to establish and improve current on-line verification system to verify foundation documents issued.
Texas	-
Utah	-
Vermont	-
Virginia	VA is going to central issuance and are going to redesign the system and the document. This gives VA the opportunity to make changes to meet the AAMVA / DLA standards.
Washington	-
West Virginia	Need SSA and INS to be more cooperative. Hopefully under DHS this could improve. Need to improve all source documents and the issuance processes to improve the DL/ID issuance process. Our process can only be as strong as the weakest link and there are numerous weak links in the issuance of other types of source documents. The national security of DL/ID issuance is being place on DMV clerks who don't make much money. States need more support and secure information from the federal governments and other agencies. States need help from the federal agencies.
Wisconsin	-
Wyoming	Need to have appropriate funding to support the requirements. Need to have systems for on-line verification.
District of Columbia	Need funding to support the minimum requirements developed.

Summary: The jurisdictions urge DOT to consider funding to implement the minimum standards developed as a result of the Act. Additionally, reasonable time allocations to implement the new standards will need to be addressed. See additional notes above.