

The Real ID Act

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

A Report by:

The American Association of
Motor Vehicle Administrators

August 2005



American Association of
Motor Vehicle Administrators

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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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Jurisdictional Impact Analysis Driver's License and Personal Identification Card Provisions in the Emergence Supplemental Appropriations Act for Defense, the Global War on Terror and Tsunami Relief, 2005, H.R. 1268 (hereafter referred to as Real ID Act)

Introduction

Each jurisdiction is unique in the way they go about the business of issuing DL/ID cards. To provide a summary of issues involving implementation of the Real ID Act requirements in each jurisdiction's DL/ID card issuing process will require generalization of issues. Establishing the impact that specific requirements may have on individual jurisdictions is not an exact science because of the uniqueness of each situation and the absence of specificity that will eventually be provided through regulations. However, this document is an attempt to provide a snap shot look at the various requirements and the potential impact they may have on individual jurisdictions, from their perspective at the current time. As the regulations are developed and more detailed information about each requirement is known the impacts will change. This document therefore is dynamic.

Because the Real ID Act is US Federal Legislation, the requirements are geared to the US jurisdictions. However, Canadian jurisdictions were asked to provide their impact assessments of the requirements. Please note that some of the requirements are not applicable to the Canadian jurisdictions. These were excluded from their responses.

Surveys were sent to all US (54) and Canadian jurisdictions (13). As of the date of preparation of this document, 50 of the 54 US and 9 of the 13 Canadian jurisdictions had responded. The result is an overall 88% response rate.

Content Description

The first section of this document provides a summary of the impacts broken down by requirement as currently found in the Real ID Act.

The second section provides the analysis results by requirement for each jurisdiction.

Methodology

All jurisdictions were asked to perform an analysis of the impact the requirements contained in the Real ID Act pose on them. A template was provided to all jurisdictions in an attempt to keep the information captured as uniform as possible. All returned impact analyses were reviewed. Each jurisdictional answer was assessed an impact according to defined impact categories. The impact categories are:

- None
- Low
- Medium
- High Impact
- Unknown Impact

In some cases no responses were provided, they are identified as NO RESPONSE. Where there are blanks, the responses were not received by the date of preparation.

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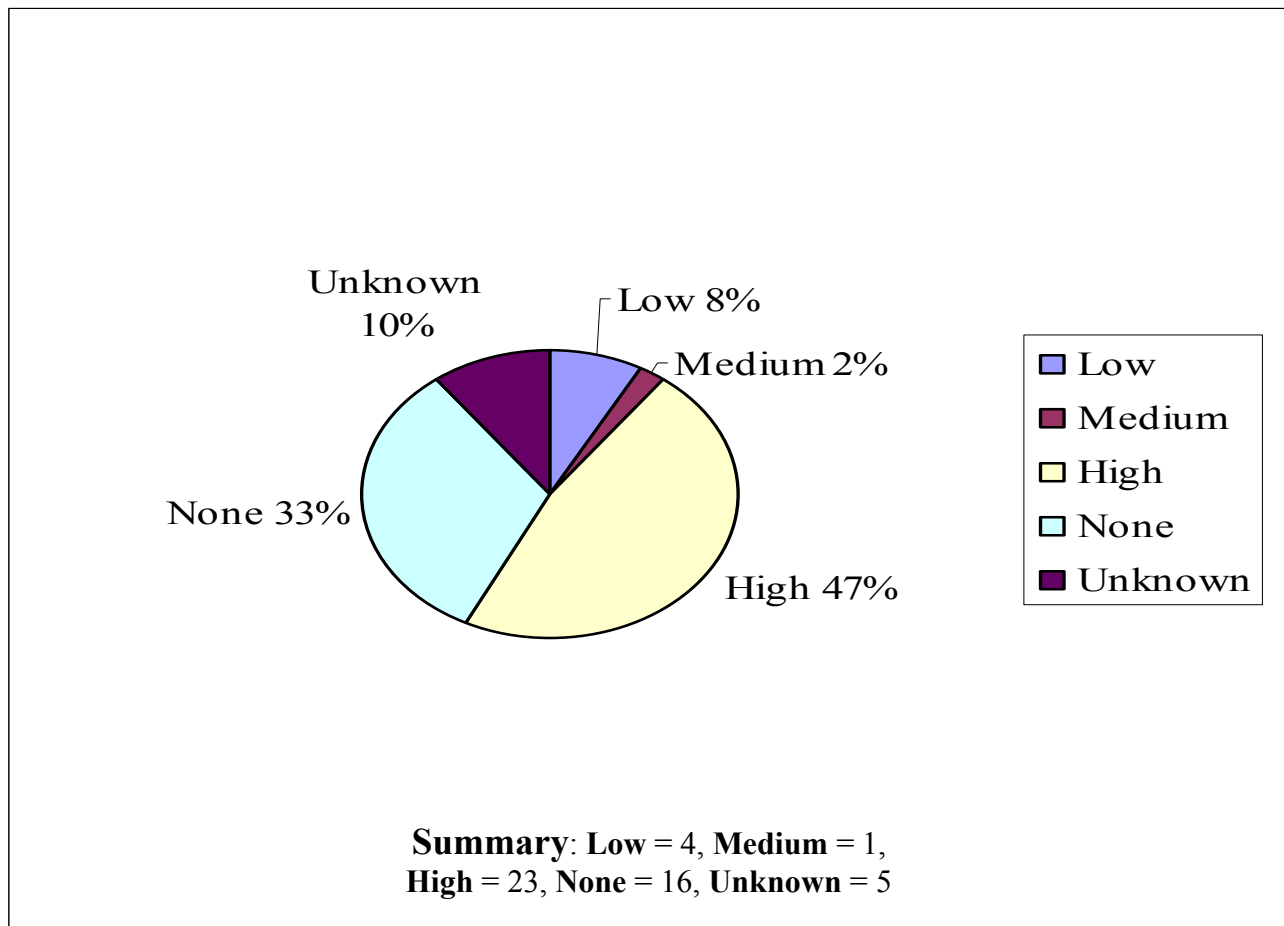
REQUIREMENT A.

The DL/ID card issued to a person must include full legal name.

Harmonized introduction of full legal name will pose a major hurdle for 51% of jurisdictions. Most jurisdictions have not been capturing full legal name or have done it in different ways causing inconsistent practices. Studies have shown that for full legal name to be captured at least 125 characters will be needed. Introducing a data field of such size into each jurisdiction's system will be very costly.

In addition procedures for capturing names will have to change. This will require training of personnel. Based on what acceptable verifiable "breeder" documents are contained in the rules we have to determine how full legal name can be captured because there are only few documents currently being issued that can provide full legal name (with certainty).

Common law jurisdictions may also have problems with the legal name requirement (clarification of what "legal" means)



Low = Requires some policy changes

Medium = Policy changes, computer programming

None = Already in place

High = Major reprogramming, training, legislation/major costs

Unknown = Need more information to determine impact

N/A = Not applicable

No Response = No comments provided on this requirement

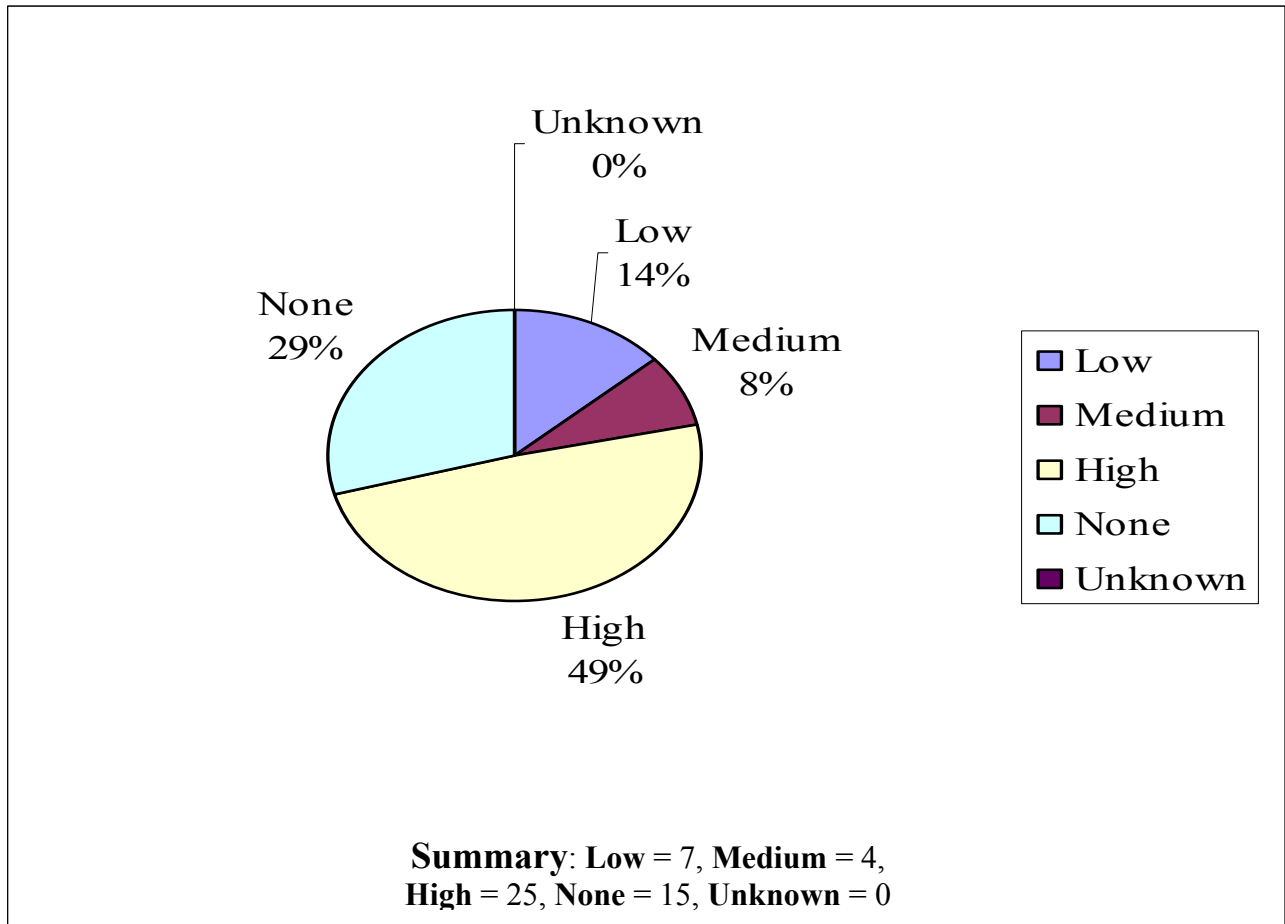
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REQUIREMENT B.

Have following data elements/features on the document such as: legal name, DOB, etc.

57% of respondents indicated that the requirement will have medium to high impact for them. The main issue for most jurisdictions is the person's address of principal residence. This issue goes beyond the information being captured on the document; it also touches on capturing and verification.

Examples of groups that will have problems are: homeless people, RV owners whose vehicle is their domicile.



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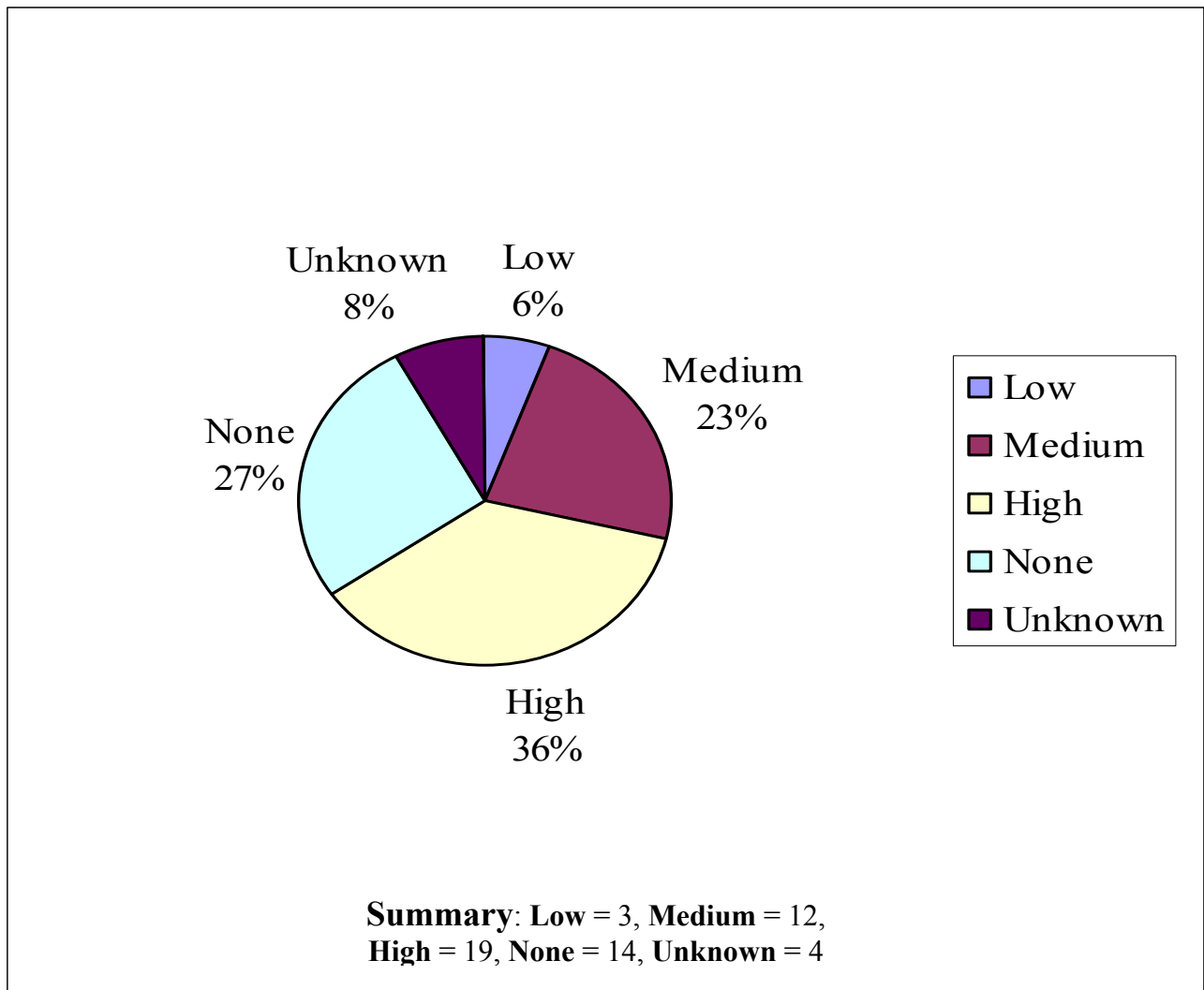
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REQUIREMENT C.

Temporary DL/ID cards will be valid only during the period of time of the applicant's authorized stay in the U.S.

The majority of jurisdictions do not tie end of stay to the expiration date of DL/ID card. Changing this will have an IT impact, as it requires changes in system specifications, procedures and training for frontline personnel. The complexity of the different classifications of immigration status and documents involved results in numerous of "gray" areas subject to interpretation.



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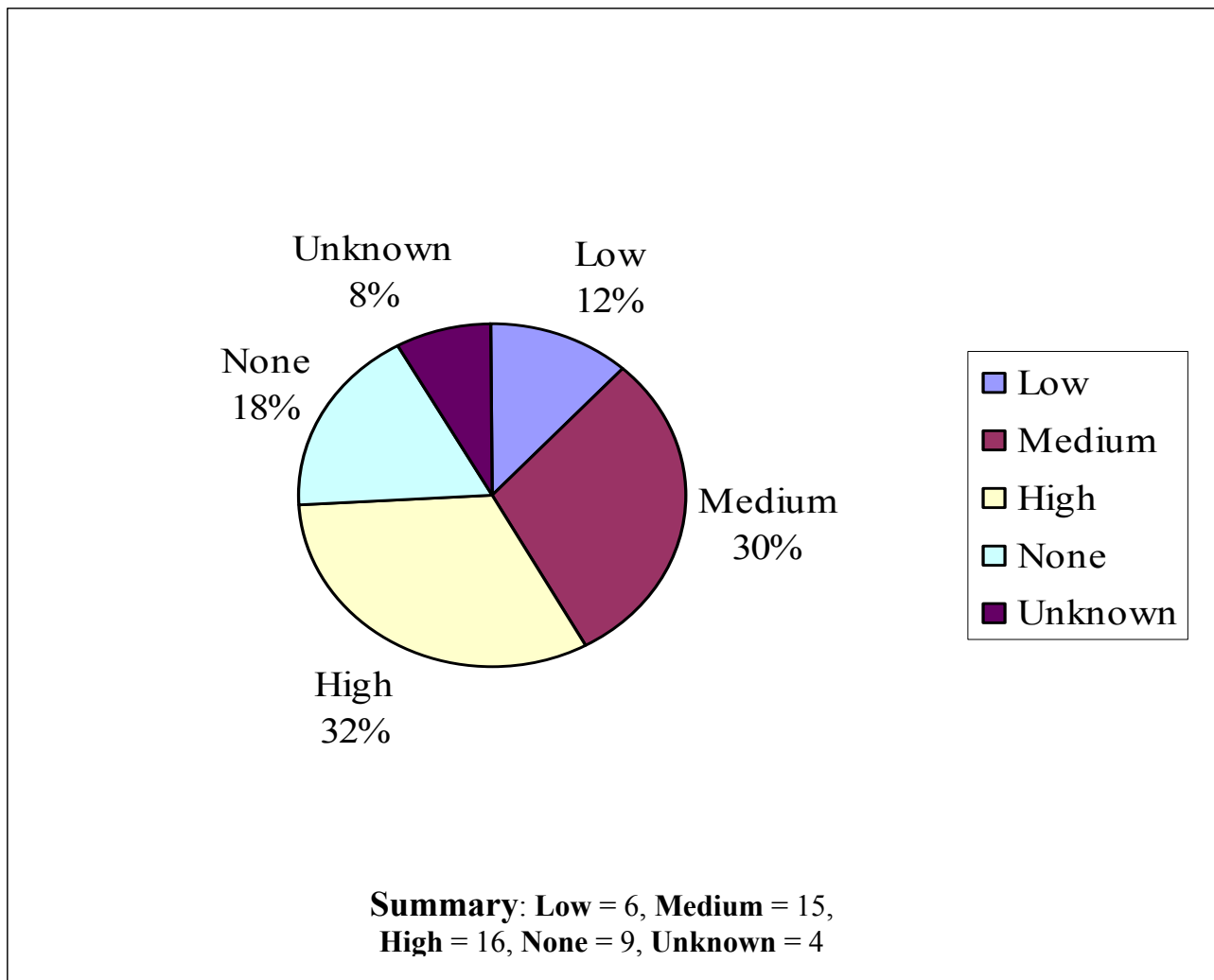
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REQUIREMENT D.

Amending card design to indicate this “different than usual” expiration date.

The impact of this requirement is dependent on the overall requirements associated with new card design(s). Most jurisdictions have a contract already in place to manufacture documents resulting in an expense to change the contract. We will not have a full understanding of the impact until the rules are promulgated. At this point, 60% of jurisdictions rank this requirement as having medium to high impact.



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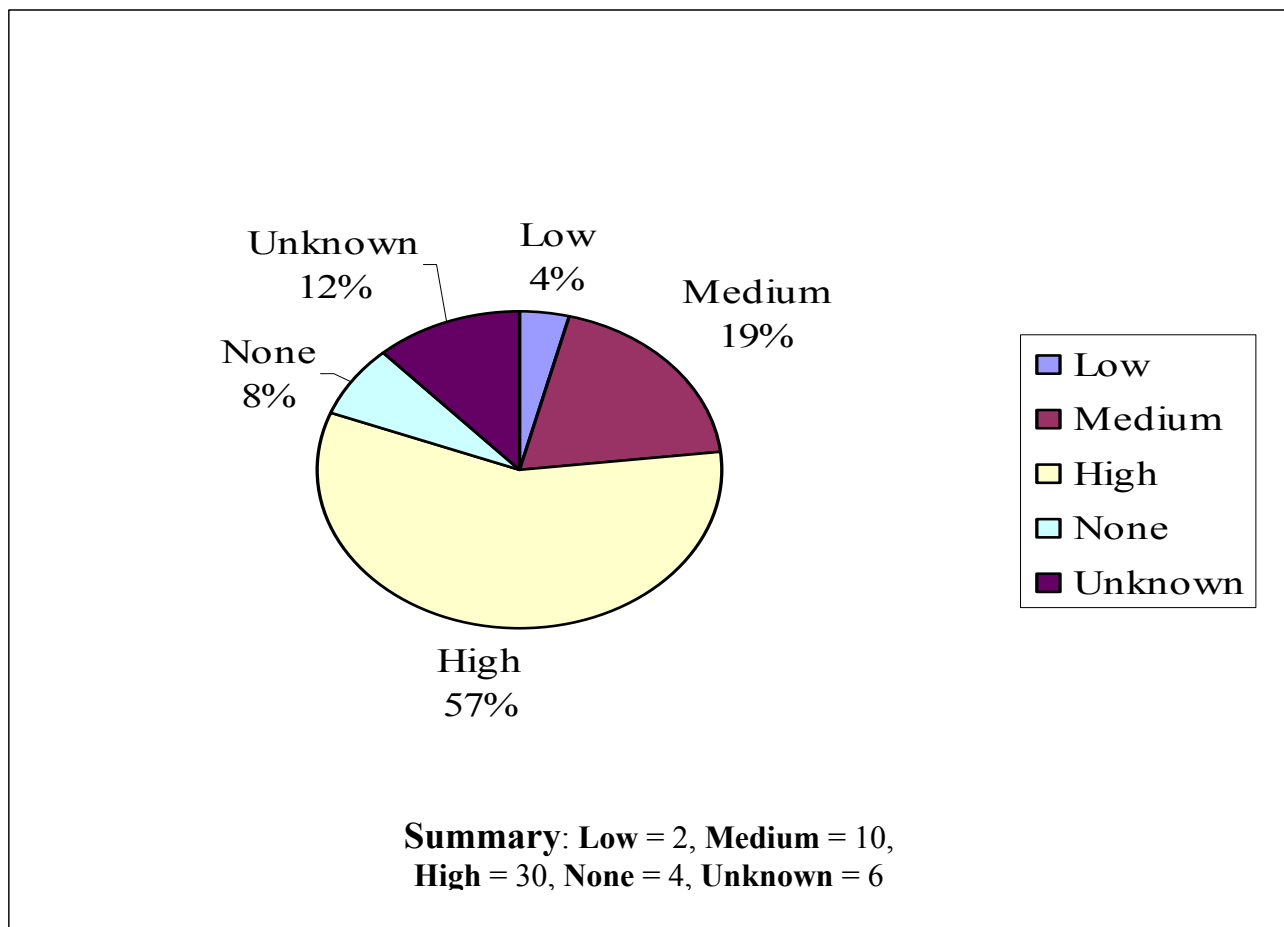
REQUIREMENT E.

Jurisdictions must verify with the issuing agency the issuance, validity and completeness of each source (or “breeder”) documents presented to verify identity.

Many issues were identified with this requirement. There are a few programs in place to provide verification at source (e.g. SSOLV, SAVE, DEERS). Until its known what acceptable verifiable “breeder” documents are contained in the rules, we would not know the full impact. At this point however, 76% of the jurisdictions indicated a medium to high impact of this requirement.

Furthermore the implementation of this requirement has a number of unresolved issues, such as the cost of gaining access, quality of information available at the source and systems in place.

Creation of single access (gateway) to all verification systems for all jurisdictions will greatly reduce cost for and increase ease of implementation (e.g., most front line personnel do not have Internet access, creating a problem for the use of web-based systems).



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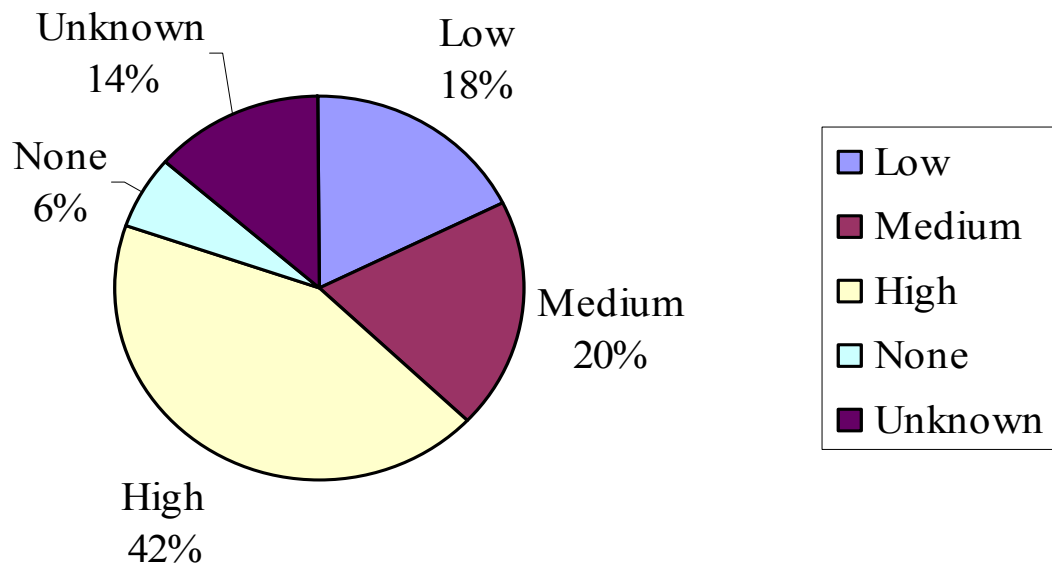
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REQUIREMENT F.

Jurisdictions must develop an access capability to SAVE.

For jurisdictions that already have access capability to the SAVE program the impact will be low. However, the remaining jurisdictions currently do not have or are in the process of gaining access to SAVE. 60% view this requirement as having medium to high impact. Until all of the requirements for access, usage and cost the complete impact should uncertain.



**Summary: Low = 9, Medium = 10,
High = 22, None = 3, Unknown = 7**

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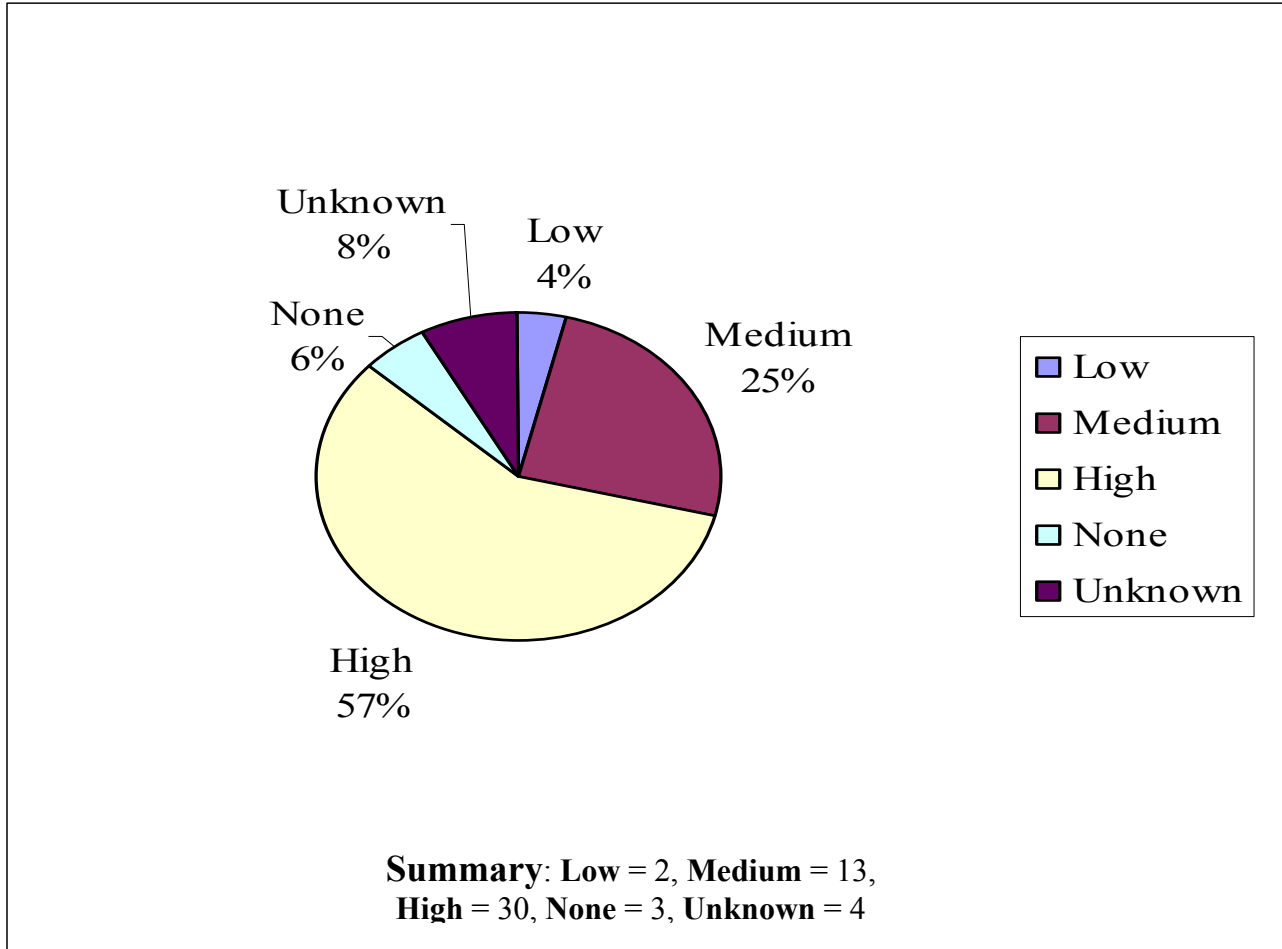
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REQUIREMENT G.

Jurisdictions must employ technology to capture and retain digital images of these source documents in electronic storage in a transferable format.

The majority of jurisdictions currently do not have this procedure in place nor do they have the equipment and systems in place to capture and retain source documents. 82% of jurisdictions indicate medium to high impact of this requirement.



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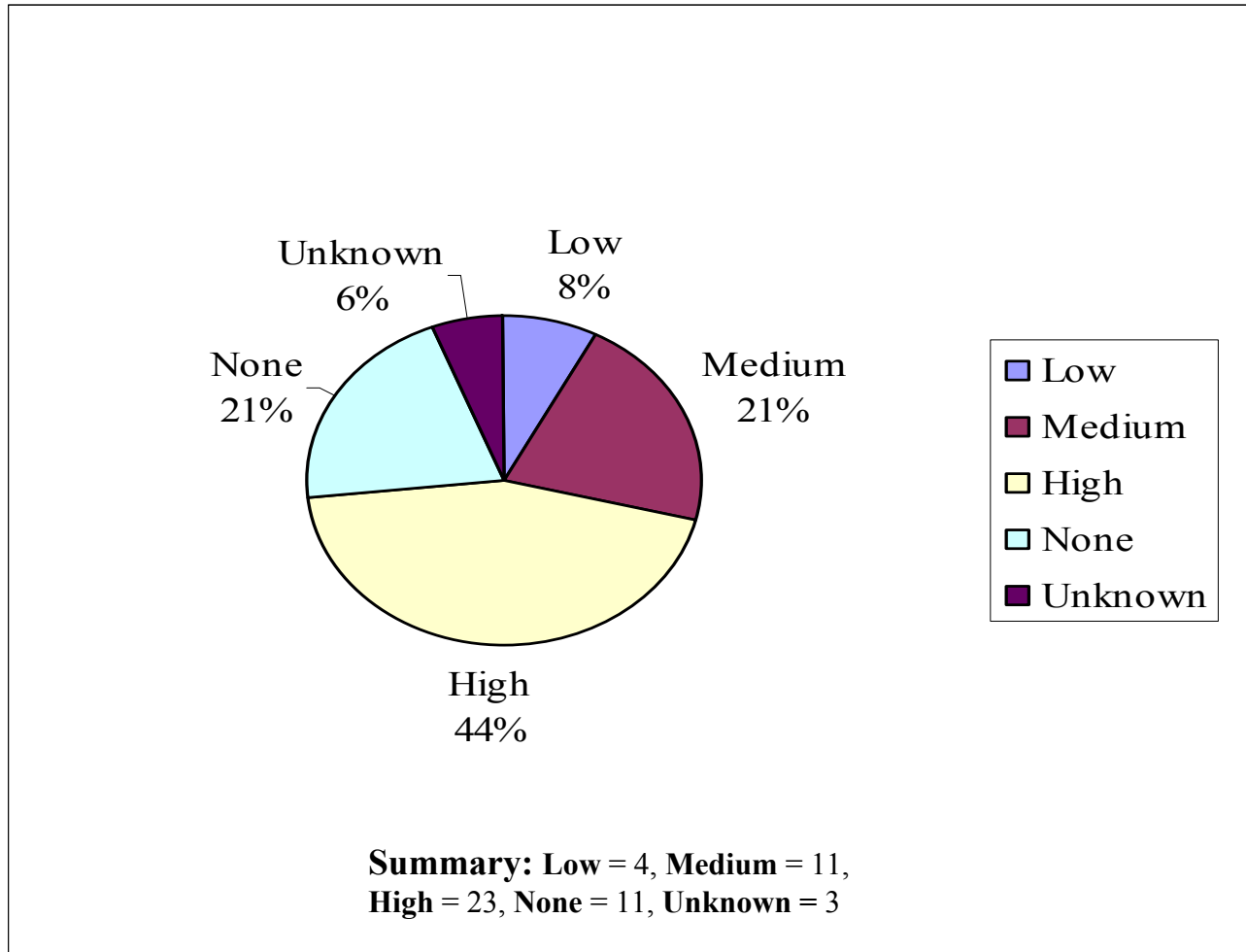
No Response = No comments provided on this requirement

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REQUIREMENT H.

Jurisdictions must retain paper or images of source documents for a minimum period of time.

Most jurisdictions indicated that they currently do not have a process in place nor do they have the equipment to meet this requirement. Integrating this requirement in to the jurisdictions' systems will be very costly especially for those jurisdictions that issue their documents over the counter. 66% indicated that the impact will be medium to high.



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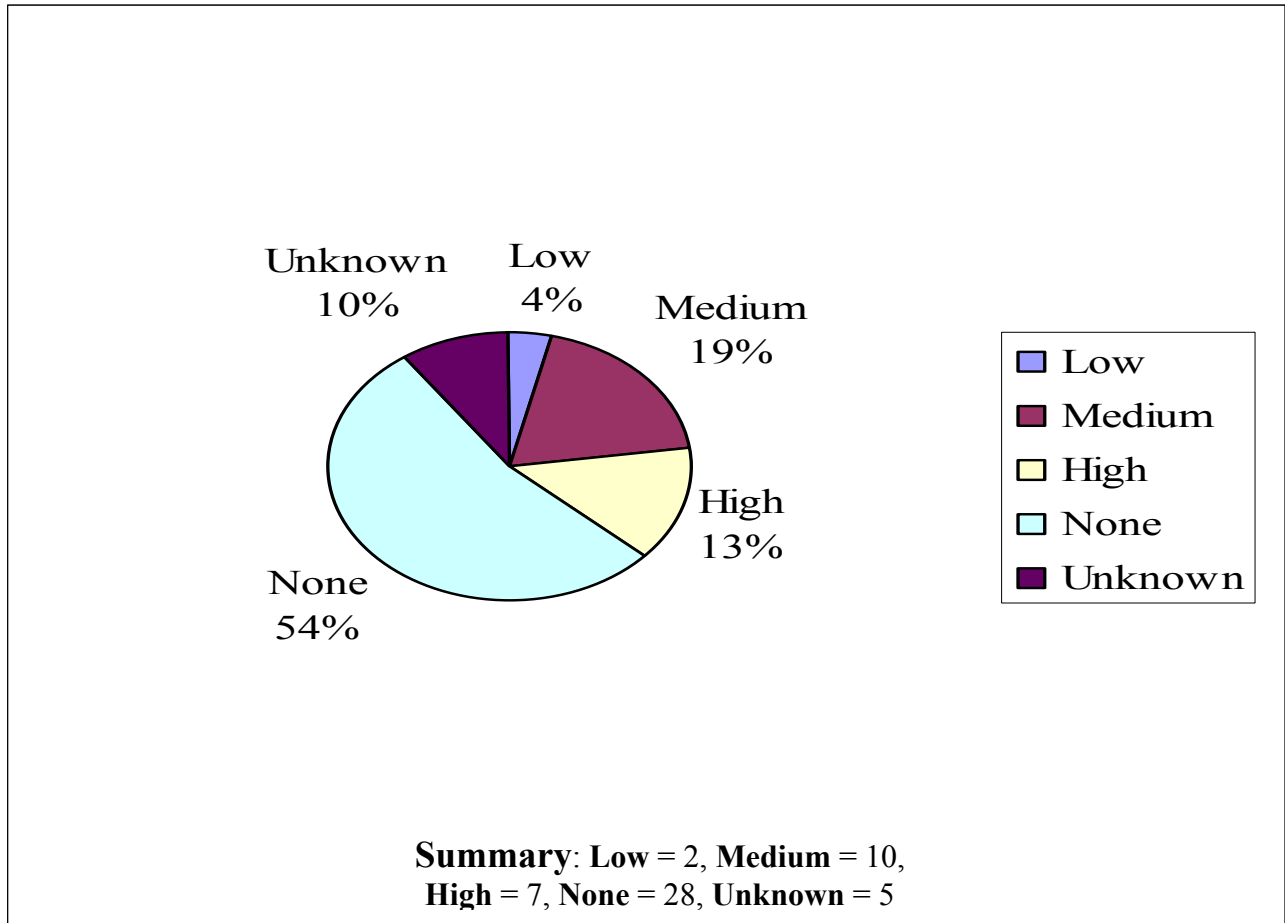
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REQUIREMENT I.

Each person applying for a DL/ID card must be subjected to mandatory facial image capture.

All jurisdictions have a system that allows for digital facial image capturing. A few jurisdictions have exemptions (e.g. religious, military personnel overseas), that may cause problems with implementation of this requirement. There have been several lawsuits in the recent past on this issue. These need to be taken into consideration for all requirements that may have a negative effect on them. Overall, 60% of jurisdictions had none – low impact in meeting the requirement.



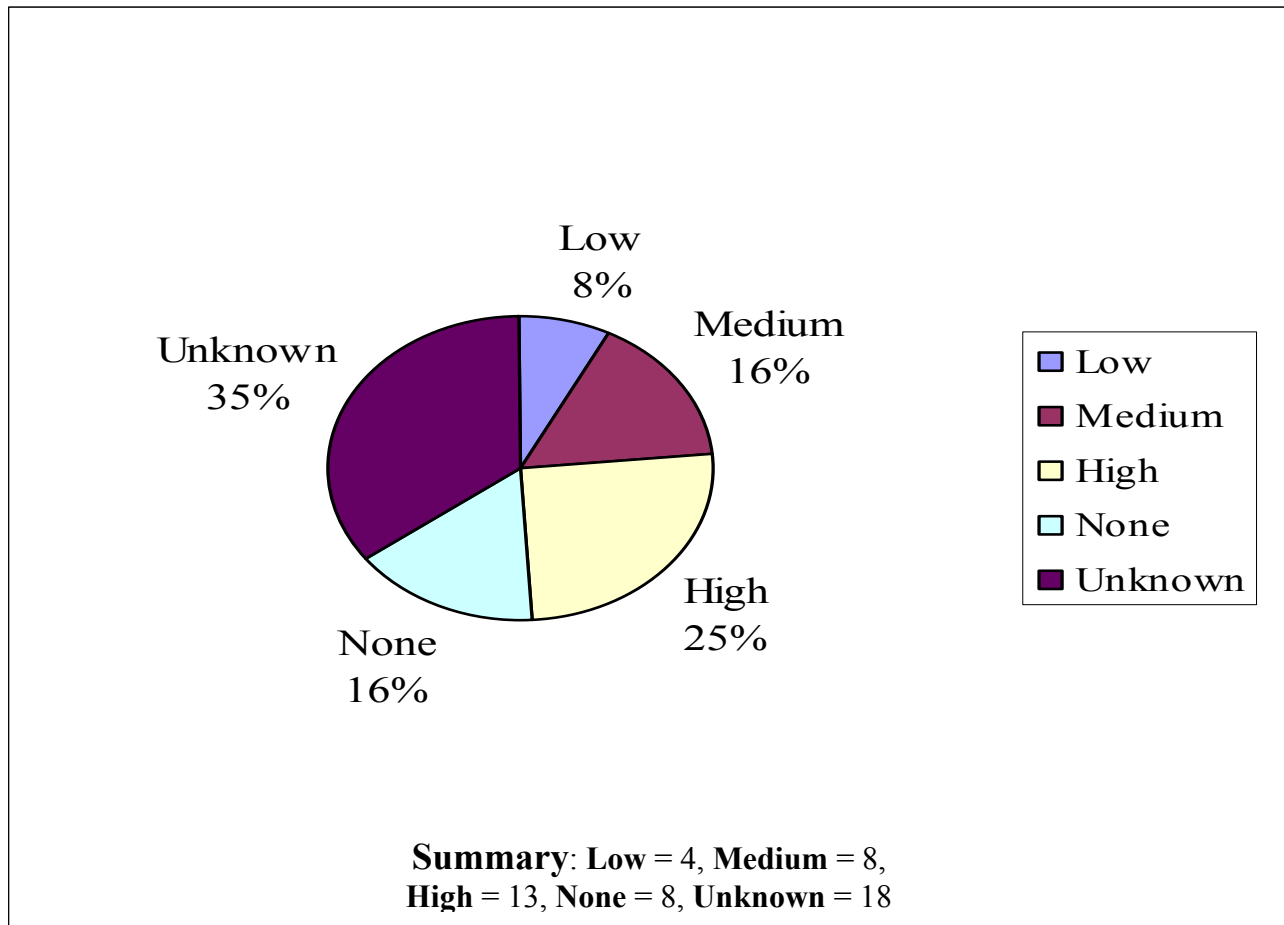
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REQUIREMENT J.

Jurisdictions must establish an effective procedure to confirm or verify a renewing applicant's information.

The jurisdictions posed a number of concerns responding to this issue. What constitutes an effective procedure? Do all existing license and ID card holders have to be enrolled? Is renewal by internet/mail allowed? There is a possible impact dependent on the answers to the questions posed. As a result, the implications are generally balanced between none – unknown and medium to high.



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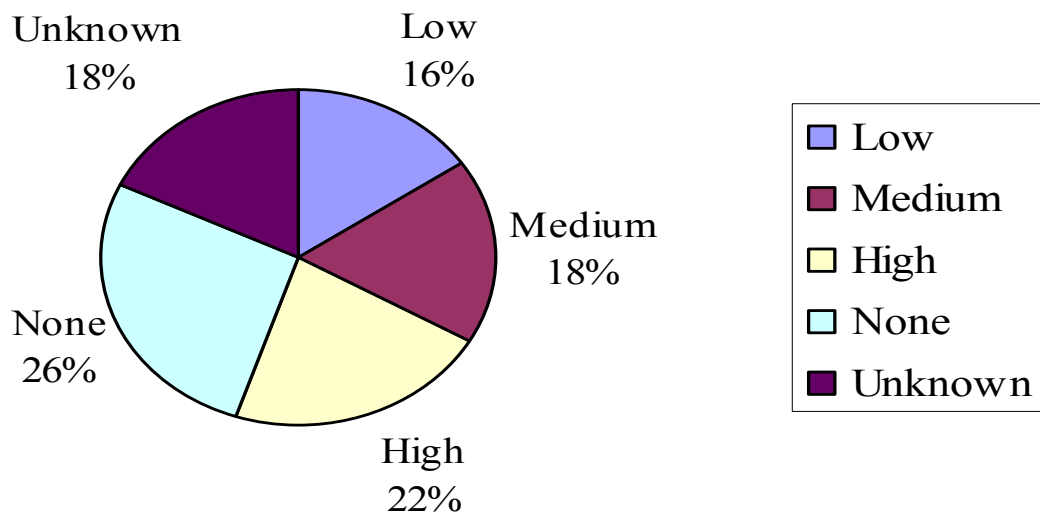
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REQUIREMENT K.

Jurisdictions must confirm SSNs presented by applicants with the SSA. In the event a SSN is already registered to or associated with another person, the jurisdiction is responsible for resolving the discrepancy and taking appropriate action.

This requirement may have a medium to high impact for 36% jurisdictions. Concerns were posed with respect to how and who would be responsible for and involved in solving the problem. As long as only one side (the MVA and not the SSA) is made responsible for solving the problem the impact will be great on the jurisdictions and success is not guaranteed.

Having electronic access is insufficient. A number of jurisdictions have operating procedures with local SSA offices which ease solving problems. Rules need to be developed to secure the use of SSNs in the process. For instance, “locking” SSN numbers if they have been used for an application so to make sure that no other person can unlawfully use that same number.



**Summary: Low = 8, Medium = 9,
High = 11, None = 14, Unknown = 9**

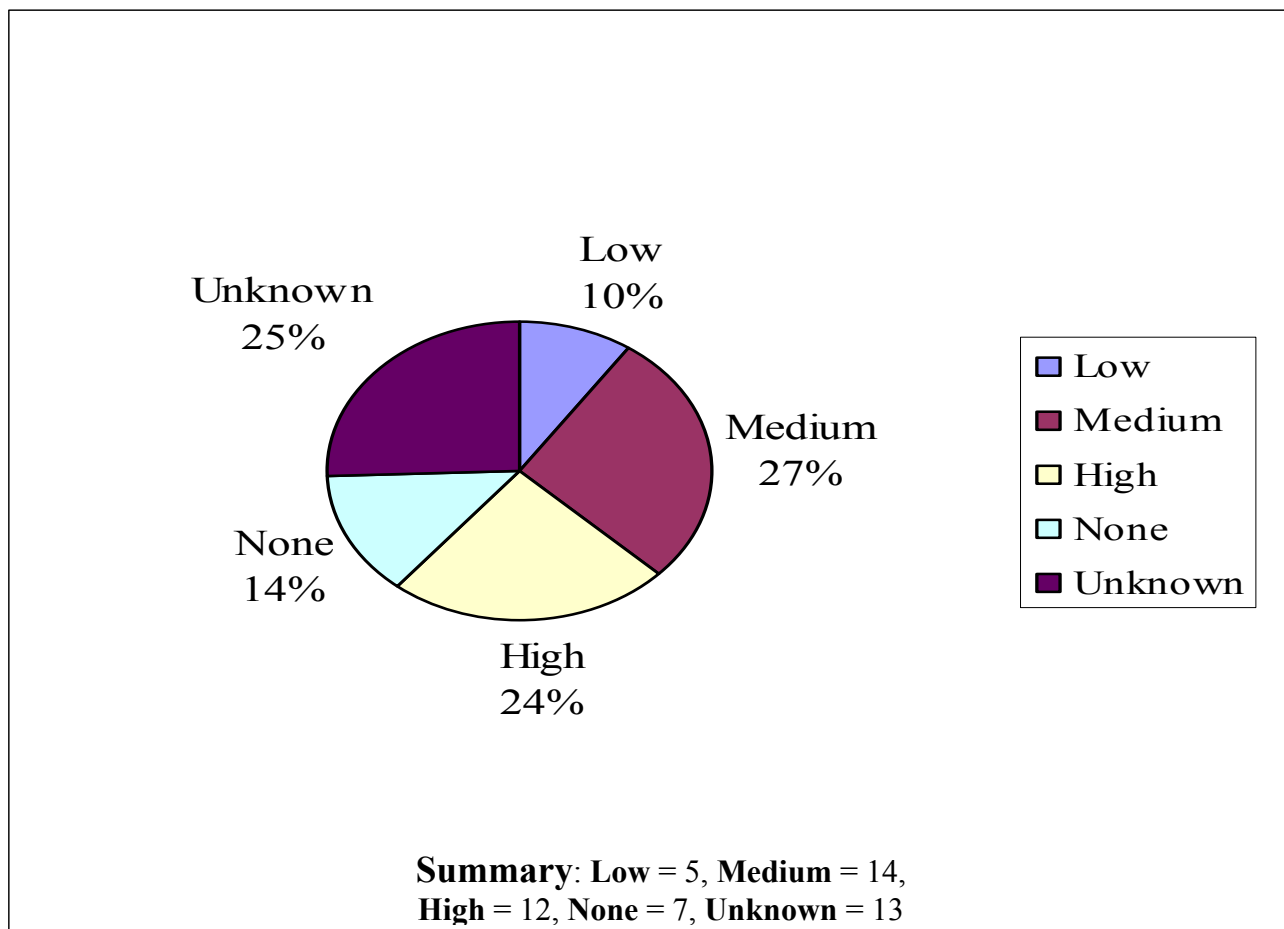
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REQUIREMENT L.

The jurisdiction must refuse to issue a DL/ID to a person holding a DL issued by another jurisdiction without confirmation that the person is terminating or has terminated the DL.

Current available systems (NDR/CDLIS) do not provide a foolproof system to check all jurisdictions to determine whether an applicant currently holds a DL from another jurisdiction. Having a system supported by an interface so that jurisdictions can easily communicate will ease impact of this requirement on all jurisdictions. The cost of developing an electronic system that will allow jurisdictions to verify driver license/record information in other jurisdictions has been estimated at \$50 million. Just under 50% of jurisdictions indicated that meeting this requirement will have medium to high impact on them.



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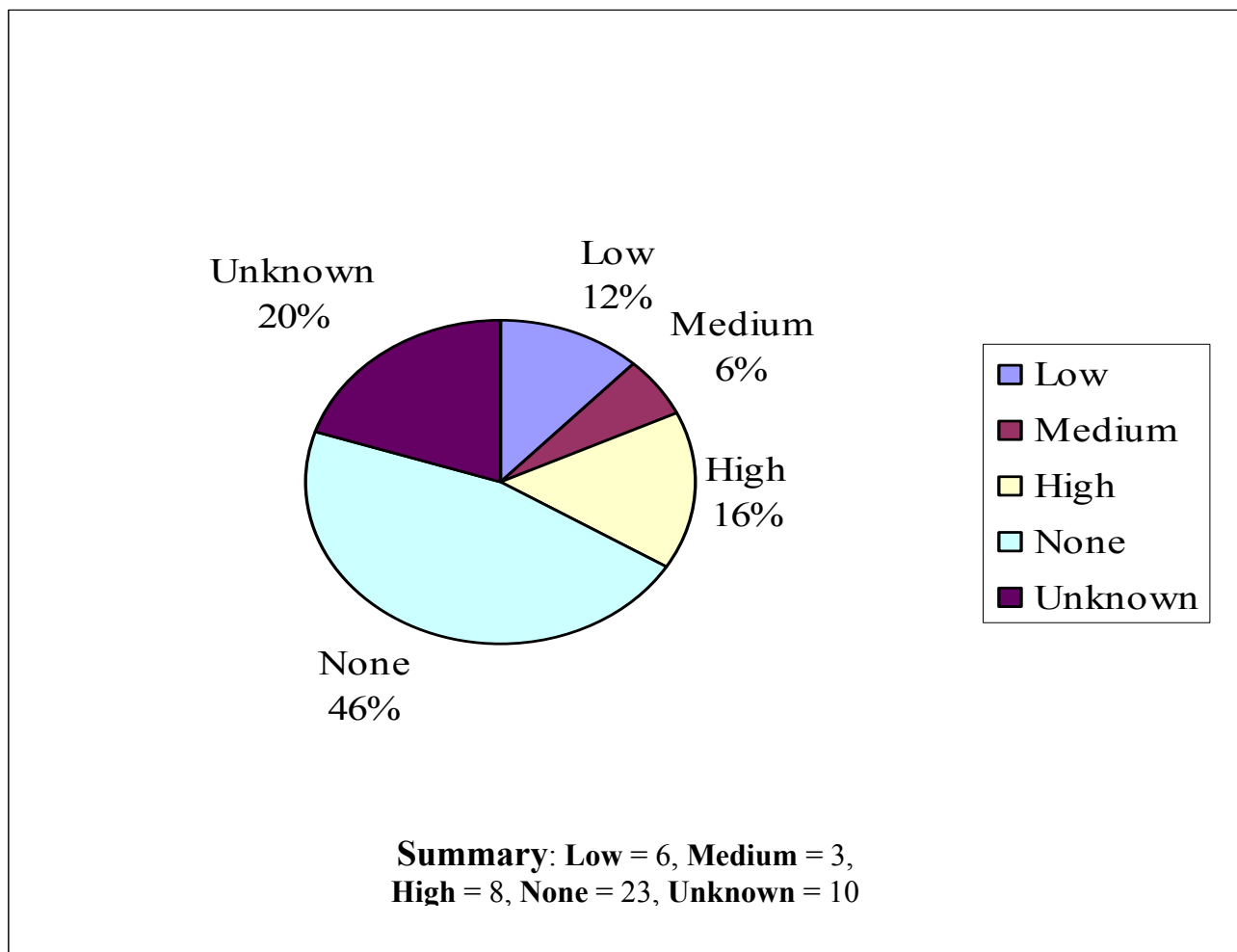
No Response = No comments provided on this requirement

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REQUIREMENT M.

Jurisdictions must ensure the physical security of card production locations and the security of document materials and papers from which cards are produced (includes both mvas and vendors).

60% of jurisdictions indicated that the impact of this requirement would be low-none, as many already have measures in place or can amend current contracts. This may have an impact on a number of jurisdictions, especially for those jurisdictions that have an over the counter issuance system. Increasing the security of the whole card manufacturing process will have a bearing on the cost per card. Increased impact also for jurisdictions if third parties involved will have to be audited on a regular basis.



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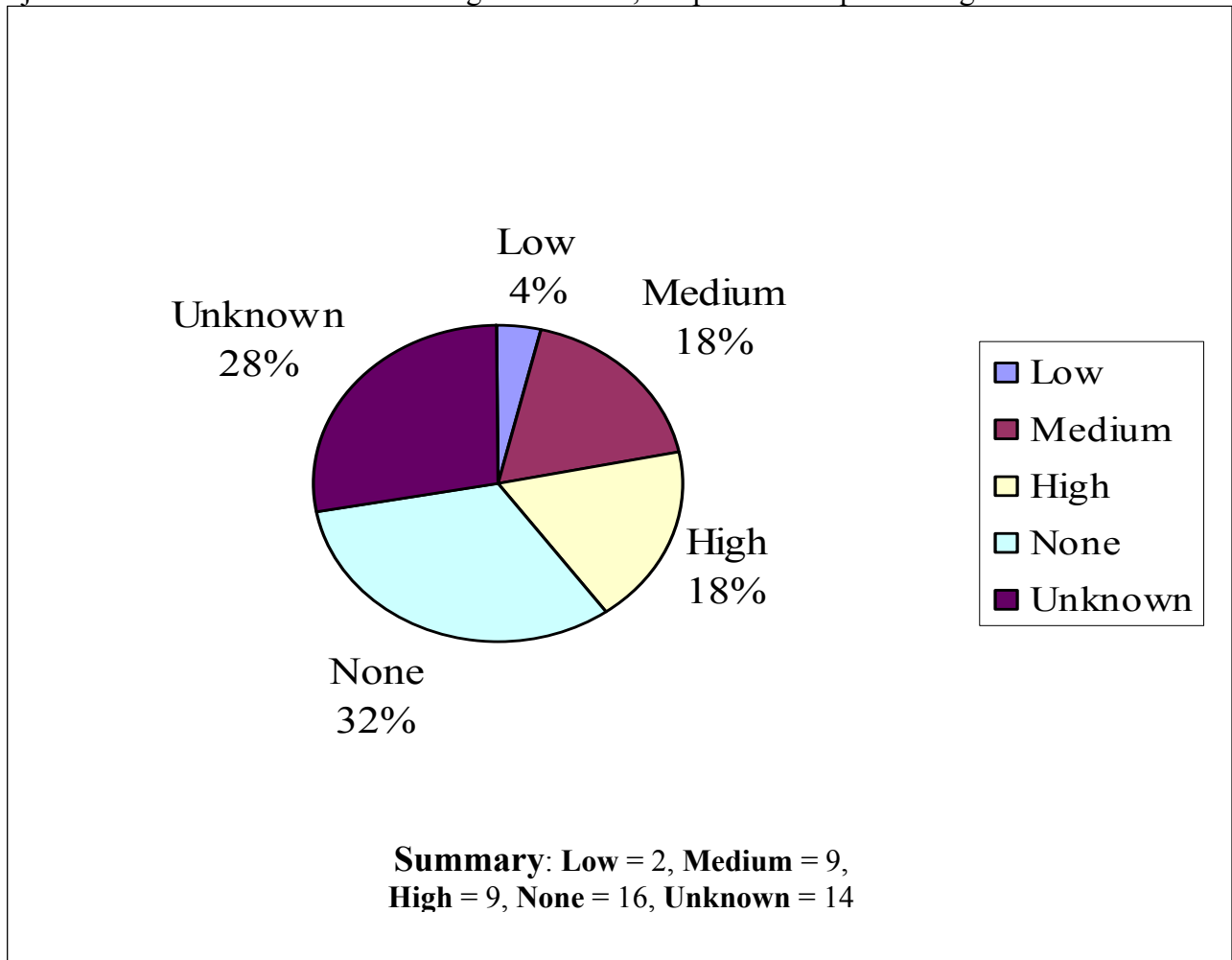
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REQUIREMENT N.

All persons authorized to manufacture or produce DLs/IDs must be subjected to appropriate security clearance requirements.

37% of jurisdictions already have some level of background check in place. The question for these jurisdictions is whether the current process will meet the Act's requirements. For jurisdictions that do not have a background check, the potential impact is larger.



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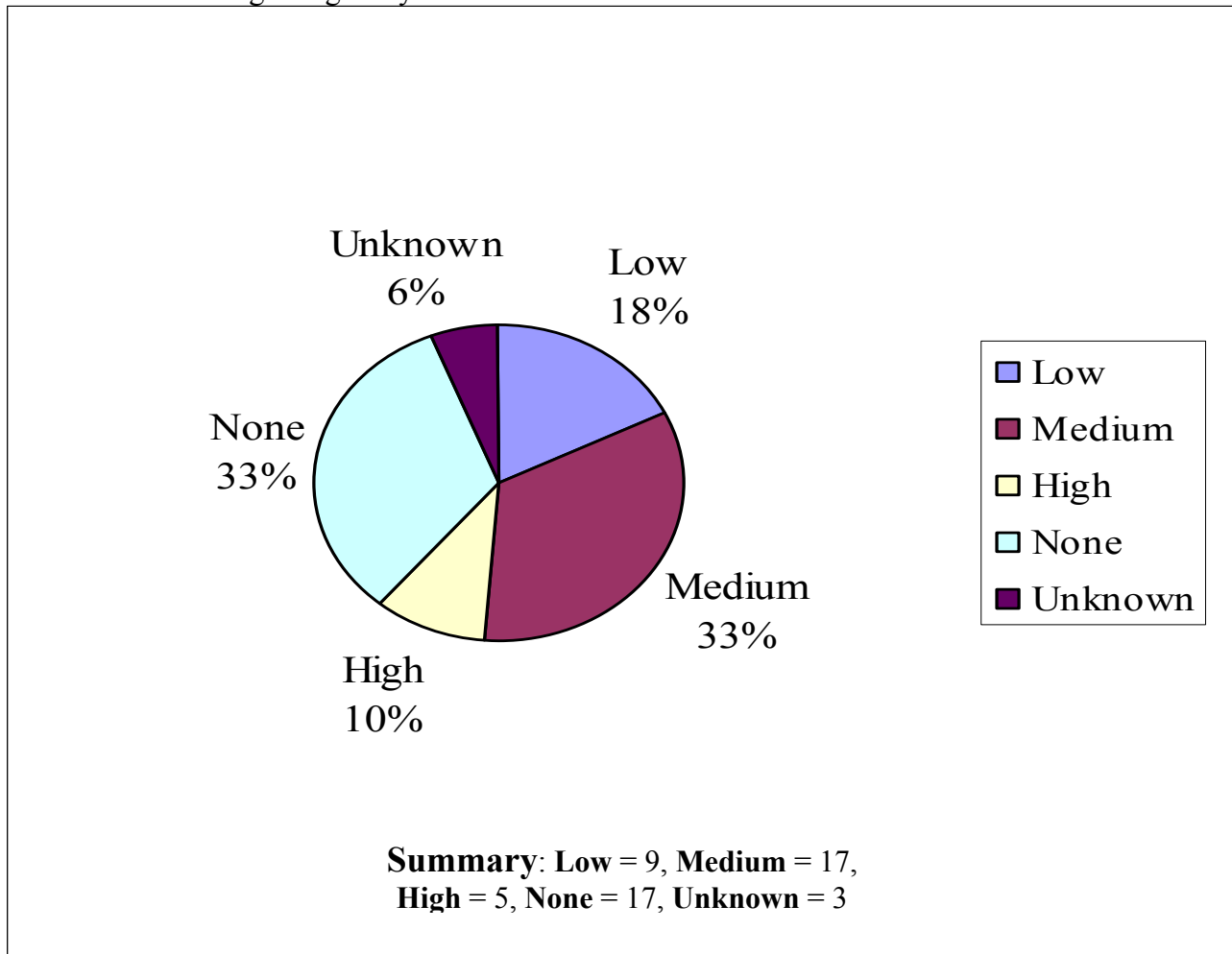
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REQUIREMENT O.

Jurisdictions must establish fraudulent document recognition training programs for persons engaged in the issuance of DLs/IDs.

53% of all jurisdictions have a training program in place or provide training delivered by outside parties. However, 41% see this requirement as having a medium to high impact. The issue of cost for the training being a key factor.



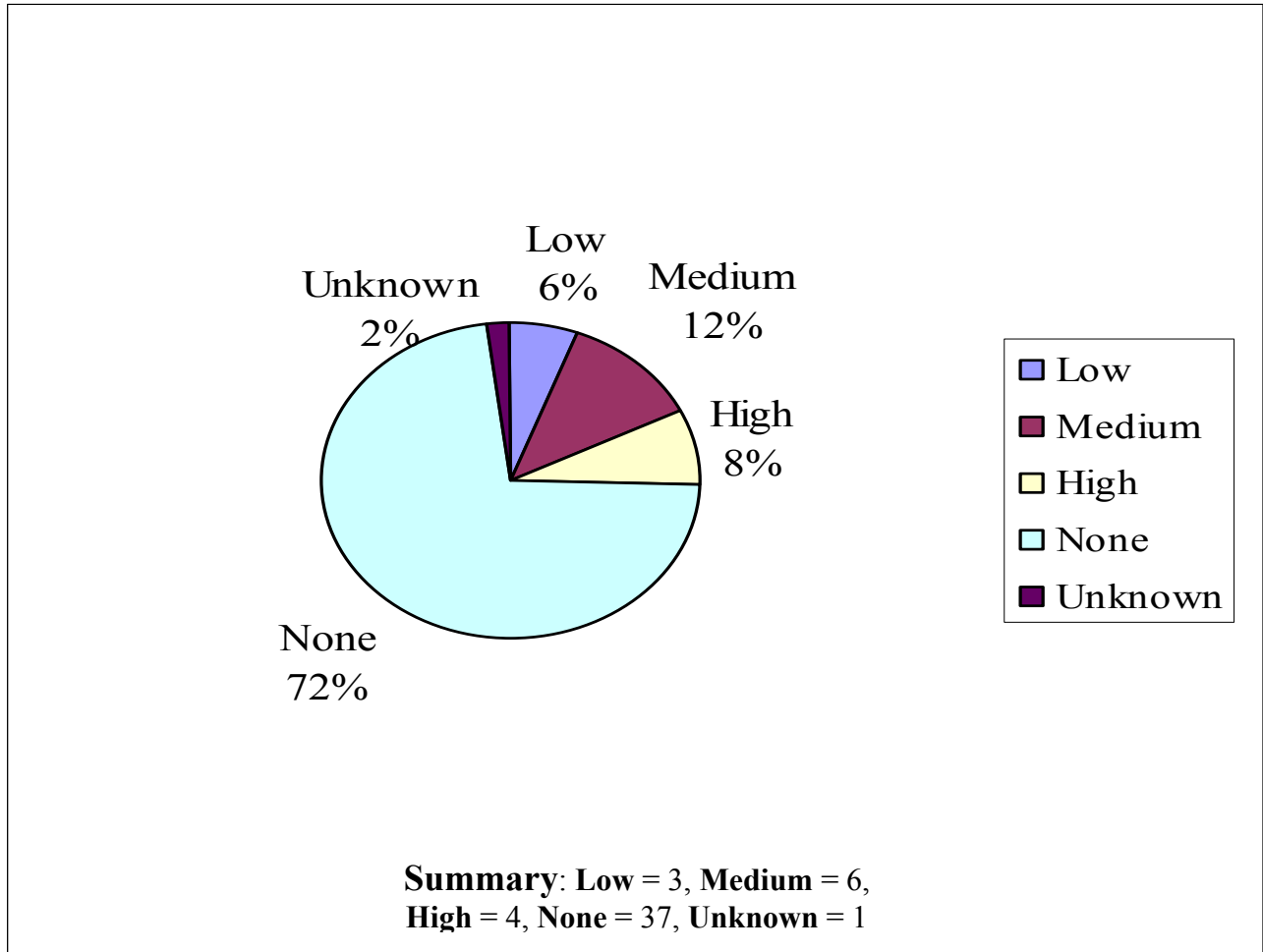
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REQUIREMENT P.

The period of validity of all DLs/IDs that are not temporary is limited to a period that does not exceed 8 years.

80% of the jurisdictions indicated that this requirement will have low-none impact. This will impact a number of jurisdictions that allow for longer validity periods.



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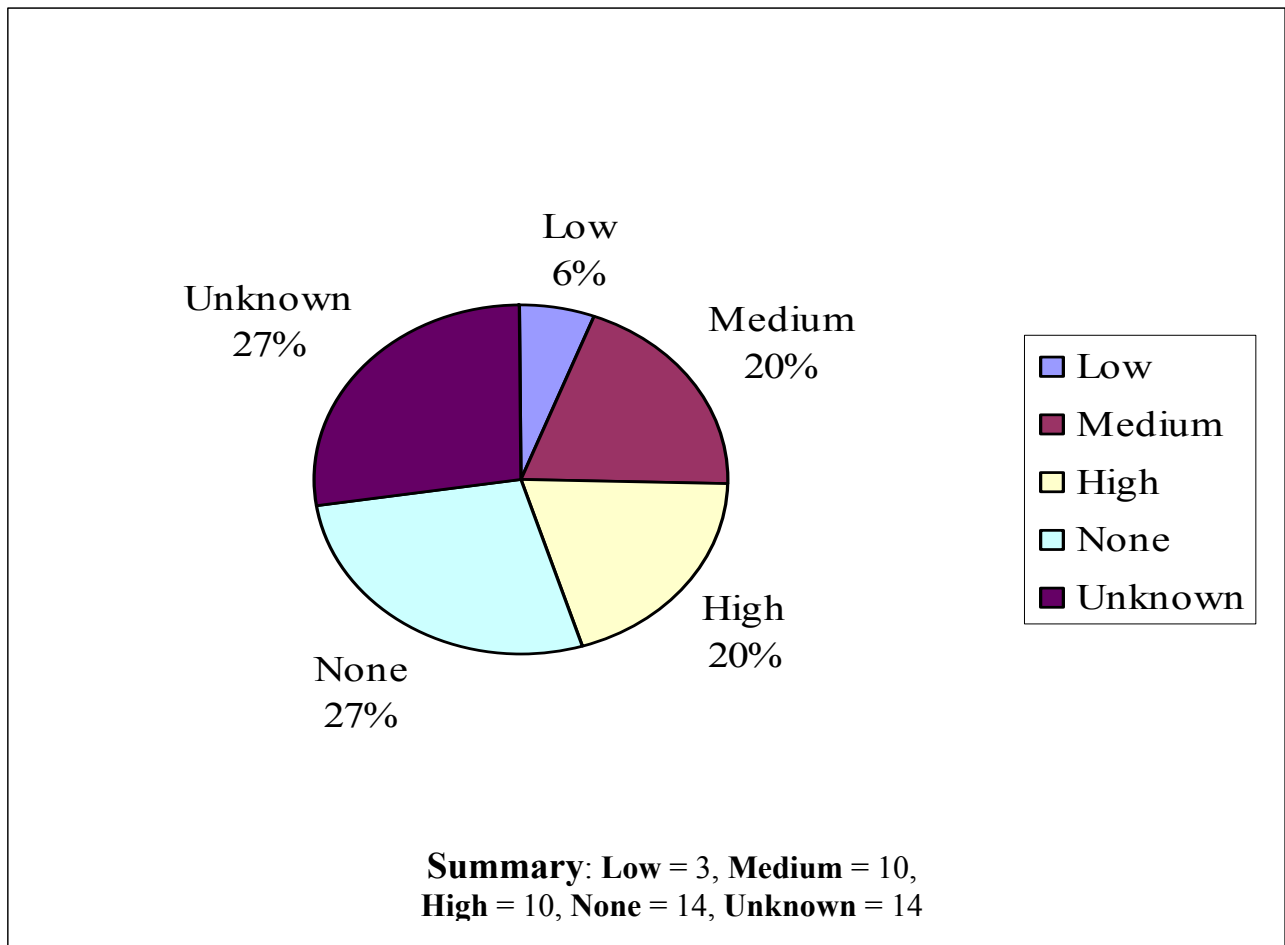
REQUIREMENT Q.

Jurisdictions may issue a DL/ID that does not meet the act's requirement, but it must state on its face that it may not be accepted by any federal agency for identification or any official purpose and must use a unique design or color indicator to alert federal agency and law enforcement personnel.

There was no clear majority response to this requirement. In part it depends on whether a jurisdiction opts for this alternative. With the creation of new documents that provide proof of eligibility to drive the issue of reciprocity between jurisdictions comes into play.

Will other jurisdictions accept the new documents as proof of eligibility to drive?

Will jurisdictions challenge this requirement?



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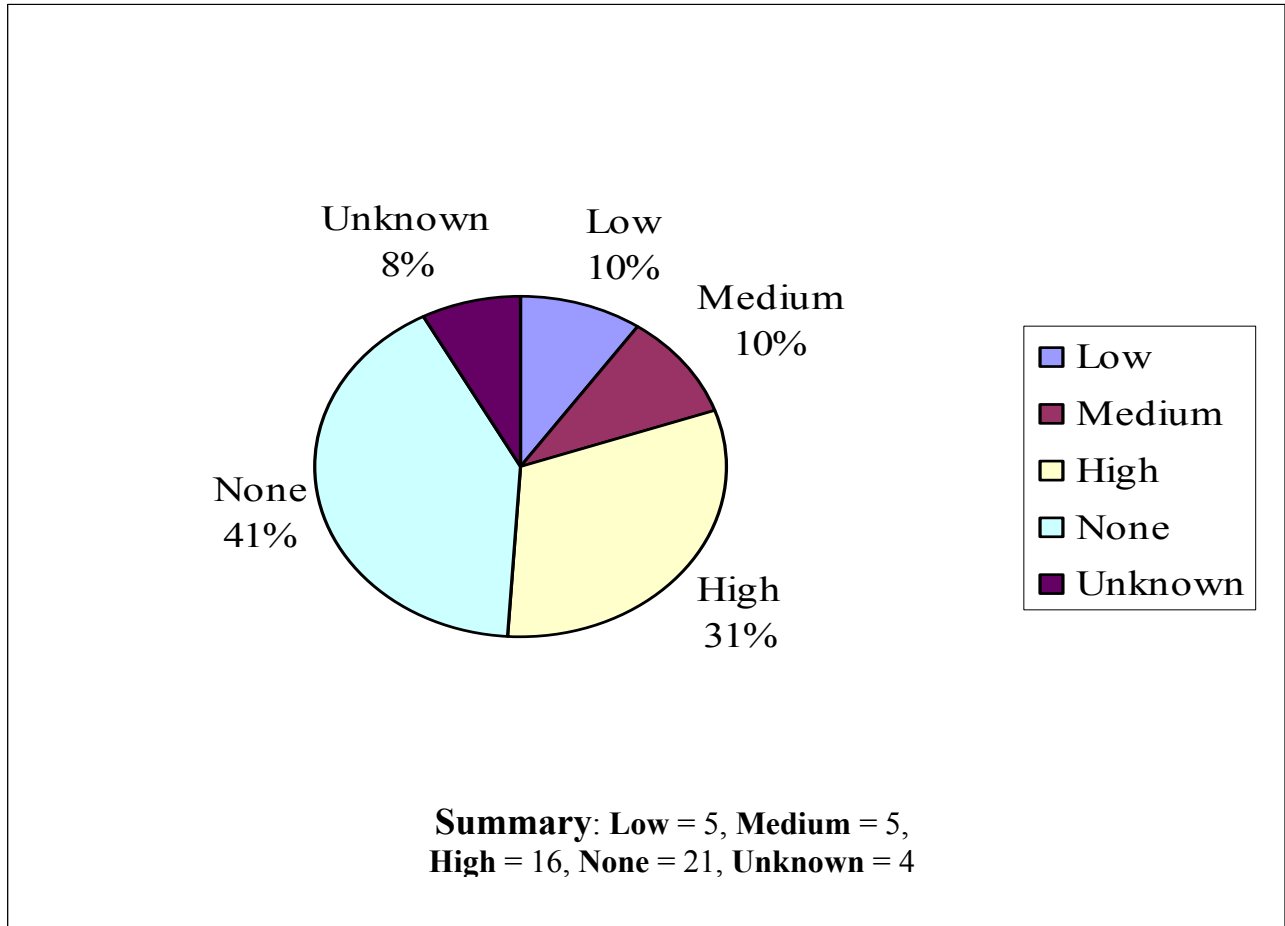
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REQUIREMENT R.

Jurisdictions must require, before issuing a DL or ID card to a person, valid documentary evidence of lawful status in the U.S.

Medium – High, 39% impact for the jurisdictions that currently do not have a lawful presence requirement. While 52% view this requirement as having none-low impact.



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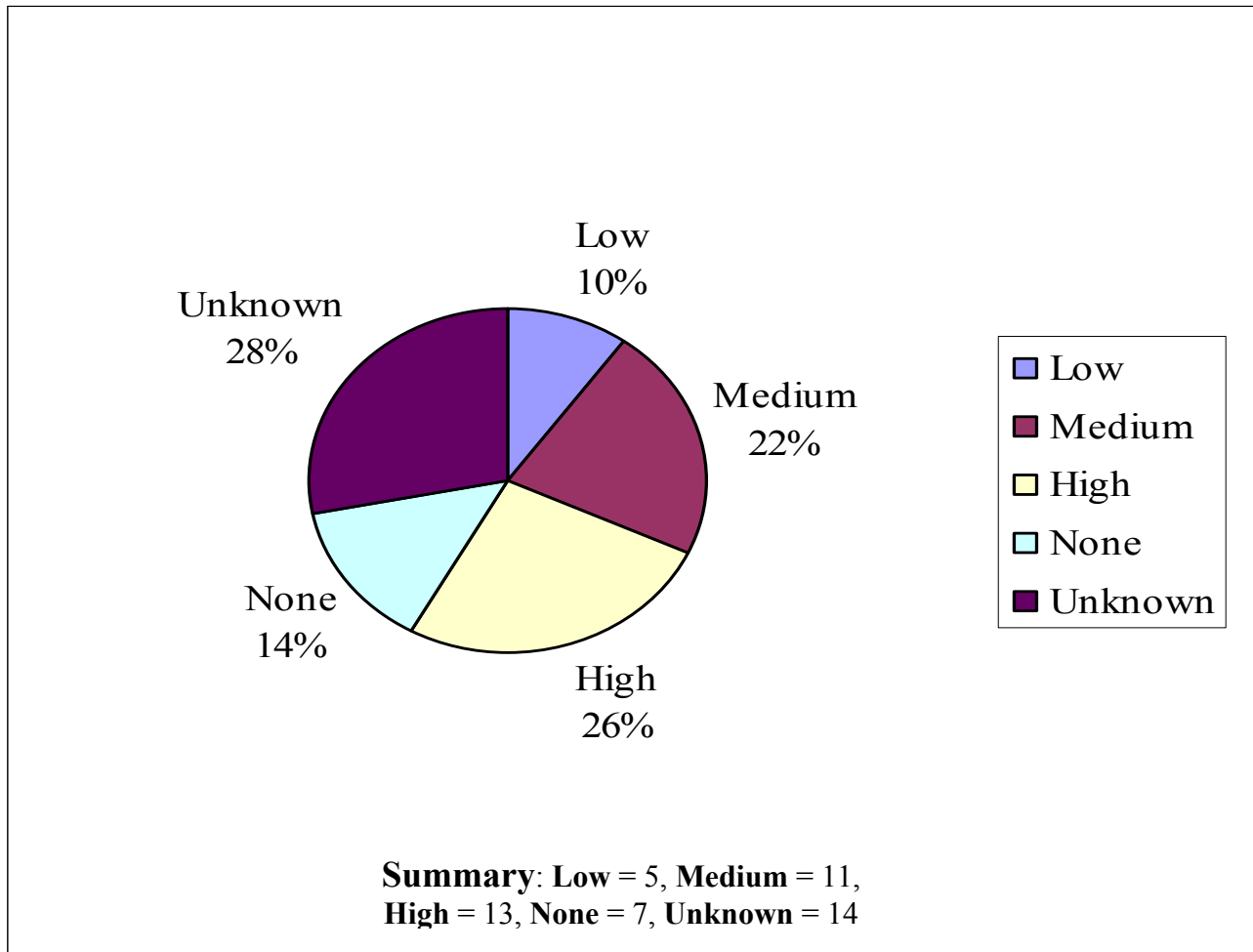
No Response = No comments provided on this requirement

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REQUIREMENT S.

Electronic access to all other jurisdictions' MV database.

47% of responses indicated that this requirement would have medium to high impact. There is mainly a legislative and IT impact. Some jurisdictions do not allow or limit access to third parties/other government agencies. CDLIS and NDR will have to be integrated into this system.



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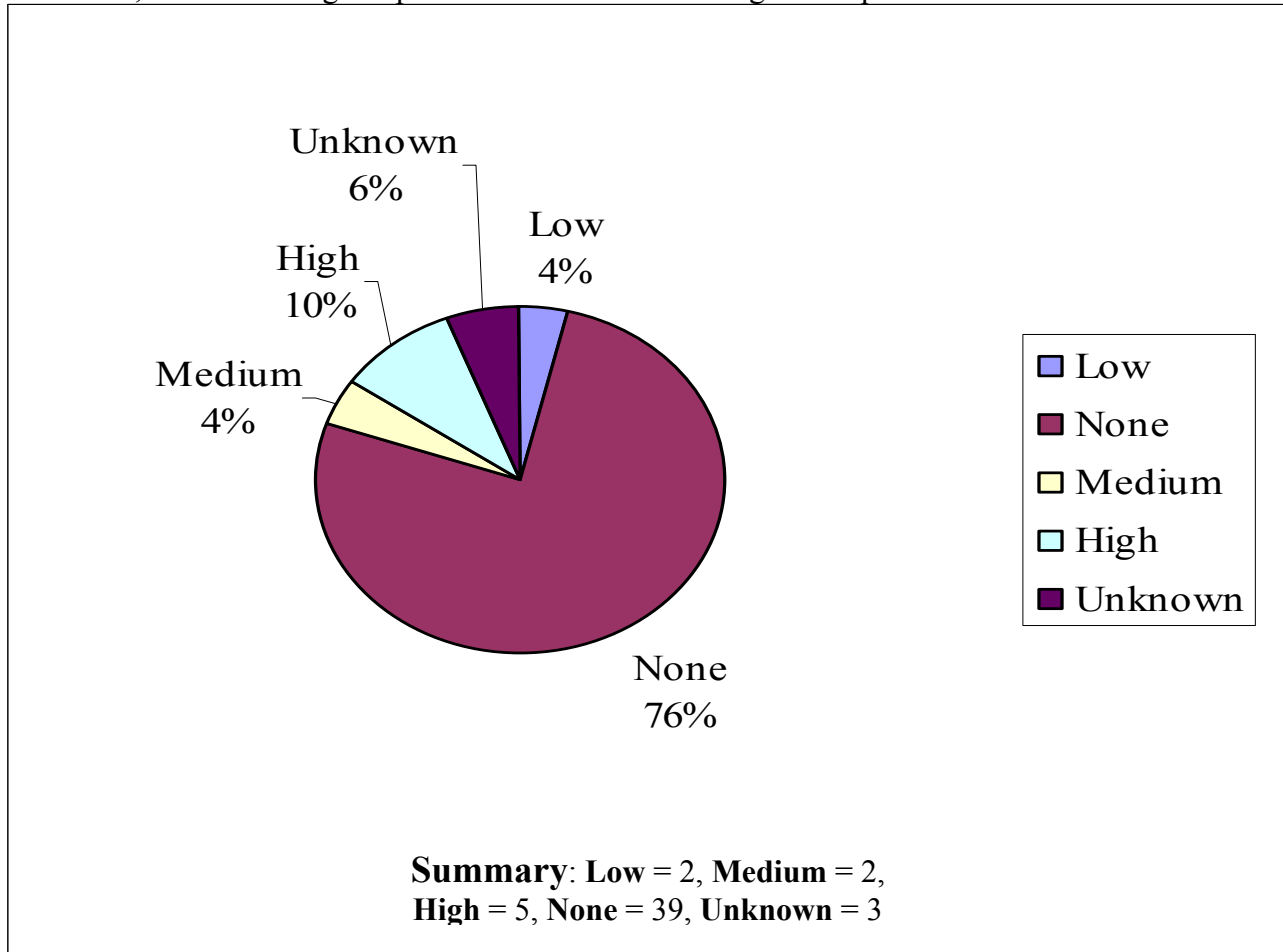
No Response = No comments provided on this requirement

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REQUIREMENT T.

Jurisdictions must maintain a MV database that contains all data fields printed on the DL/ID and driver histories, including violations, suspensions and points.

Overall, all jurisdictions have a system in place that maintains the information required. Some however, indicated a high impact associated with meeting this requirement.



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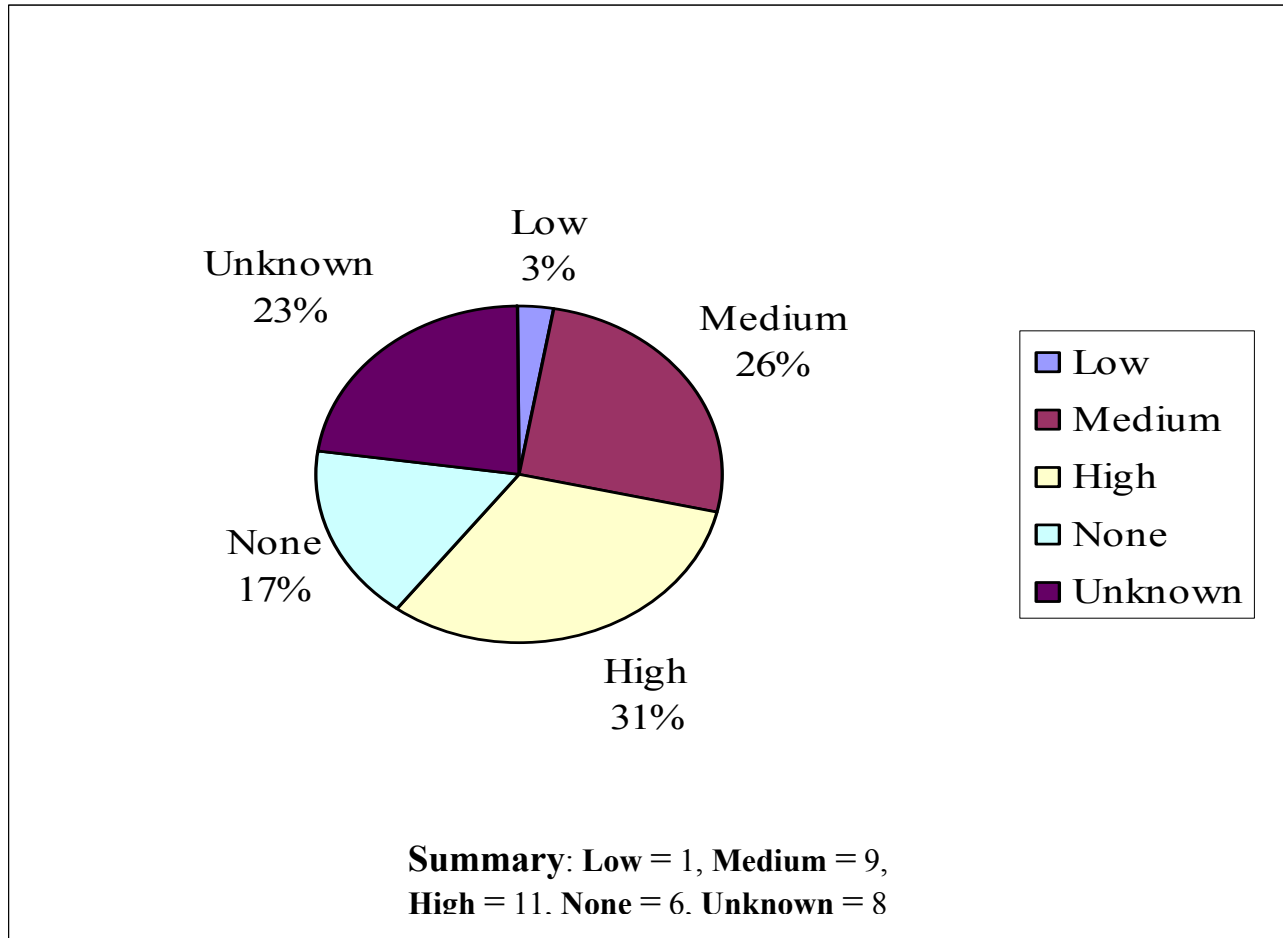
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REQUIREMENT U.

Optional: Development and issuance of a certificate of driving – not for federal identification purposes – for those who cannot prove lawful presence.

58% of jurisdictions indicated that this requirement would have a medium to high impact.



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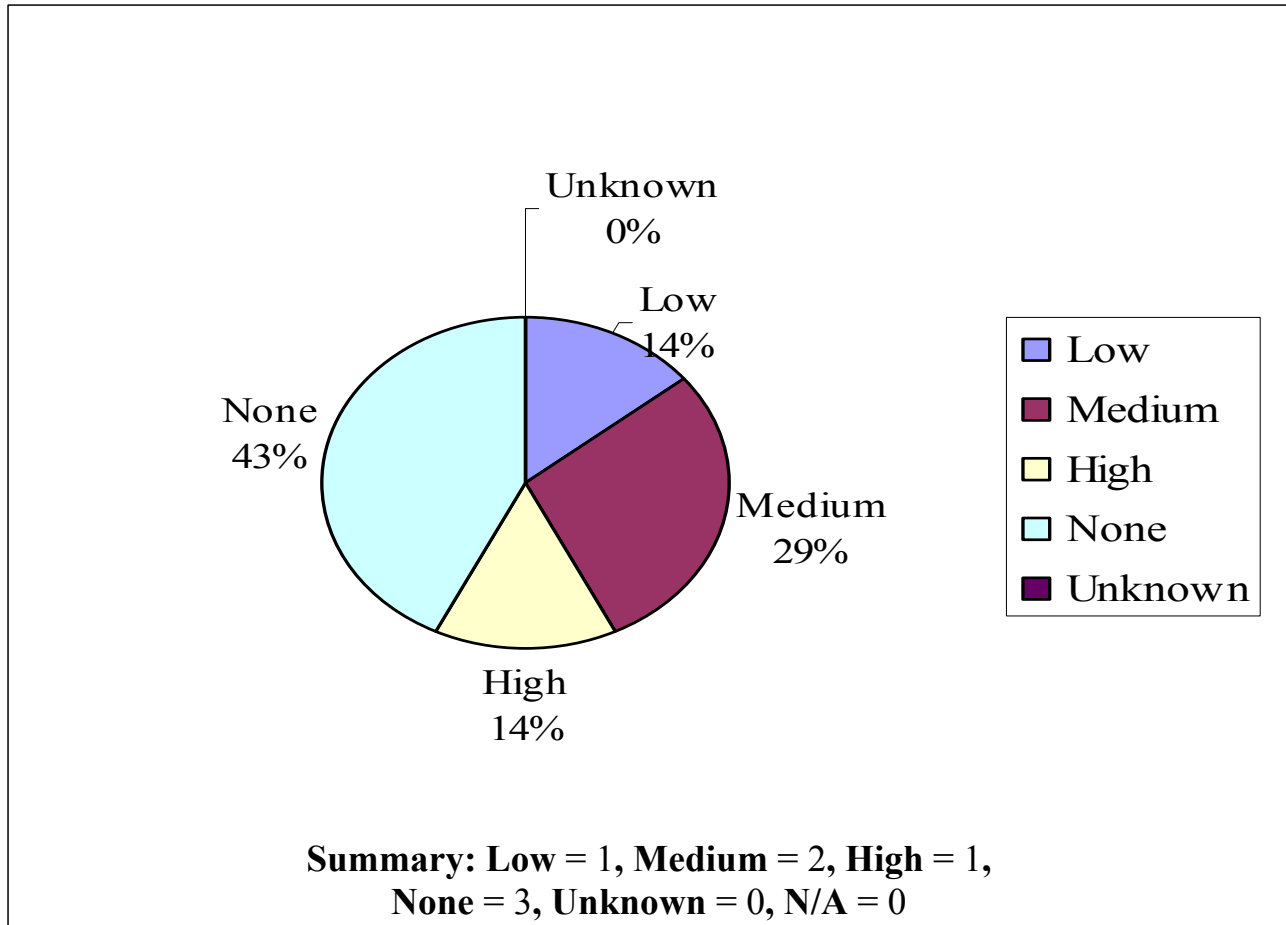
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REQUIREMENT A.

The DL/ID card issued to a person must include full legal name.

43% of jurisdictions indicated that capturing of full legal name would have a medium to high impact.



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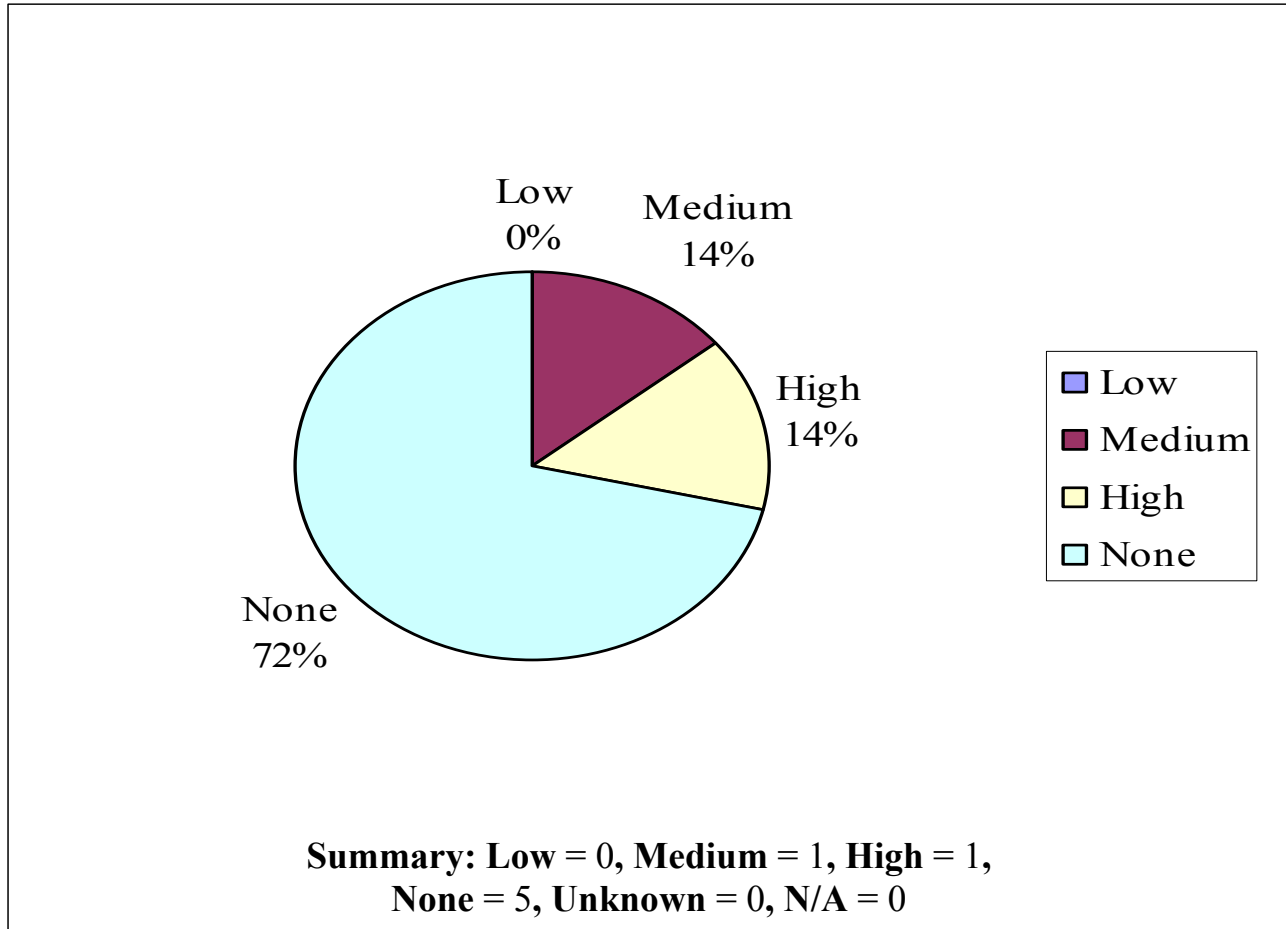
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REQUIREMENT B.

Have the following data elements/features on the document such as: legal name, DOB, etc.

Generally, it appears that most (72%) of the jurisdictions did not have any impact to capturing most of the data elements on the document. There were some 28% who indicated medium to high impact.



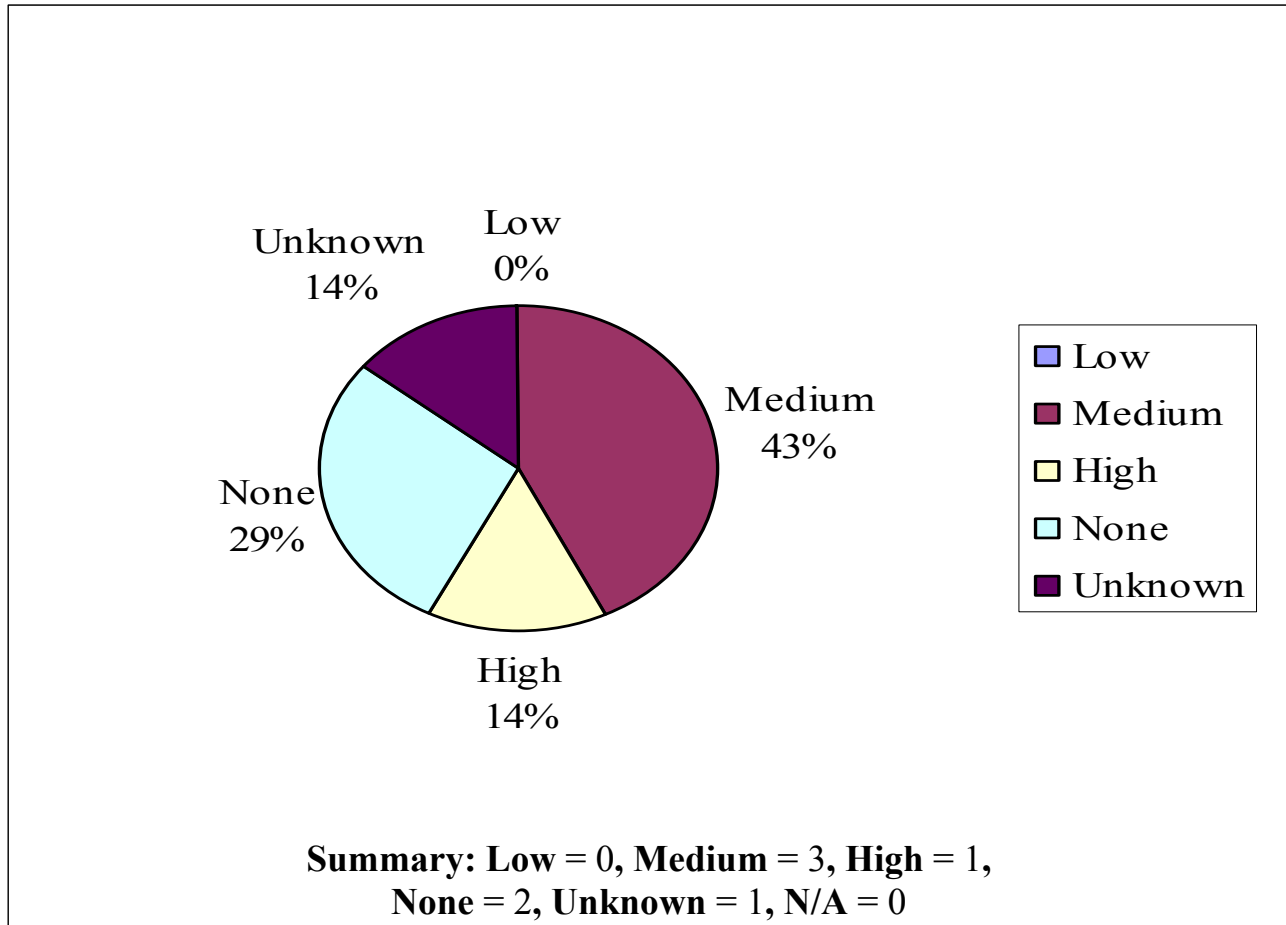
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REQUIREMENT C.

Temporary DL/ID cards will be valid only during the period of time of the applicant's authorized stay in the U.S.

57% of jurisdictions indicated that this requirement would have medium to high impact.



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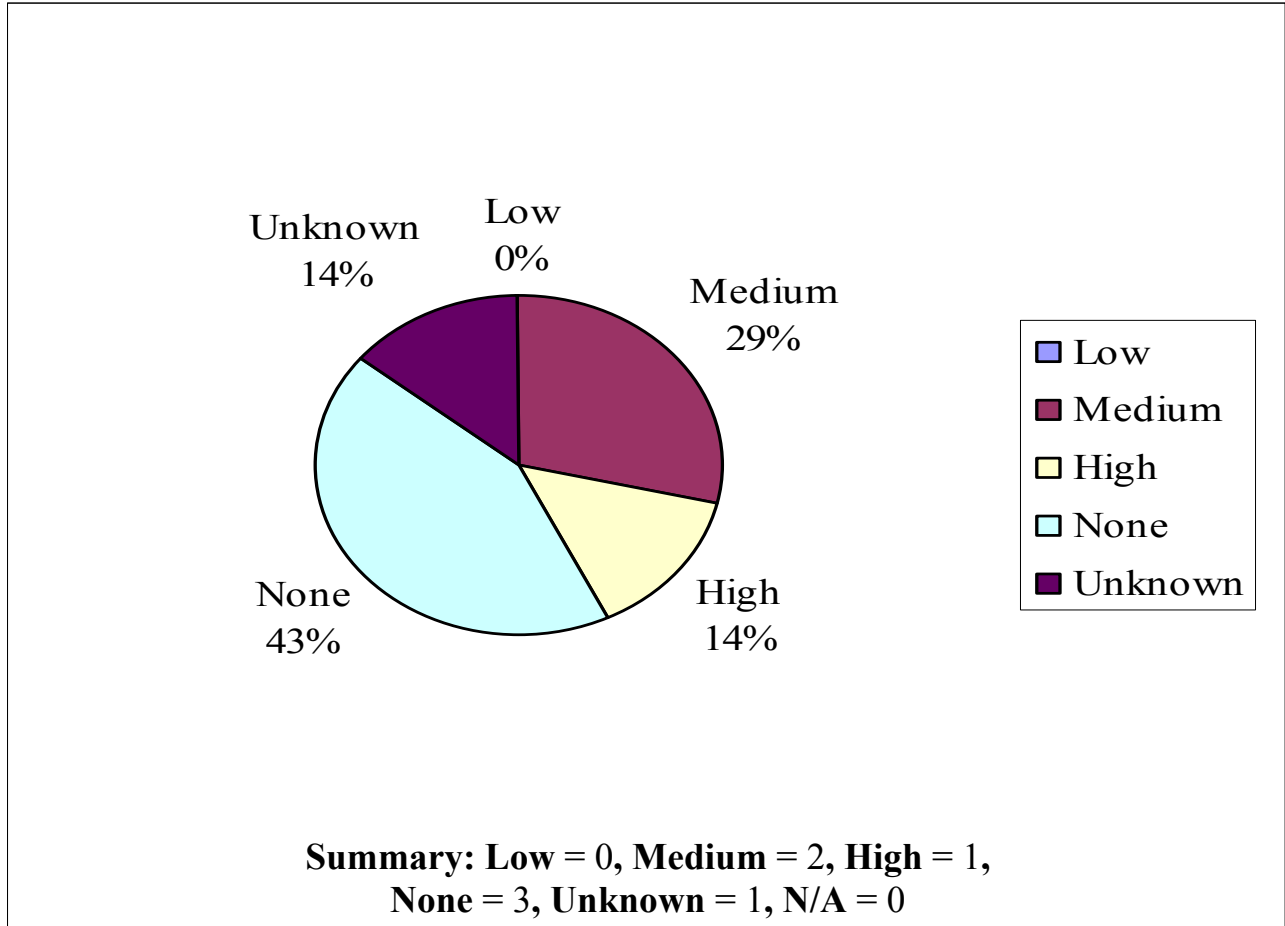
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REQUIREMENT D.

Amending card design to indicate this “different than usual” expiration date.

There was an even split between jurisdictions who indicated that this requirement would have a medium to high (43%) impact or no impact (43%).



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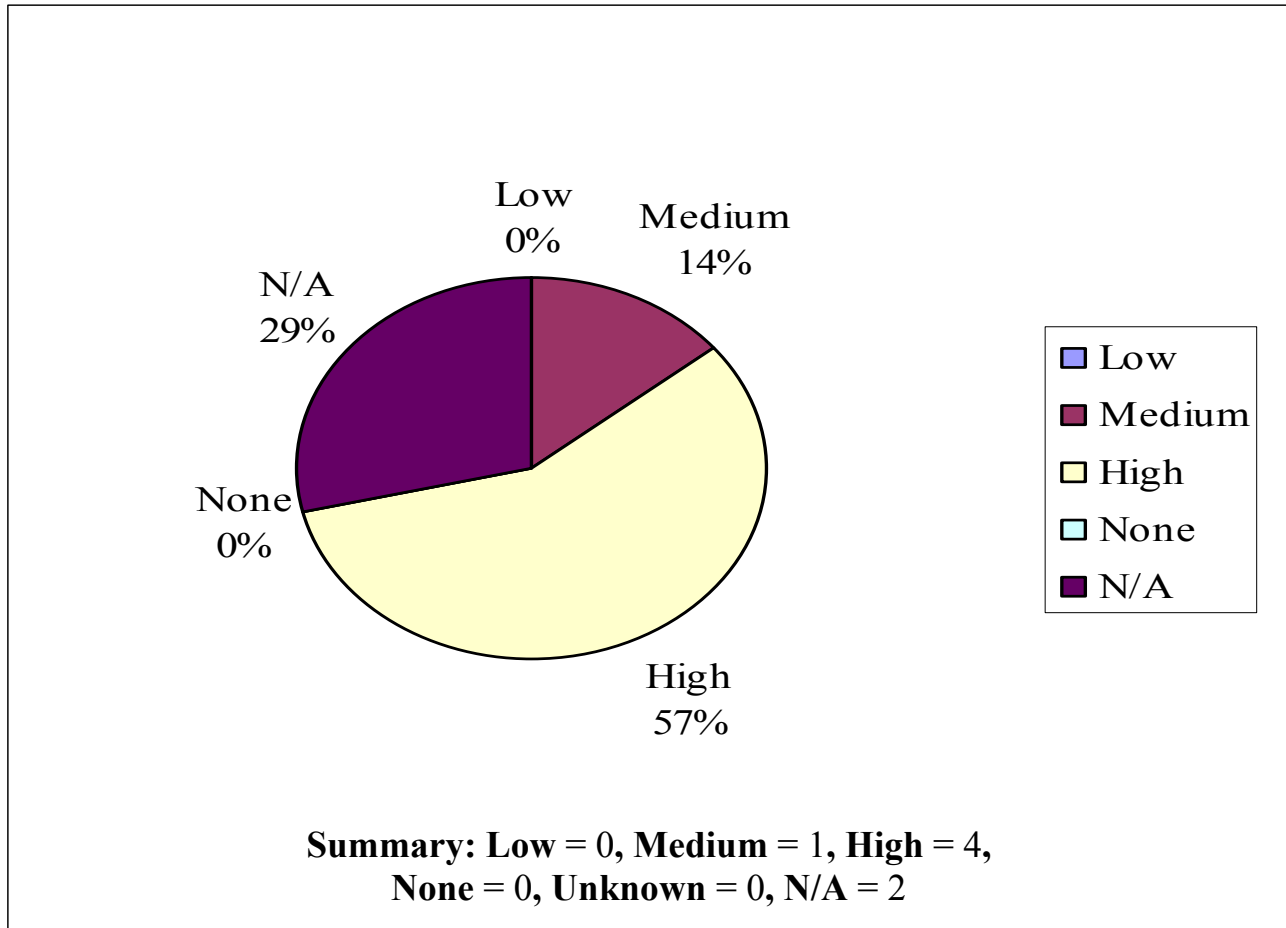
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REQUIREMENT E.

Jurisdictions must verify with the issuing agency the issuance, validity and completeness of each source (or “breeder”) documents presented to verify identity.

More than 50% of jurisdictions indicated meeting this requirement would have a major impact. Primarily because these are US based systems. Establishment of similar verification systems in CDA was identified as being explored.



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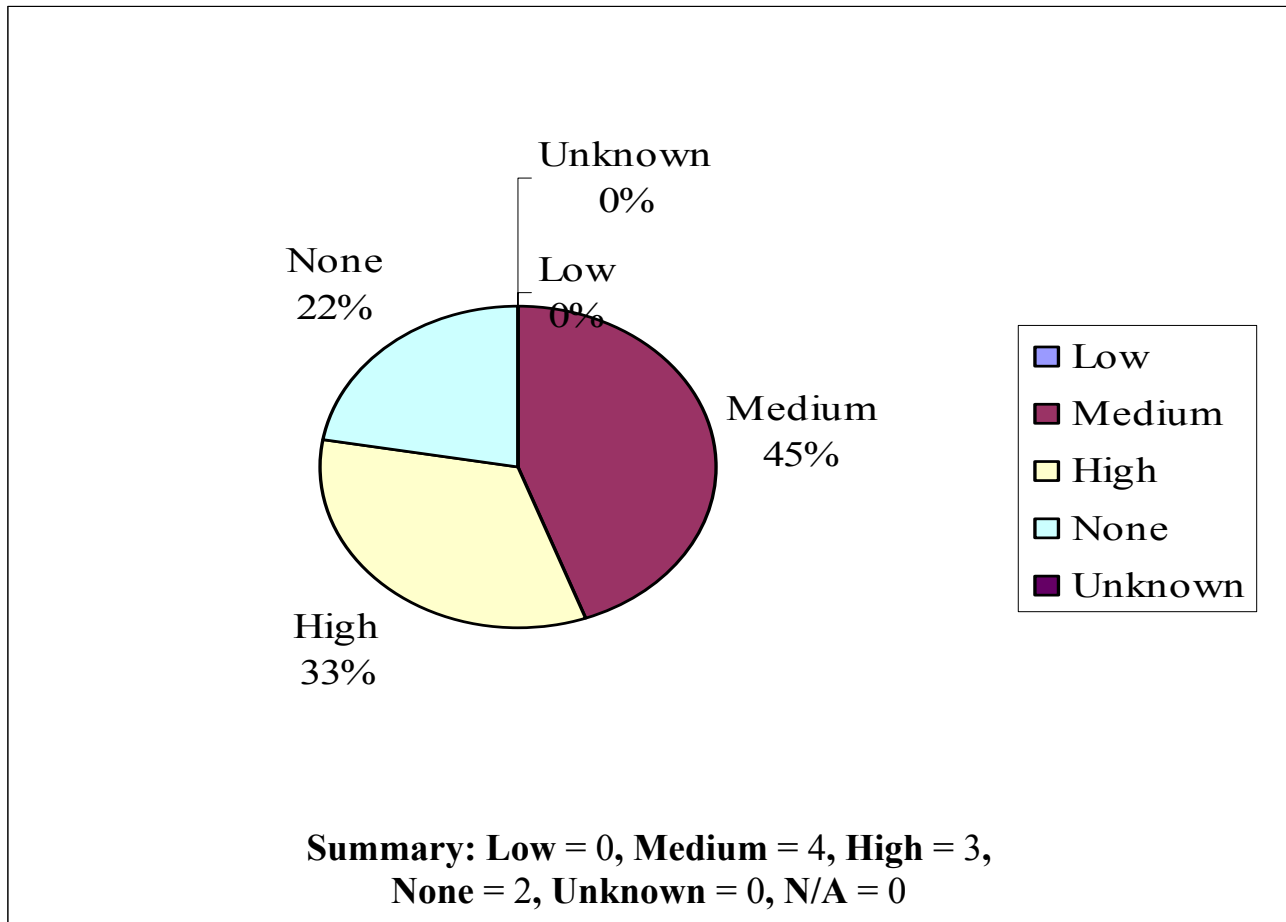
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REQUIREMENT G.

Jurisdictions must employ technology to capture and retain digital images of these source documents in electronic storage in a transferable format.

78% indicated that meeting this requirement would have medium or high impact. Like, US jurisdictions, the digital capture was seen as a high cost impact.



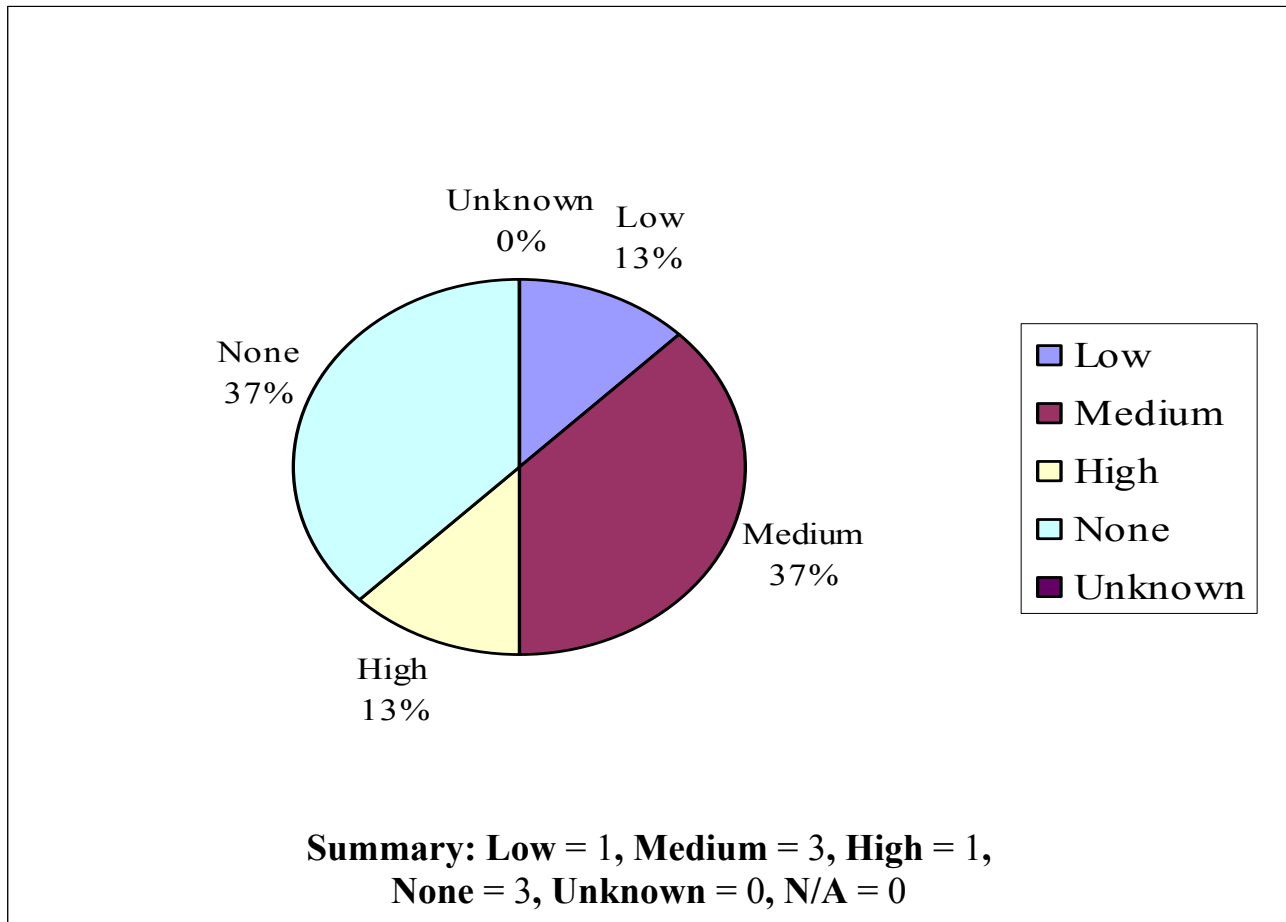
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REQUIREMENT H.

Jurisdictions must retain paper or digital images of source documents for a minimum period of time.

50% indicated this would have medium to high impact. The lengthy retention was seen as a major issue.



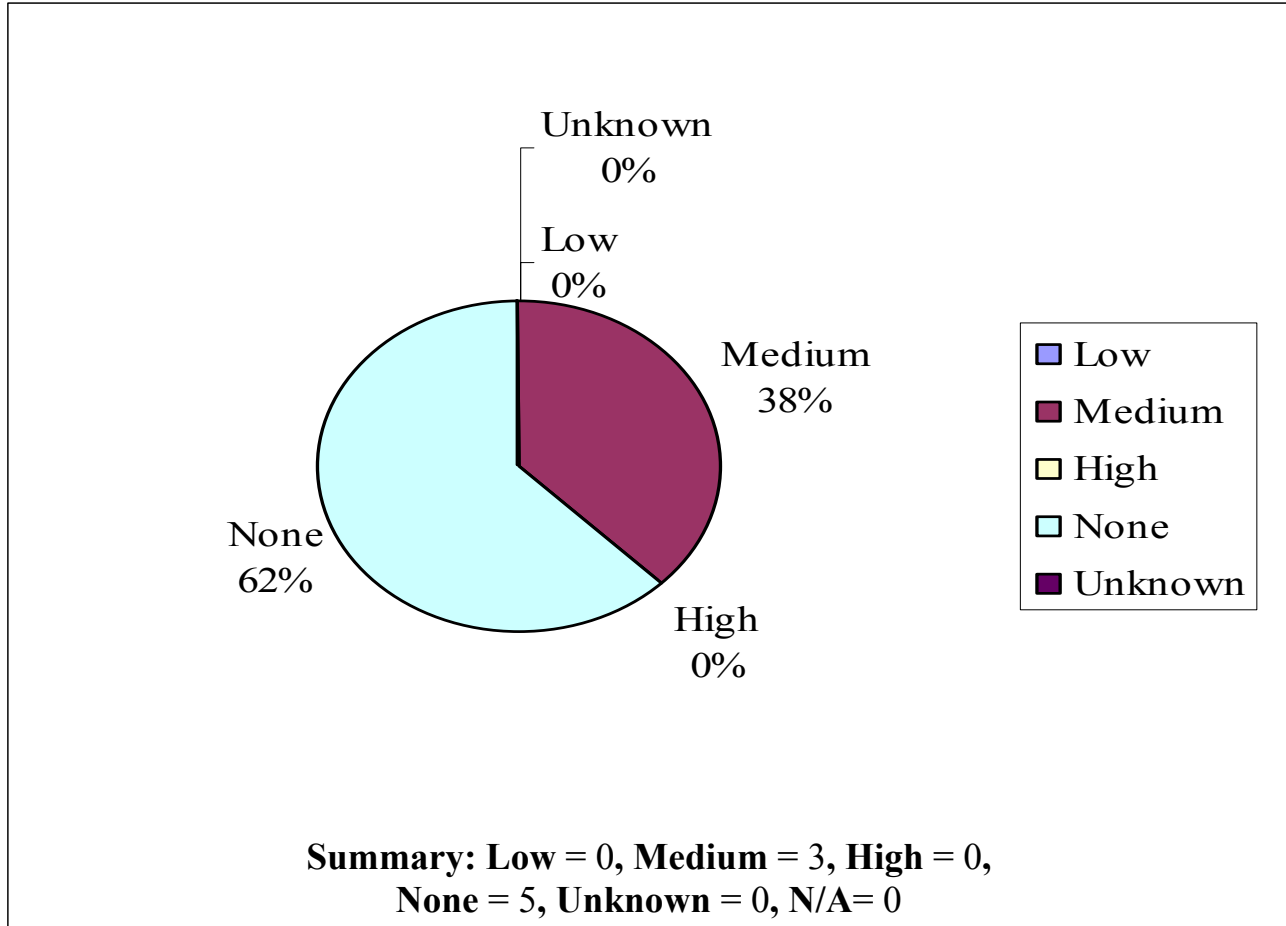
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REQUIREMENT I.

Each person applying for a DL/ID card must be subjected to mandatory facial image capture.

A majority (62%) indicated there would be no impact of this requirement.



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High = Major reprogramming, training, legislation/major costs

Unknown = Need more information to determine impact

N/A = Not applicable

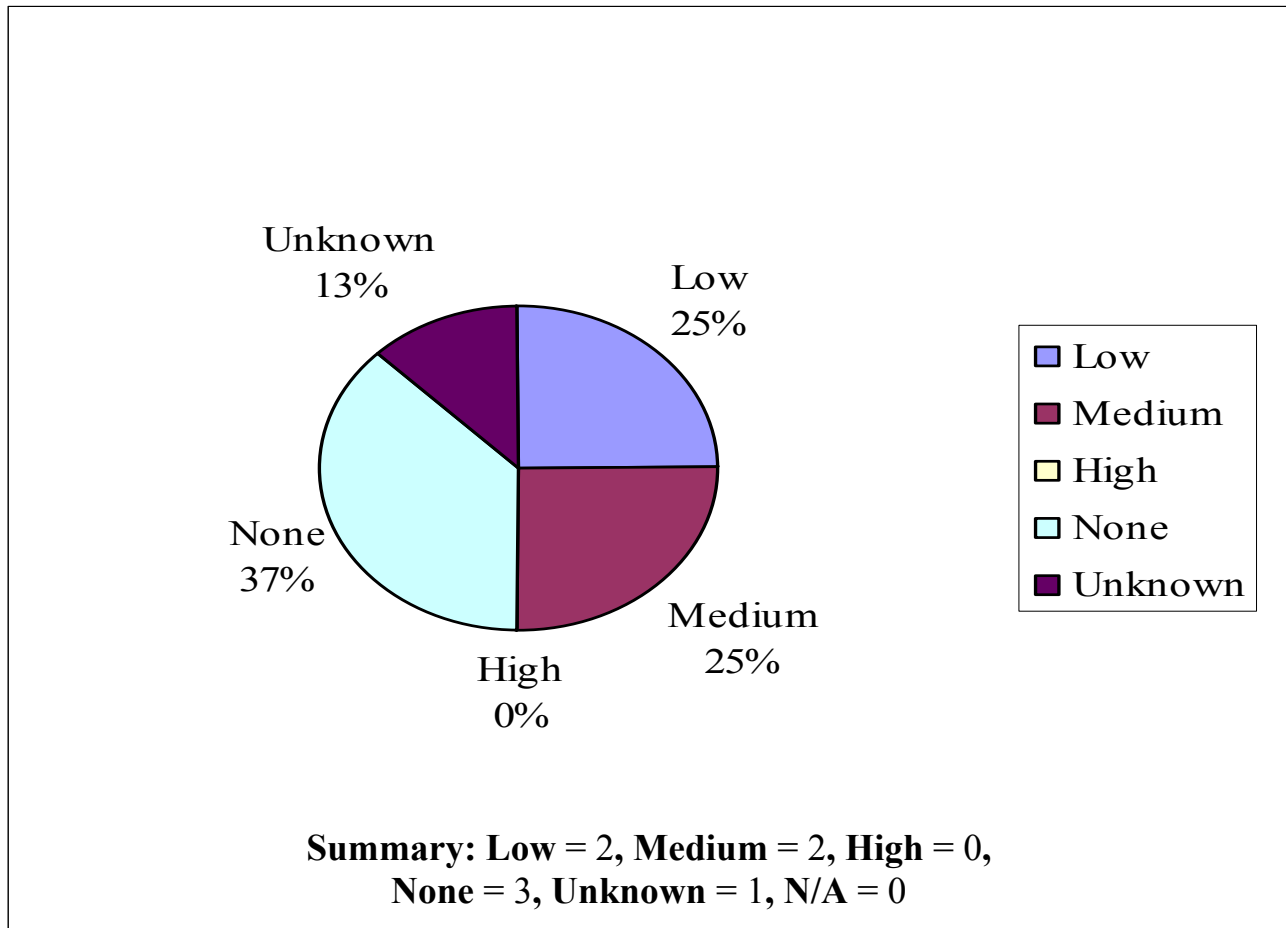
No Response = No comments provided on this requirement

DRAFT

REQUIREMENT J.

Jurisdictions must establish an effective procedure to confirm or verify a renewing applicant's information.

The majority (62%) of jurisdictions indicated this requirement would have no to low impact. There were some that indicated medium impact.



Low = Requires some policy changes

Medium = Policy changes, computer programming

None = Already in place

High = Major reprogramming, training, legislation/major costs

Unknown = Need more information to determine impact

N/A = Not applicable

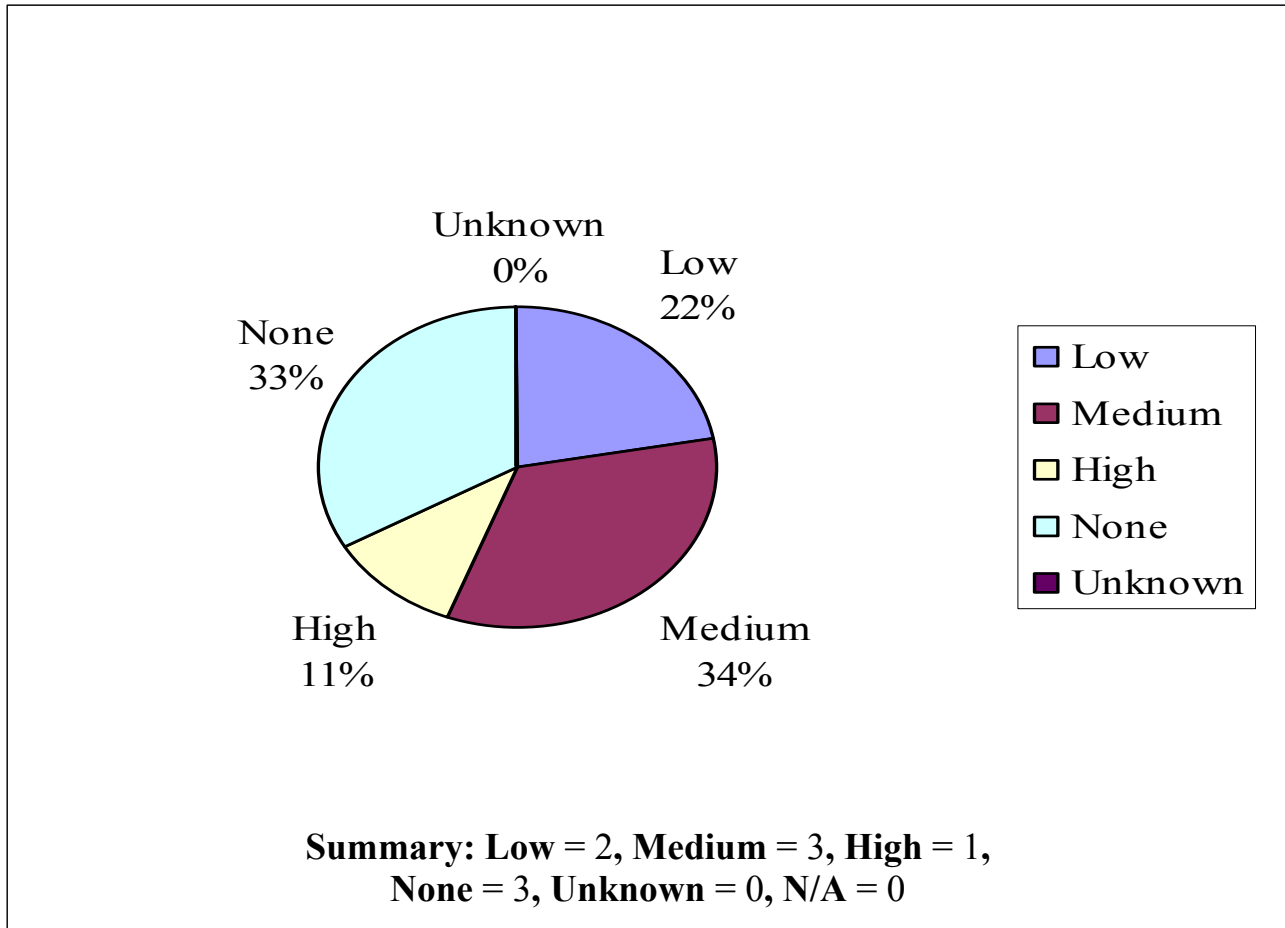
No Response = No comments provided on this requirement

DRAFT

REQUIREMENT L.

The jurisdiction must refuse to issue a DL/ID to a person holding a DL issued by another jurisdiction without confirmation that the person is terminating or has terminated the DL.

55% indicated that the impact would be low to none as it relates to access CDA and some US drivers via IRE/AAMVAnet bridge. However, broader access to US states was identified as having medium to high impact for 45% of jurisdictions.



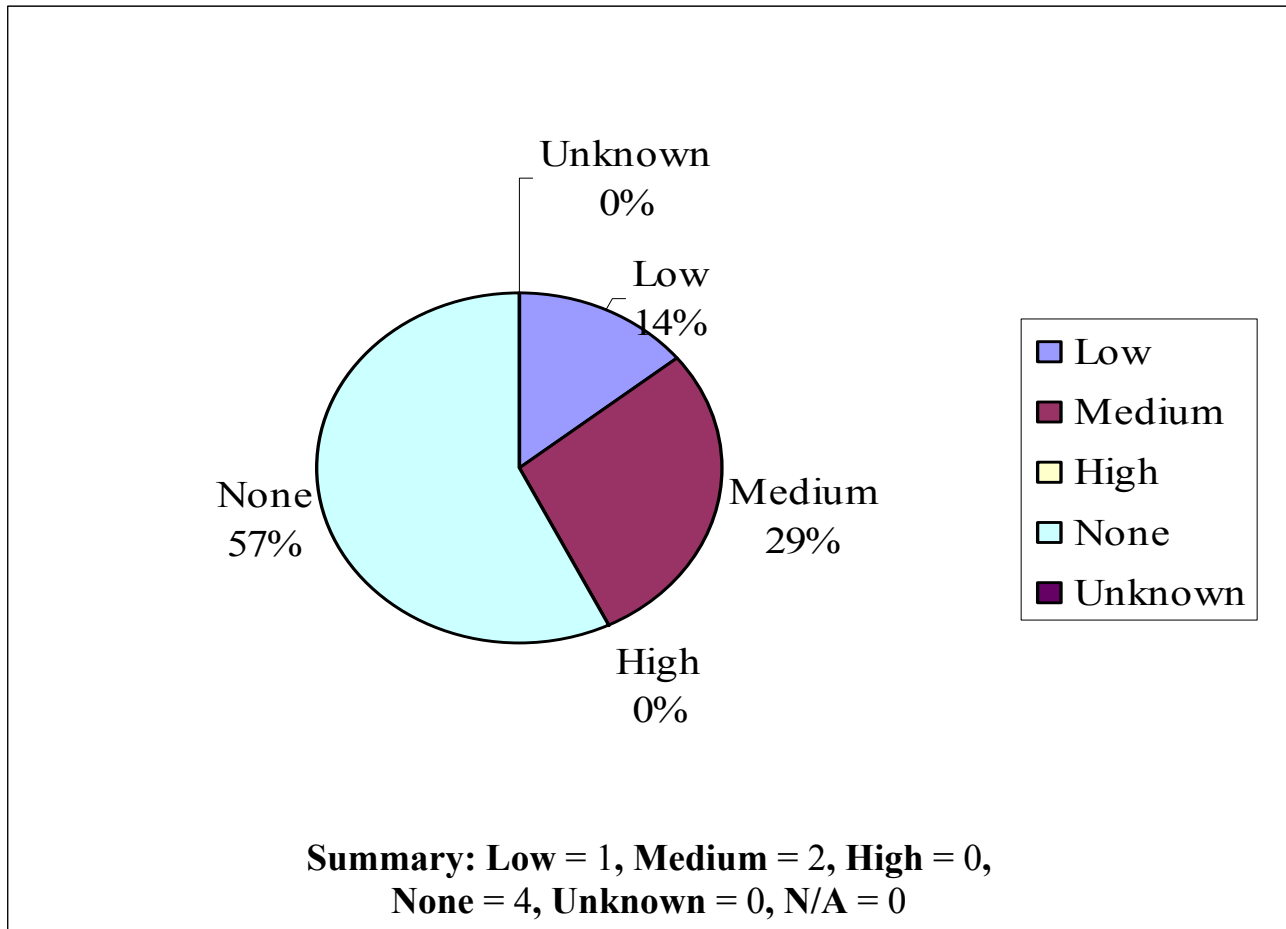
Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	No Response = No comments provided on this requirement
N/A = Not applicable		

DRAFT

REQUIREMENT M.

Jurisdictions must ensure the physical security of card production locations and the security of document materials and papers from which cards are produced (includes both MVAs and vendors).

71% indicated that meeting this requirement would have none to low impact. However, 29% indicated it would be medium impact.



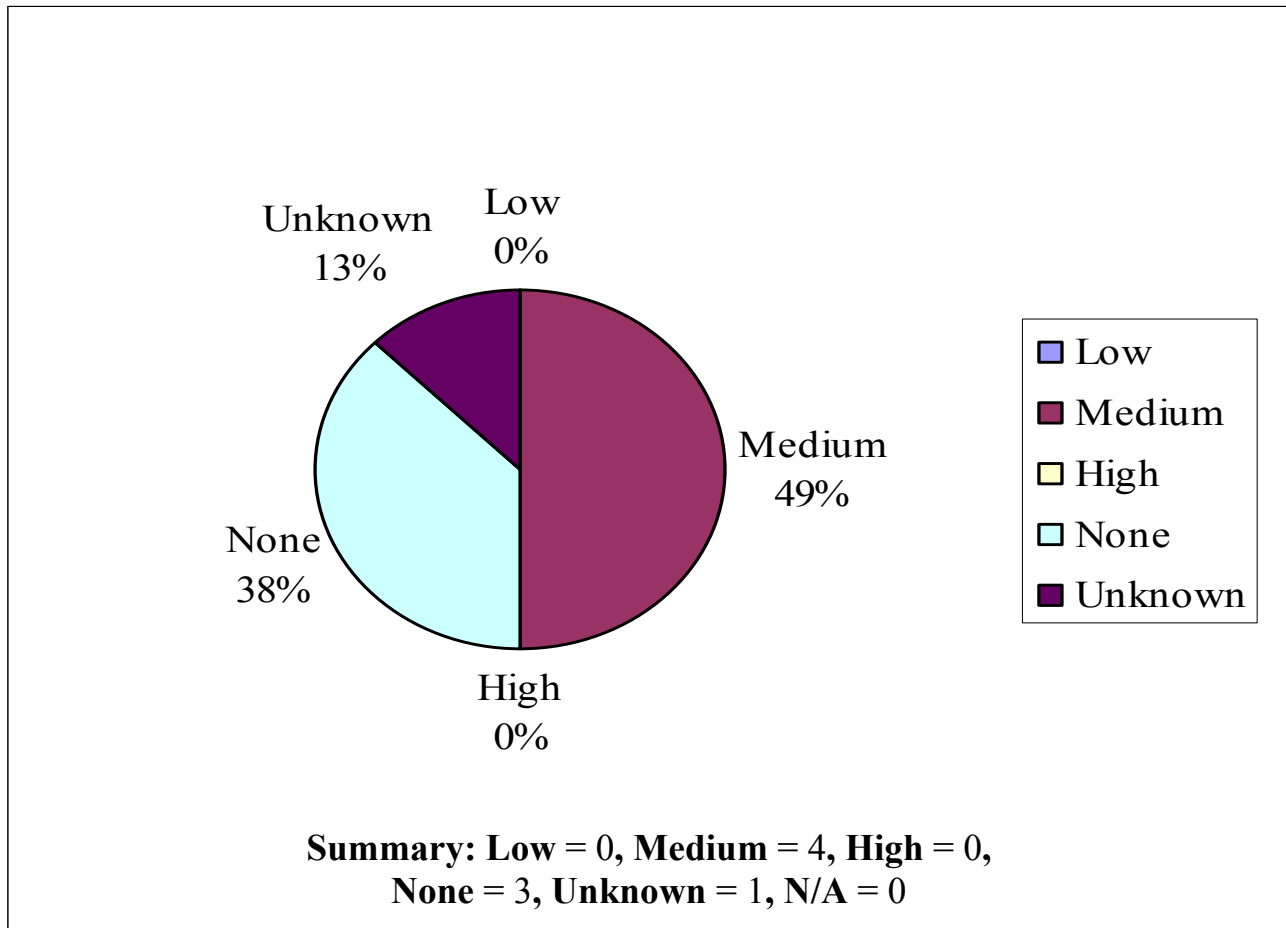
Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

DRAFT

REQUIREMENT N.

All persons authorized to manufacture or produce DLs/IDs must be subjected to appropriate security clearance requirements.

Nearly one half (49%) indicated meeting this requirement would have medium impact. This appears to be relative to whether the jurisdictions uses over the counter vs. central issuance.



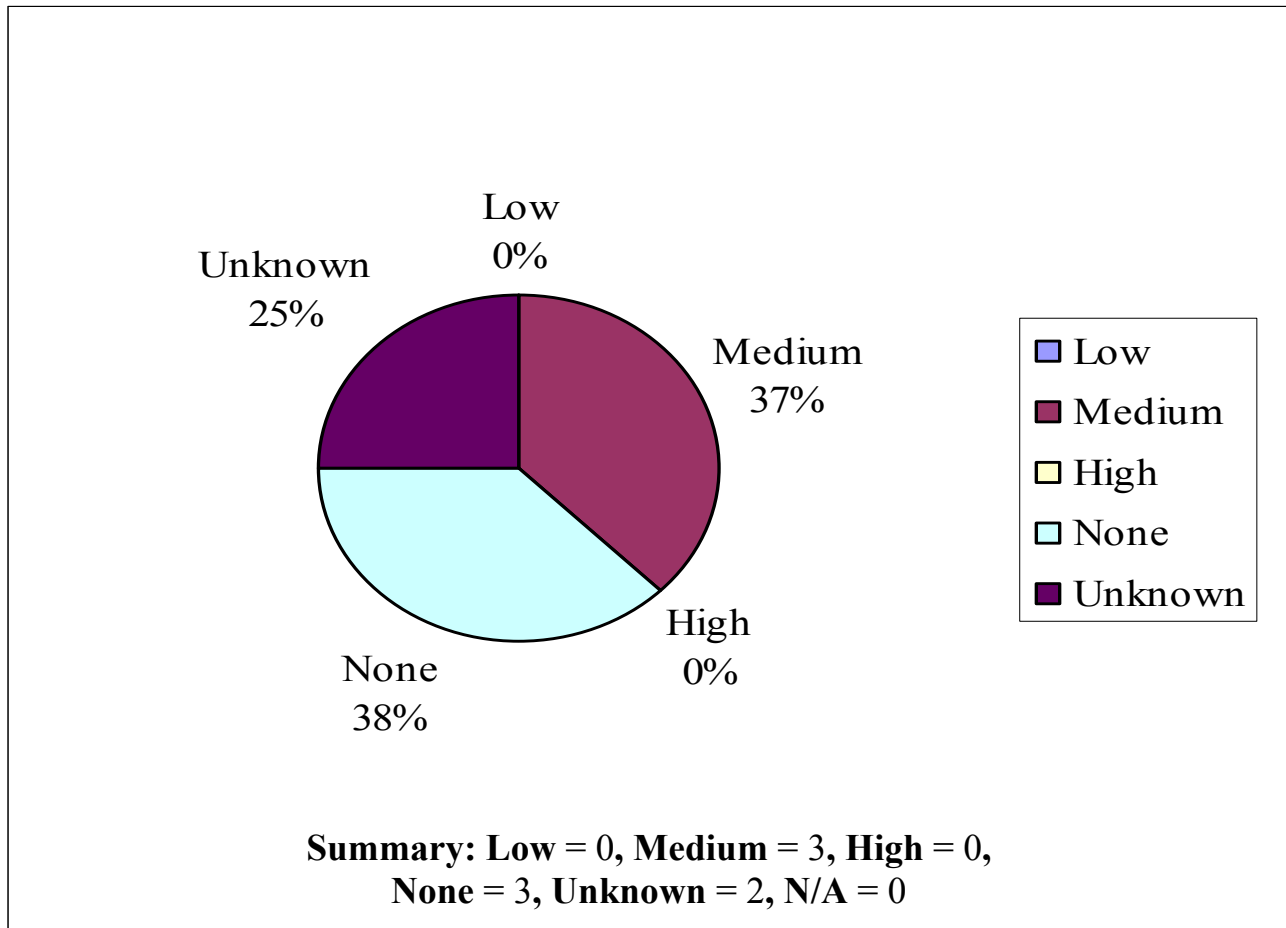
Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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REQUIREMENT O.

Jurisdictions must establish fraudulent document recognition training programs for persons engaged in the issuance of DLs/IDs.

This requirement did not result in a clear majority. 38% indicated it would be no impact, while 37% indicated medium.



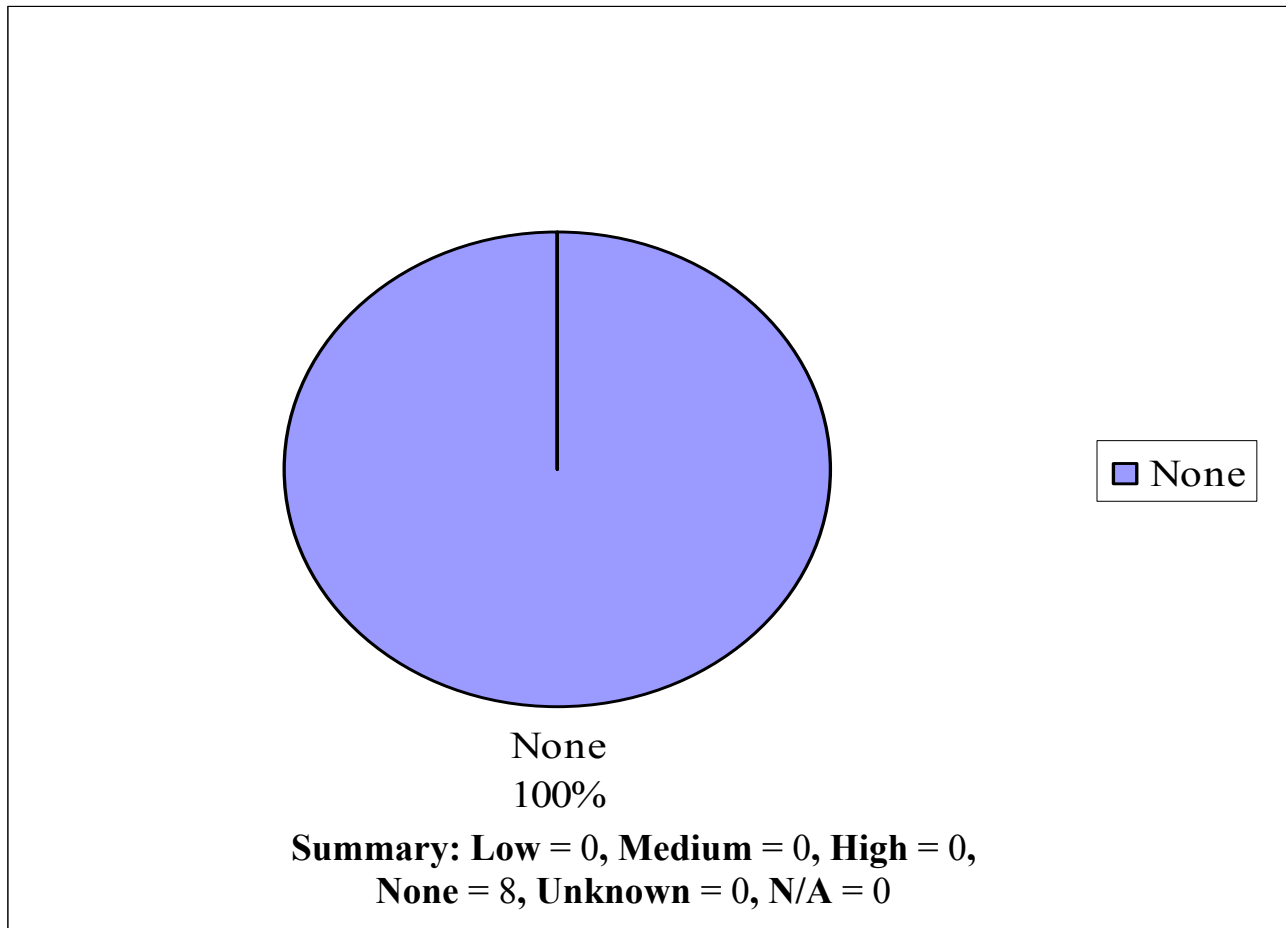
Low = Requires some policy changes **Medium** = Policy changes, computer programming **None** = Already in place
High = Major reprogramming, training, legislation/major costs **Unknown** = Need more information to determine impact
N/A = Not applicable **No Response** = No comments provided on this requirement

DRAFT

REQUIREMENT P.

The period of validity of all DLs/IDs that are not temporary is limited to a period that does not exceed 8 years.

Complete agreement that this would have no impact. All respondents have validation periods that fall within the time frames.



Low = Requires some policy changes

Medium = Policy changes, computer programming

None = Already in place

High = Major reprogramming, training, legislation/major costs

Unknown = Need more information to determine impact

N/A = Not applicable

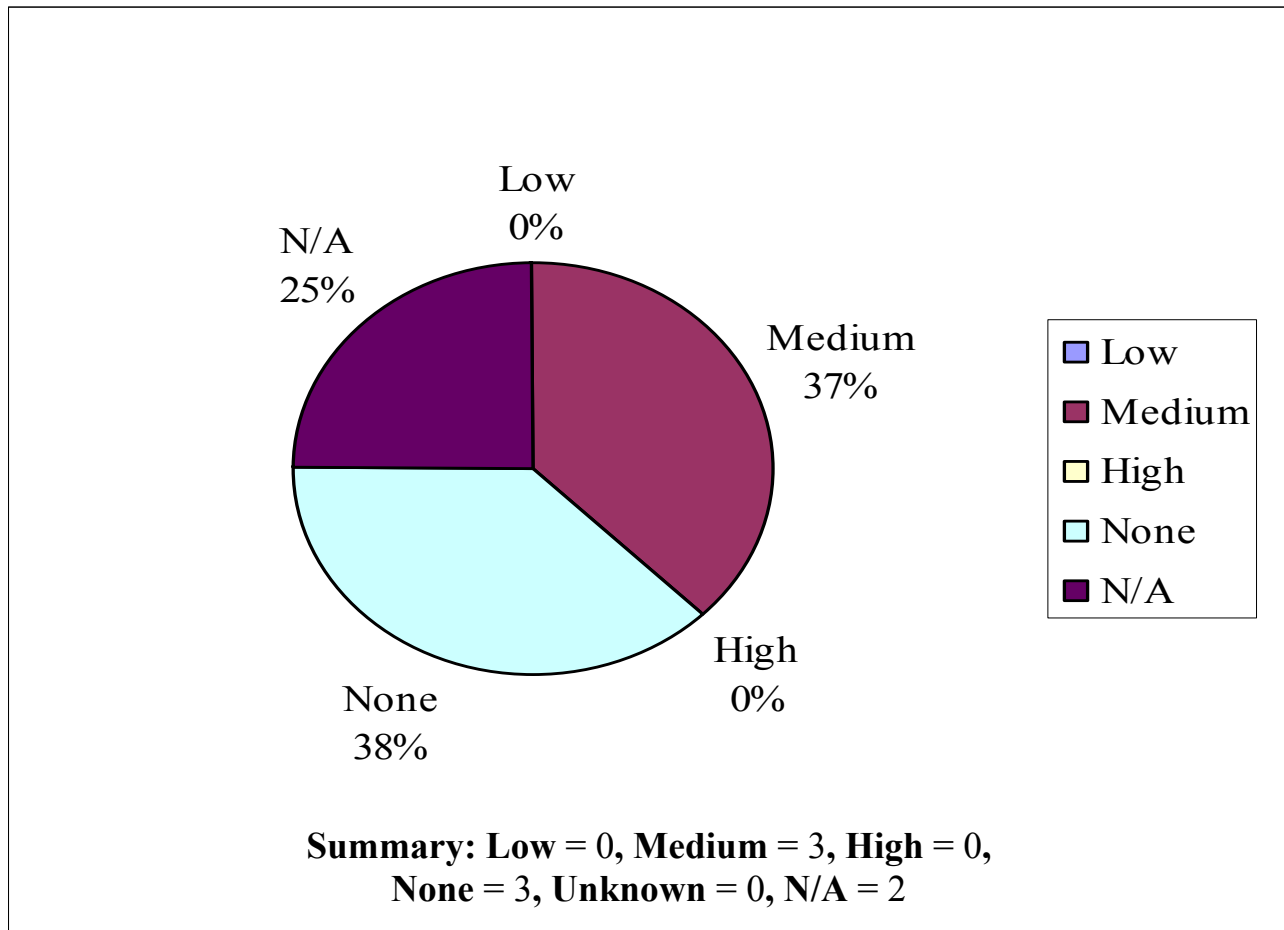
No Response = No comments provided on this requirement

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REQUIREMENT Q

Jurisdictions may issue a DL/ID that does not meet the act's requirement, but it must state on its face that it may not be accepted by any federal agency for identification or any official purpose and must use a unique design or color indicator to alert federal agency and law enforcement personnel.

70% indicated that the jurisdictions requirement may be anywhere from no to medium impact. There were a number 75% that could not indicate an impact as there was uncertainty.



Low = Requires some policy changes

Medium = Policy changes, computer programming

None = Already in place

High = Major reprogramming, training, legislation/major costs

Unknown = Need more information to determine impact

N/A = Not applicable

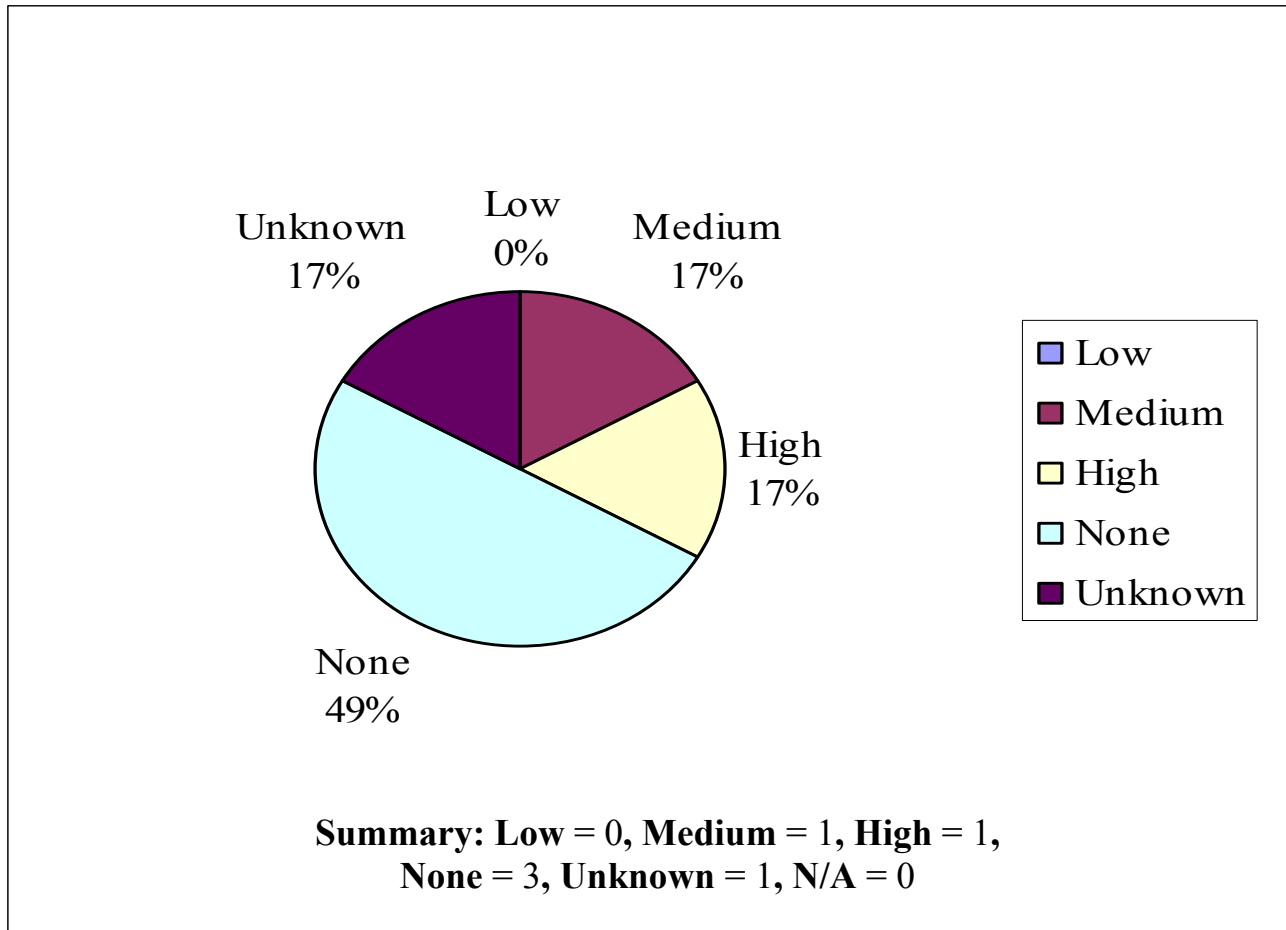
No Response = No comments provided on this requirement

DRAFT

REQUIREMENT R.

Jurisdictions must require, before issuing a DL or ID card to a person, valid documentary evidence of lawful status in the U.S.

49% indicated this would not be a problem. However, 34% indicated it would be medium to high impact – while 17% could not determine an impact without further information.



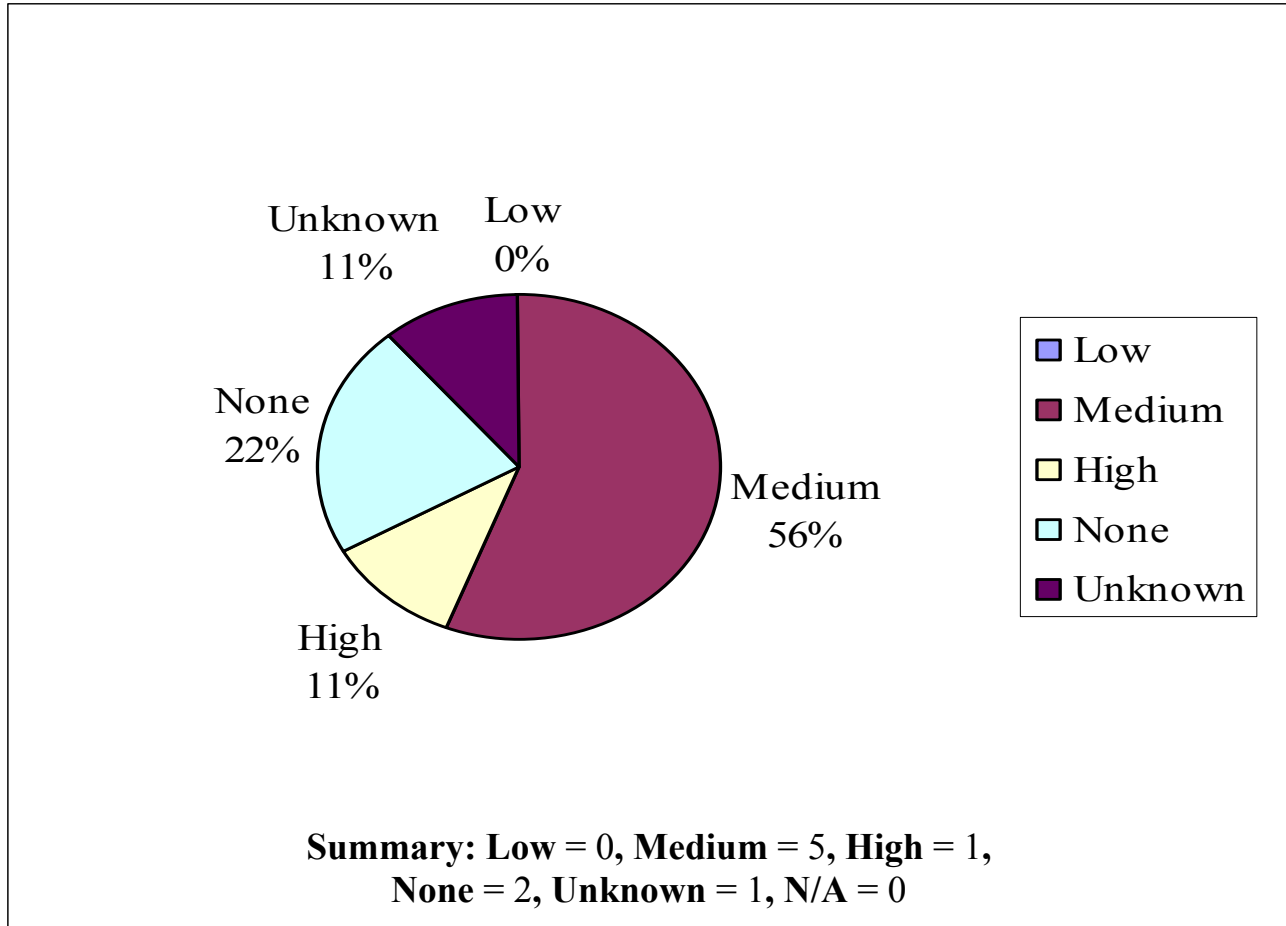
Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

DRAFT

REQUIREMENT S.

Electronic access to all other jurisdictions' MV database.

67% indicated that the impact would be medium to high.



Low = Requires some policy changes

Medium = Policy changes, computer programming

None = Already in place

High = Major reprogramming, training, legislation/major costs

Unknown = Need more information to determine impact

N/A = Not applicable

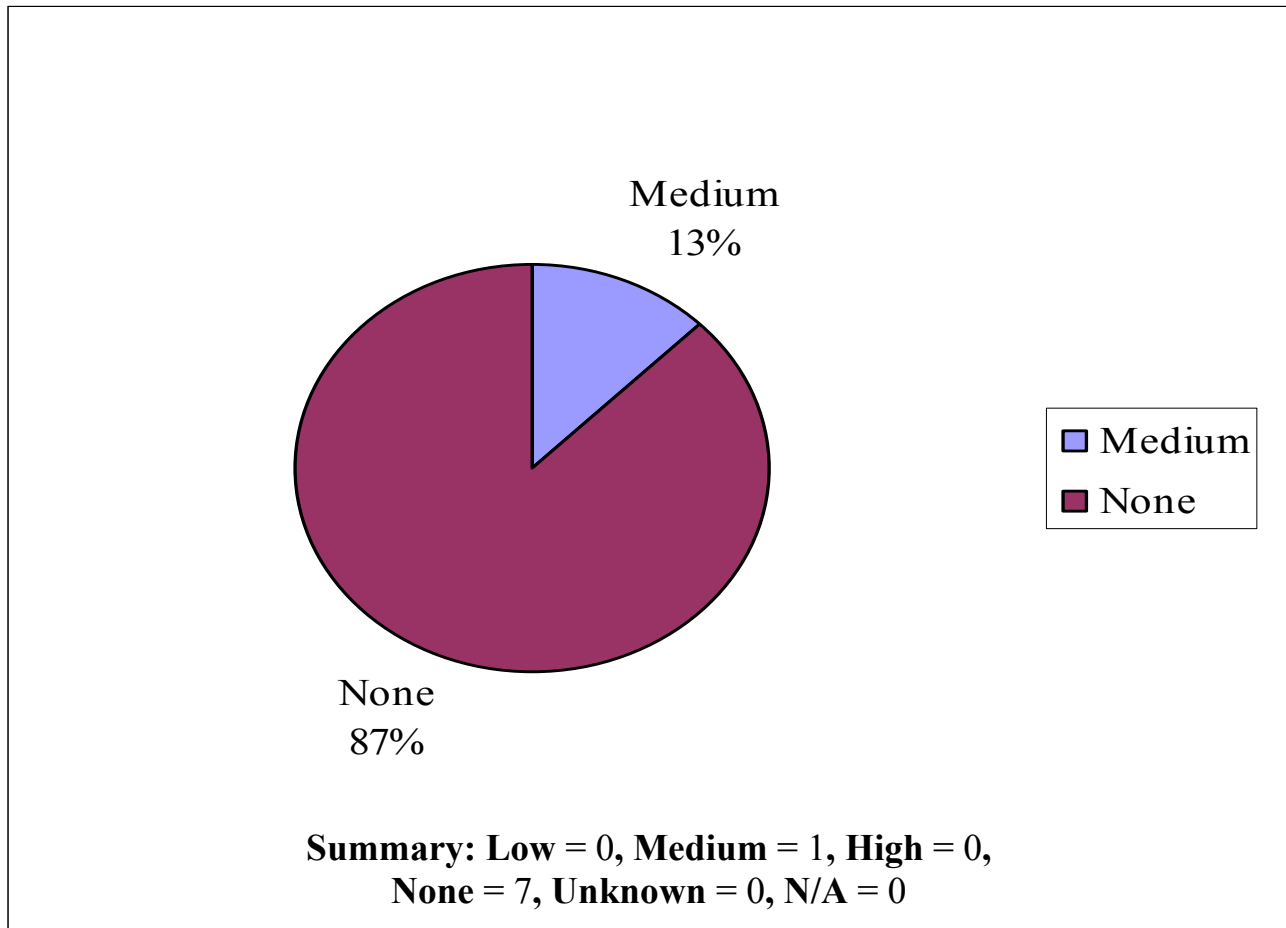
No Response = No comments provided on this requirement

DRAFT

REQUIREMENT T.

Jurisdictions must maintain a MV database that contains all data fields printed on the D/ID and driver histories, including violations, suspensions and points.

87% indicated that this would have no impact. The remaining 13% indicated medium, as some data elements would need to be added to systems.



Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

DRAFT

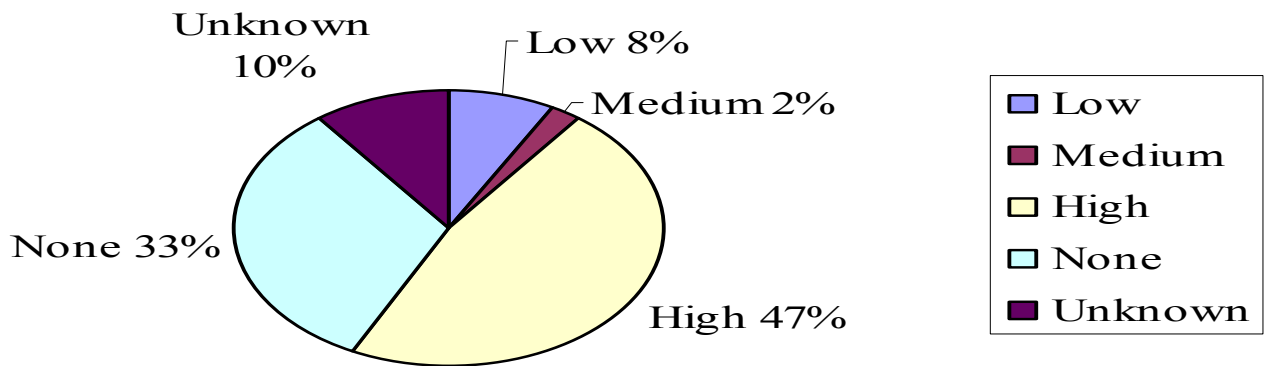
Real ID Act Impact Analysis Results

Requirement A: Introduce full legal name into driver licensing system (in record, on document).		
Jurisdiction	Impact	Comments
Alabama	HIGH	
Alaska	NONE	
American Samoa	LOW	
Arizona	HIGH	
Arkansas	HIGH	
California	UNKNOWN	
Colorado	NONE	
Connecticut	HIGH	
Delaware	HIGH	
District of Columbia	NONE	
Florida	NONE	
Georgia	NO RESPONSE	
Guam		
Hawaii	NONE	
Idaho	HIGH	
Illinois	HIGH	
Indiana	NONE	
Iowa	LOW	
Kansas	NONE	
Kentucky	HIGH	
Louisiana	UNKNOWN	
Maine	UNKNOWN	
Maryland	HIGH	
Massachusetts	HIGH	
Michigan	HIGH	
Minnesota	NONE	
Mississippi	NONE	
Missouri	HIGH	
Montana	LOW	
Nebraska	HIGH	
Nevada	NONE	
New Hampshire	UNKNOWN	
New Jersey	HIGH	
New Mexico	NONE	
New York	HIGH	
North Carolina		
North Dakota	HIGH	
Ohio	NO RESPONSE	
Oklahoma	NONE	
Oregon	NO RESPONSE	
Pennsylvania	HIGH	

DRAFT

Real ID Act Impact Analysis Results

Requirement A: Introduce full legal name into driver licensing system (in record, on document).		
Puerto Rico	NONE	
Rhode Island	NONE	
South Carolina	UNKNOWN	
South Dakota	LOW	
Tennessee	HIGH	
Texas	MEDIUM	
Utah	HIGH	
Vermont	HIGH	
Virgin Islands		
Virginia	HIGH	
Washington	HIGH	
West Virginia	NONE	
Wisconsin	HIGH	
Wyoming	NONE	



Summary: Low = 4, Medium = 1, High = 23, None = 16, Unknown = 5

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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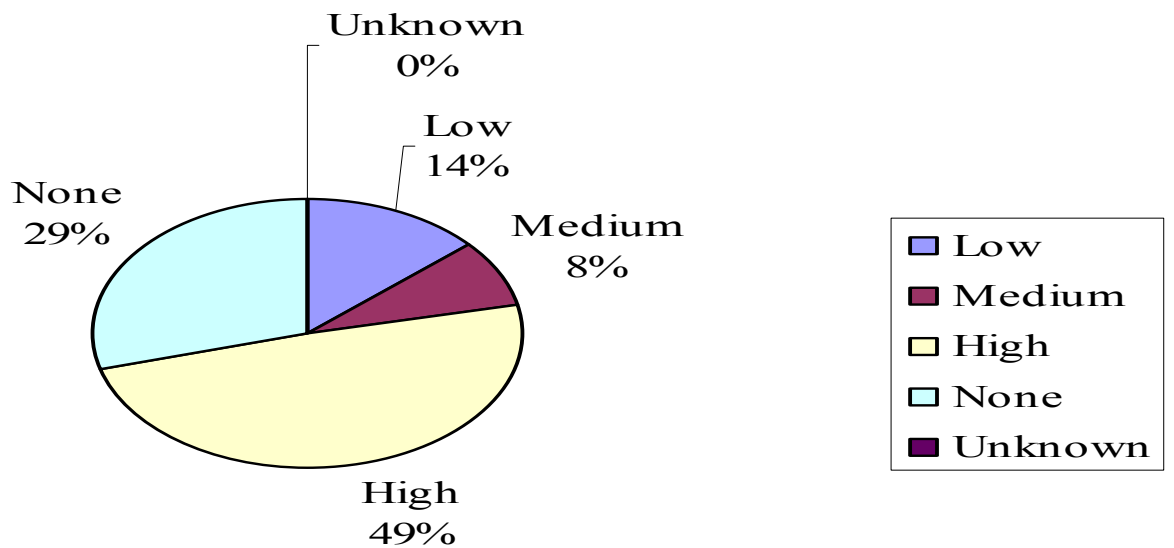
Real ID Act Impact Analysis Results

Requirement B: Have following data elements/features on the document. (See detailed appendix)		
Jurisdiction	Impact	Comments
Alabama	HIGH	
Alaska	NONE	
American Samoa	LOW	
Arizona	HIGH	
Arkansas	HIGH	
California	NONE	
Colorado	NONE	
Connecticut	NONE	
Delaware	HIGH	
District of Columbia	LOW	
Florida	MEDIUM	
Georgia	HIGH	
Guam		
Hawaii	NONE	
Idaho	HIGH	
Illinois	HIGH	
Indiana	LOW	
Iowa	LOW	
Kansas	NONE	
Kentucky	NONE	
Louisiana	NONE	
Maine	MEDIUM	
Maryland	HIGH	
Massachusetts	HIGH	
Michigan	HIGH	
Minnesota	NONE	
Mississippi	NONE	
Missouri	HIGH	
Montana	LOW	
Nebraska	HIGH	
Nevada	HIGH	
New Hampshire	HIGH	
New Jersey	HIGH	
New Mexico	NONE	
New York	HIGH	
North Carolina		
North Dakota	HIGH	
Ohio	LOW	
Oklahoma	NONE	
Oregon	MEDIUM	
Pennsylvania	HIGH	
Puerto Rico	HIGH	

DRAFT

Real ID Act Impact Analysis Results

Requirement B: Have following data elements/features on the document. (See detailed appendix)		
Rhode Island	NONE	
South Carolina	NONE	
South Dakota	LOW	
Tennessee	HIGH	
Texas	MEDIUM	
Utah	HIGH	
Vermont	HIGH	
Virgin Islands		
Virginia	HIGH	
Washington	HIGH	
West Virginia	NONE	
Wisconsin	HIGH	
Wyoming	LOW	



Summary: Low = 7, Medium = 4, High = 25, None = 15, Unknown = 0

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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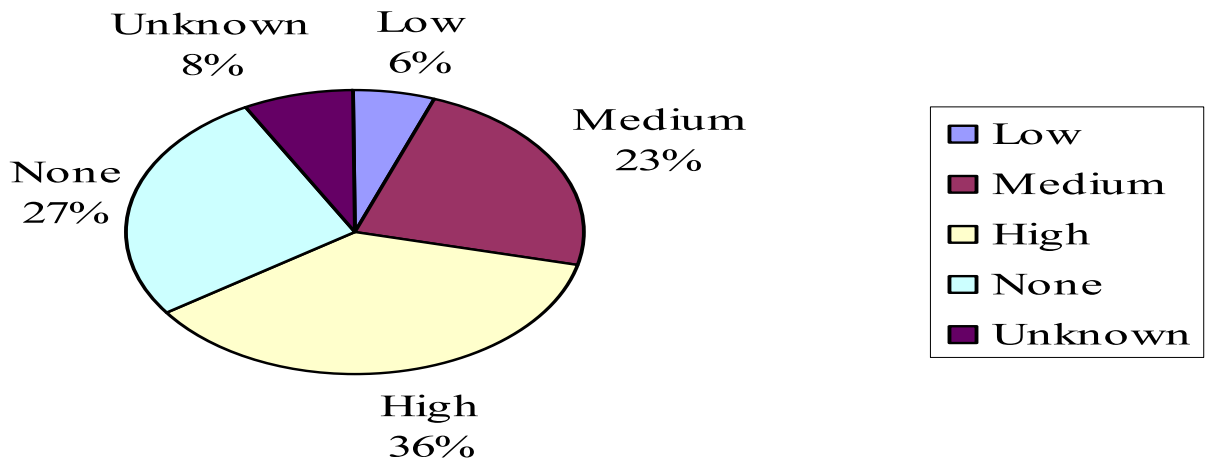
Real ID Act Impact Analysis Results

Requirement C: Introduce temporary DL/ID cards and tying end of stay to expiration of DL/ID card (or issuance for no more than 1 year).		
Jurisdiction	Impact	Comments
Alabama	NONE	
Alaska	HIGH	
American Samoa	HIGH	
Arizona	HIGH	
Arkansas	UNKNOWN	
California	HIGH	
Colorado	NONE	
Connecticut	HIGH	
Delaware	HIGH	
District of Columbia	HIGH	
Florida	UNKNOWN	
Georgia	NONE	
Guam		
Hawaii	HIGH	
Idaho	HIGH	
Illinois	HIGH	
Indiana	MEDIUM	
Iowa	MEDIUM	
Kansas	MEDIUM	
Kentucky	NONE	
Louisiana	NONE	
Maine	MEDIUM	
Maryland	MEDIUM	
Massachusetts	MEDIUM	
Michigan	HIGH	
Minnesota	NONE	
Mississippi	MEDIUM	
Missouri	LOW	
Montana	LOW	
Nebraska	HIGH	
Nevada	MEDIUM	
New Hampshire	UNKNOWN	
New Jersey	NONE	
New Mexico	HIGH	
New York	HIGH	
North Carolina		
North Dakota	MEDIUM	
Ohio	NONE	
Oklahoma	NONE	
Oregon	HIGH	
Pennsylvania	NONE	

DRAFT

Real ID Act Impact Analysis Results

Requirement C: Introduce temporary DL/ID cards and tying end of stay to expiration of DL/ID card (or issuance for no more than 1 year).		
Puerto Rico	HIGH	
Rhode Island	HIGH	
South Carolina	NONE	
South Dakota	LOW	
Tennessee	MEDIUM	
Texas	MEDIUM	
Utah	MEDIUM	
Vermont	NONE	
Virgin Islands		
Virginia	UNKNOWN	
Washington	HIGH	
West Virginia	NONE	
Wisconsin	HIGH	
Wyoming	NONE	



Summary: Low = 3, Medium = 12, High = 19, None = 14, Unknown = 4

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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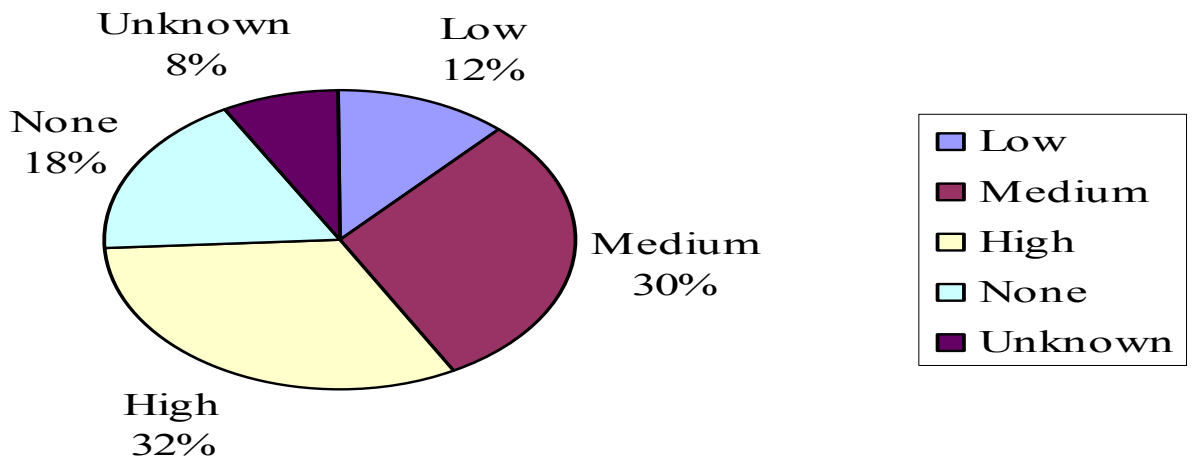
Real ID Act Impact Analysis Results

Requirement D: Amending card design to show/indicate that it is a temporary document with a “different than usually” expiration data.		
Jurisdiction	Impact	Comments
Alabama	LOW	
Alaska	HIGH	
American Samoa	HIGH	
Arizona	HIGH	
Arkansas	UNKNOWN	
California	LOW	
Colorado	HIGH	
Connecticut	HIGH	
Delaware	HIGH	
District of Columbia	HIGH	
Florida	NONE	
Georgia	UNKNOWN	
Guam		
Hawaii	HIGH	
Idaho	MEDIUM	
Illinois	HIGH	
Indiana	MEDIUM	
Iowa	MEDIUM	
Kansas	MEDIUM	
Kentucky	LOW	
Louisiana	NONE	
Maine	MEDIUM	
Maryland	NONE	
Massachusetts	MEDIUM	
Michigan	NO RESPONSE	
Minnesota	NONE	
Mississippi	NONE	
Missouri	LOW	
Montana	LOW	
Nebraska	NO RESPONSE	
Nevada	HIGH	
New Hampshire	UNKNOWN	
New Jersey	HIGH	
New Mexico	HIGH	
New York	NONE	
North Carolina		
North Dakota	MEDIUM	
Ohio	NONE	
Oklahoma	LOW	
Oregon	UNKNOWN	
Pennsylvania	MEDIUM	

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Real ID Act Impact Analysis Results

Requirement D: Amending card design to show/indicate that it is a temporary document with a “different than usually” expiration data.		
Puerto Rico	HIGH	
Rhode Island	HIGH	
South Carolina	MEDIUM	
South Dakota	MEDIUM	
Tennessee	MEDIUM	
Texas	MEDIUM	
Utah	MEDIUM	
Vermont	HIGH	
Virgin Islands		
Virginia	MEDIUM	
Washington	MEDIUM	
West Virginia	NONE	
Wisconsin	HIGH	
Wyoming	NONE	



Summary: Low = 6, Medium = 15, High = 16, None = 9, Unknown = 4

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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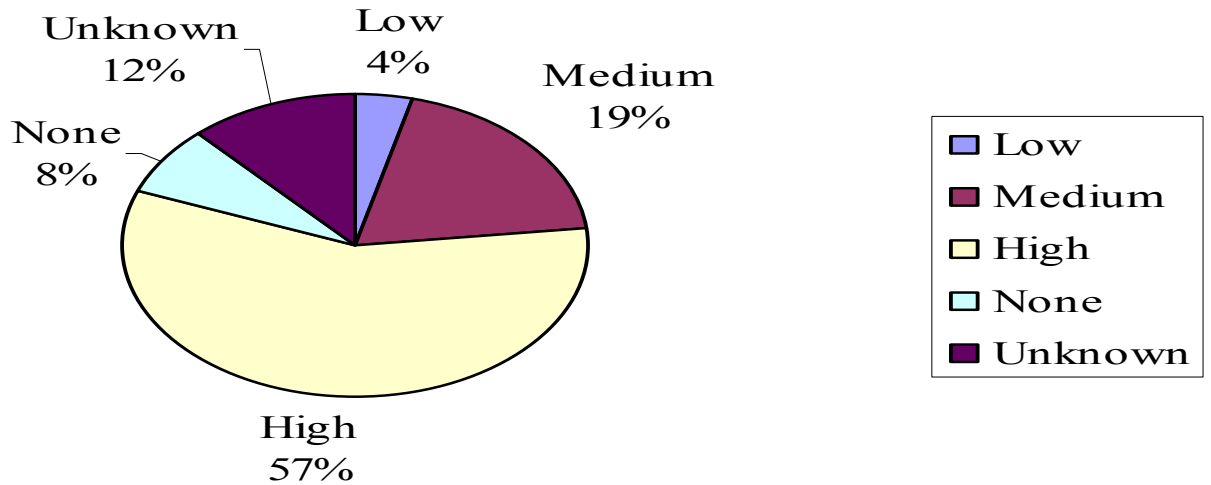
Real ID Act Impact Analysis Results

Requirement E: Verification at Source: Enabling your system to electronically verify documentation with. (See detailed appendix)		
Jurisdiction	Impact	Comments
Alabama	LOW	
Alaska	HIGH	
American Samoa	HIGH	
Arizona	HIGH	
Arkansas	HIGH	
California	HIGH	
Colorado	HIGH	
Connecticut	HIGH	
Delaware	HIGH	
District of Columbia	HIGH	
Florida	NONE	
Georgia	HIGH	
Guam		
Hawaii	HIGH	
Idaho	HIGH	
Illinois	HIGH	
Indiana	HIGH	
Iowa	HIGH	
Kansas	HIGH	
Kentucky	HIGH	
Louisiana	MEDIUM	
Maine	HIGH	
Maryland	MEDIUM	
Massachusetts	MEDIUM	
Michigan	MEDIUM	
Minnesota	UNKNOWN	
Mississippi	MEDIUM	
Missouri	HIGH	
Montana	LOW	
Nebraska	UNKNOWN	
Nevada	HIGH	
New Hampshire	MEDIUM	
New Jersey	NONE	
New Mexico	HIGH	
New York	MEDIUM	
North Carolina		
North Dakota	MEDIUM	
Ohio	MEDIUM	
Oklahoma	HIGH	
Oregon	UNKNOWN	
Pennsylvania	NONE	

DRAFT

Real ID Act Impact Analysis Results

Requirement E: Verification at Source: Enabling your system to electronically verify documentation with. (See detailed appendix)		
Puerto Rico	HIGH	
Rhode Island	HIGH	
South Carolina	UNKNOWN	
South Dakota	UNKNOWN	
Tennessee	MEDIUM	
Texas	HIGH	
Utah	NONE	
Vermont	HIGH	
Virgin Islands		
Virginia	HIGH	
Washington	HIGH	
West Virginia	UNKNOWN	
Wisconsin	HIGH	
Wyoming	HIGH	



Summary: Low = 2, Medium = 10, High = 30, None = 4, Unknown = 6

Low = Requires some policy changes **Medium** = Policy changes, computer programming **None** = Already in place
High = Major reprogramming, training, legislation/major costs **Unknown** = Need more information to determine impact
N/A = Not applicable **No Response** = No comments provided on this requirement

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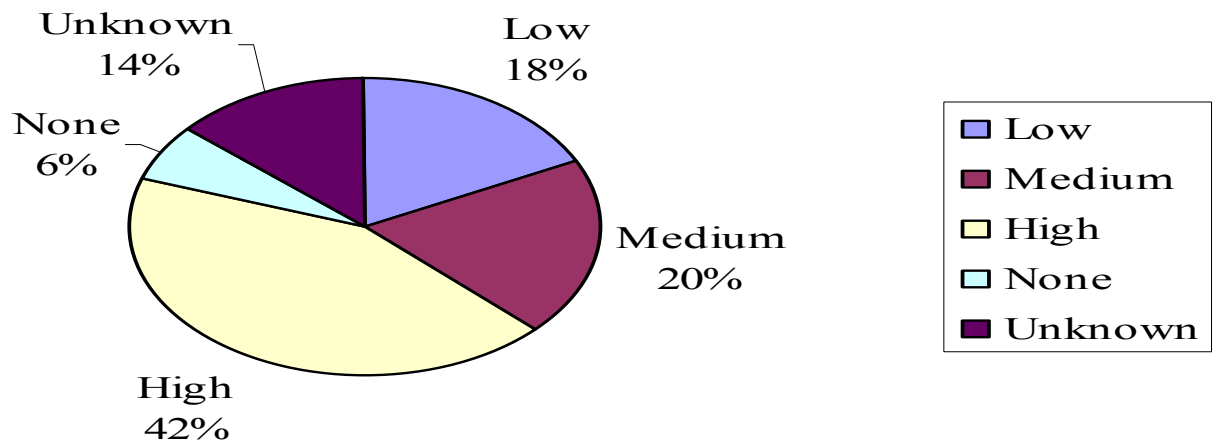
Real ID Act Impact Analysis Results

Requirement F: Developing access capability to SAVE system.		
Jurisdiction	Impact	Comments
Alabama	LOW	
Alaska	HIGH	
American Samoa	HIGH	
Arizona	HIGH	
Arkansas	MEDIUM	
California	LOW	
Colorado	NONE	
Connecticut	NO RESPONSE	
Delaware	HIGH	
District of Columbia	HIGH	
Florida	NONE	
Georgia	HIGH	
Guam		
Hawaii	HIGH	
Idaho	HIGH	
Illinois	HIGH	
Indiana	LOW	
Iowa	LOW	
Kansas	MEDIUM	
Kentucky	HIGH	
Louisiana	UNKNOWN	
Maine	HIGH	
Maryland	MEDIUM	
Massachusetts	MEDIUM	
Michigan	UNKNOWN	
Minnesota	MEDIUM	
Mississippi	MEDIUM	
Missouri	HIGH	
Montana	LOW	
Nebraska	LOW	
Nevada	NONE	
New Hampshire	MEDIUM	
New Jersey	HIGH	
New Mexico	HIGH	
New York	MEDIUM	
North Carolina		
North Dakota	LOW	
Ohio	MEDIUM	
Oklahoma	HIGH	
Oregon	UNKNOWN	
Pennsylvania	UNKNOWN	
Puerto Rico	HIGH	

DRAFT

Real ID Act Impact Analysis Results

Requirement F: Developing access capability to SAVE system.		
Rhode Island	HIGH	
South Carolina	UNKNOWN	
South Dakota	LOW	
Tennessee	LOW	
Texas	HIGH	
Utah	UNKNOWN	
Vermont	HIGH	
Virgin Islands		
Virginia	HIGH	
Washington	HIGH	
West Virginia	UNKNOWN	
Wisconsin	HIGH	
Wyoming	MEDIUM	



Summary: Low = 9, Medium = 10, High = 22, None = 3, Unknown = 7

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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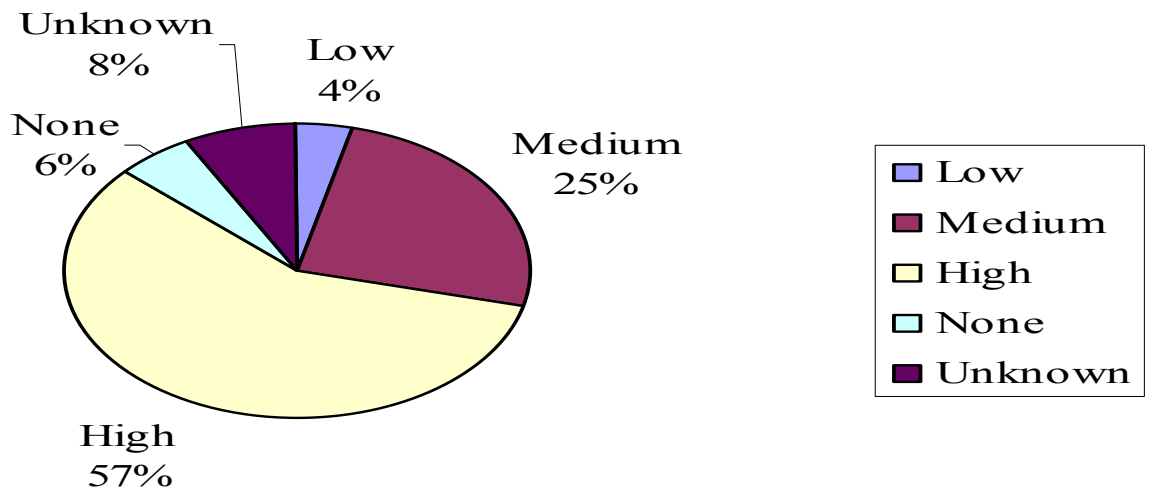
Real ID Act Impact Analysis Results

Requirement G: Introduce equipment into system to capture digital images of identity source documents so that images can be retained in electronic storage in a transferable format.		
Jurisdiction	Impact	Comments
Alabama	HIGH	
Alaska	HIGH	
American Samoa	MEDIUM	
Arizona	HIGH	
Arkansas	HIGH	
California	HIGH	
Colorado	HIGH	
Connecticut	HIGH	
Delaware	HIGH	
District of Columbia	HIGH	
Florida	NONE	
Georgia	HIGH	
Guam		
Hawaii	HIGH	
Idaho	HIGH	
Illinois	HIGH	
Indiana	HIGH	
Iowa	NONE	
Kansas	LOW	
Kentucky	HIGH	
Louisiana	NONE	
Maine	HIGH	
Maryland	MEDIUM	
Massachusetts	HIGH	
Michigan	MEDIUM	
Minnesota	UNKNOWN	
Mississippi	HIGH	
Missouri	HIGH	
Montana	HIGH	
Nebraska	HIGH	
Nevada	HIGH	
New Hampshire	MEDIUM	
New Jersey	HIGH	
New Mexico	HIGH	
New York	HIGH	
North Carolina		
North Dakota	MEDIUM	
Ohio	HIGH	
Oklahoma	HIGH	
Oregon	UNKNOWN	

DRAFT

Real ID Act Impact Analysis Results

Requirement G: Introduce equipment into system to capture digital images of identity source documents so that images can be retained in electronic storage in a transferable format.		
Pennsylvania	HIGH	
Puerto Rico	MEDIUM	
Rhode Island	MEDIUM	
South Carolina	UNKNOWN	
South Dakota	MEDIUM	
Tennessee	UNKNOWN	
Texas	LOW	
Utah	MEDIUM	
Vermont	HIGH	
Virgin Islands		
Virginia	MEDIUM	
Washington	MEDIUM	
West Virginia	MEDIUM	
Wisconsin	HIGH	
Wyoming	MEDIUM	



Summary: Low = 2, Medium = 13, High = 30, None = 3, Unknown = 4

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

DRAFT

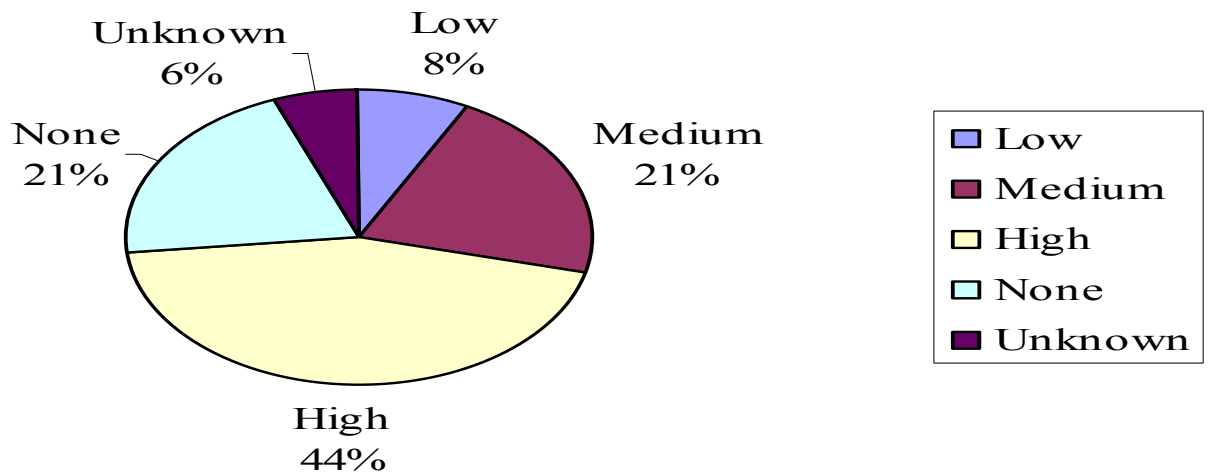
Real ID Act Impact Analysis Results

Requirement H: Retain paper copies of source documents for a minimum of 7 years or images of source documents presented for a minimum of 10 years.		
Jurisdiction	Impact	Comments
Alabama	HIGH	
Alaska	HIGH	
American Samoa	HIGH	
Arizona	HIGH	
Arkansas	HIGH	
California	HIGH	
Colorado	HIGH	
Connecticut	HIGH	
Delaware	NONE	
District of Columbia	HIGH	
Florida	HIGH	
Georgia	HIGH	
Guam		
Hawaii	HIGH	
Idaho	NONE	
Illinois	HIGH	
Indiana	LOW	
Iowa	UNKNOWN	
Kansas	LOW	
Kentucky	HIGH	
Louisiana	NONE	
Maine	NONE	
Maryland	MEDIUM	
Massachusetts	NONE	
Michigan	MEDIUM	
Minnesota	MEDIUM	
Mississippi	NONE	
Missouri	HIGH	
Montana	HIGH	
Nebraska	UNKNOWN	
Nevada	HIGH	
New Hampshire	NONE	
New Jersey	HIGH	
New Mexico	HIGH	
New York	HIGH	
North Carolina		
North Dakota	MEDIUM	
Ohio	MEDIUM	
Oklahoma	NONE	
Oregon	UNKNOWN	
Pennsylvania	HIGH	

DRAFT

Real ID Act Impact Analysis Results

Requirement H: Retain paper copies of source documents for a minimum of 7 years or images of source documents presented for a minimum of 10 years.		
Puerto Rico	NONE	
Rhode Island	MEDIUM	
South Carolina	MEDIUM	
South Dakota	MEDIUM	
Tennessee	NONE	
Texas	LOW	
Utah	MEDIUM	
Vermont	NONE	
Virgin Islands		
Virginia	MEDIUM	
Washington	HIGH	
West Virginia	LOW	
Wisconsin	HIGH	
Wyoming	MEDIUM	



Summary: Low = 4, Medium = 11, High = 23, None = 11, Unknown = 3

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

DRAFT

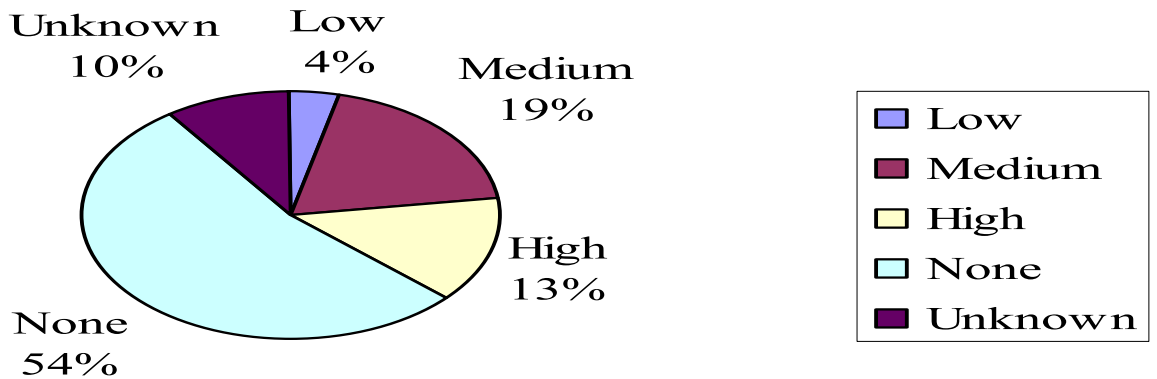
Real ID Act Impact Analysis Results

Requirement I: Subject each person applying for a driver's license or identification card to mandatory facial image capture.		
Jurisdiction	Impact	Comments
Alabama	NONE	
Alaska	NONE	
American Samoa	MEDIUM	
Arizona	HIGH	
Arkansas	LOW	
California	NONE	
Colorado	UNKNOWN	
Connecticut	NONE	
Delaware	NONE	
District of Columbia	HIGH	
Florida	NONE	
Georgia	HIGH	
Guam		
Hawaii	UNKNOWN	
Idaho	UNKNOWN	
Illinois	UNKNOWN	
Indiana	MEDIUM	
Iowa	NONE	
Kansas	NONE	
Kentucky	HIGH	
Louisiana	NONE	
Maine	NONE	
Maryland	NONE	
Massachusetts	NONE	
Michigan	HIGH	
Minnesota	NONE	
Mississippi	NONE	
Missouri	MEDIUM	
Montana	NONE	
Nebraska	HIGH	
Nevada	NONE	
New Hampshire	NONE	
New Jersey	NONE	
New Mexico	NONE	
New York	NONE	
North Carolina		
North Dakota	NONE	
Ohio	MEDIUM	
Oklahoma	NONE	
Oregon	LOW	
Pennsylvania	NONE	

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Real ID Act Impact Analysis Results

Requirement I: Subject each person applying for a driver's license or identification card to mandatory facial image capture.		
Puerto Rico	HIGH	
Rhode Island	NONE	
South Carolina	NONE	
South Dakota	MEDIUM	
Tennessee	MEDIUM	
Texas	MEDIUM	
Utah	NONE	
Vermont	UNKNOWN	
Virgin Islands		
Virginia	NONE	
Washington	MEDIUM	
West Virginia	NONE	
Wisconsin	MEDIUM	
Wyoming	MEDIUM	



Summary: Low = 2, Medium = 10, High = 7, None = 28, Unknown = 5

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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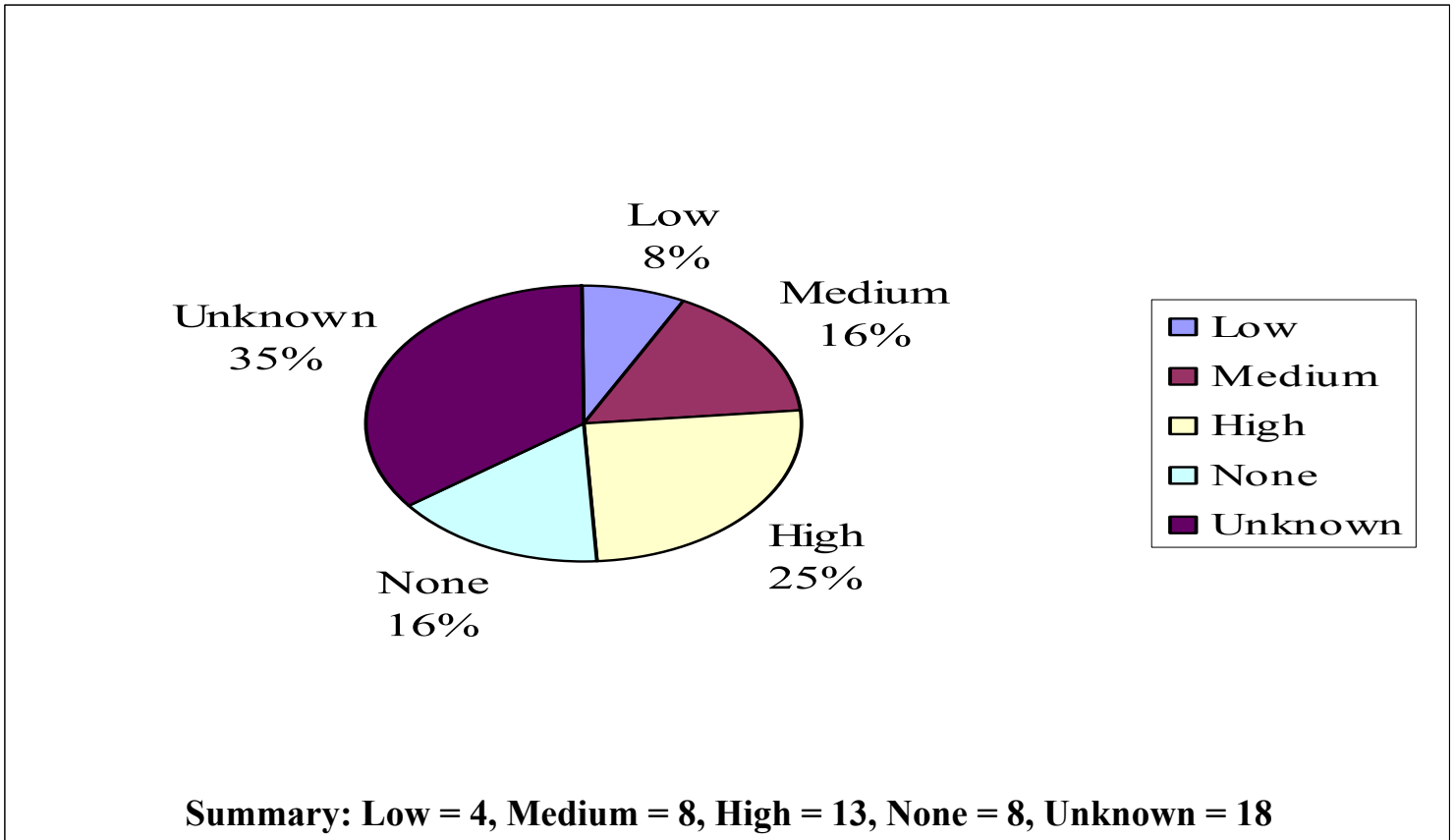
Real ID Act Impact Analysis Results

Requirement J: Establish an effective procedure to confirm or verify a renewing applicant's information.		
Jurisdiction	Impact	Comments
Alabama	UNKNOWN	
Alaska	NONE	
American Samoa	MEDIUM	
Arizona	HIGH	
Arkansas	HIGH	
California	UNKNOWN	
Colorado	HIGH	
Connecticut	HIGH	
Delaware	HIGH	
District of Columbia	HIGH	
Florida	NONE	
Georgia	HIGH	
Guam		
Hawaii	HIGH	
Idaho	NONE	
Illinois	NO RESPONSE	
Indiana	LOW	
Iowa	UNKNOWN	
Kansas	NONE	
Kentucky	HIGH	
Louisiana	NONE	
Maine	UNKNOWN	
Maryland	MEDIUM	
Massachusetts	UNKNOWN	
Michigan	MEDIUM	
Minnesota	UNKNOWN	
Mississippi	NONE	
Missouri	UNKNOWN	
Montana	LOW	
Nebraska	UNKNOWN	
Nevada	HIGH	
New Hampshire	NONE	
New Jersey	LOW	
New Mexico	UNKNOWN	
New York	MEDIUM	
North Carolina		
North Dakota	UNKNOWN	
Ohio	MEDIUM	
Oklahoma	UNKNOWN	
Oregon	NONE	
Pennsylvania	UNKNOWN	

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Real ID Act Impact Analysis Results

Requirement J: Establish an effective procedure to confirm or verify a renewing applicant's information.		
Puerto Rico	HIGH	
Rhode Island	UNKNOWN	
South Carolina	MEDIUM	
South Dakota	UNKNOWN	
Tennessee	UNKNOWN	
Texas	LOW	
Utah	MEDIUM	
Vermont	UNKNOWN	
Virgin Islands		
Virginia	HIGH	
Washington	HIGH	
West Virginia	UNKNOWN	
Wisconsin	UNKNOWN	
Wyoming	MEDIUM	



Low = Requires some policy changes **Medium** = Policy changes, computer programming **None** = Already in place
High = Major reprogramming, training, legislation/major costs **Unknown** = Need more information to determine impact
N/A = Not applicable **No Response** = No comments provided on this requirement

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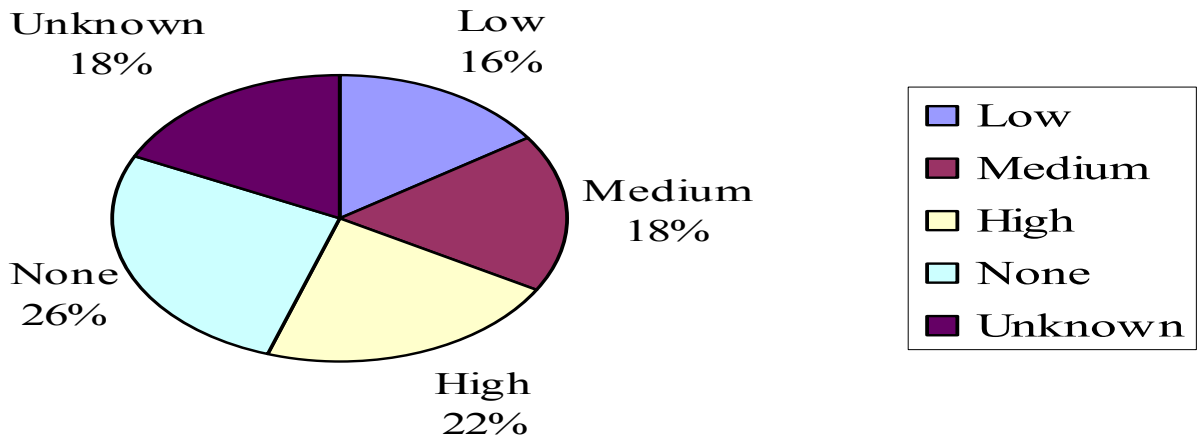
Real ID Act Impact Analysis Results

Requirement K: In the event that a social security account number is already registered to or associated with another person to which any state has issued a DL/ID card, the state shall resolve the discrepancy and take appropriate action.		
Jurisdiction	Impact	Comments
Alabama	HIGH	
Alaska	HIGH	
American Samoa	HIGH	
Arizona	HIGH	
Arkansas	MEDIUM	
California	UNKNOWN	
Colorado	NONE	
Connecticut	HIGH	
Delaware	HIGH	
District of Columbia	HIGH	
Florida	NONE	
Georgia	HIGH	
Guam		
Hawaii	UNKNOWN	
Idaho	NONE	
Illinois	NO RESPONSE	
Indiana	LOW	
Iowa	LOW	
Kansas	LOW	
Kentucky	LOW	
Louisiana	NONE	
Maine	NONE	
Maryland	MEDIUM	
Massachusetts	NONE	
Michigan	MEDIUM	
Minnesota	LOW	
Mississippi	NONE	
Missouri	HIGH	
Montana	LOW	
Nebraska	UNKNOWN	
Nevada	MEDIUM	
New Hampshire	NONE	
New Jersey	LOW	
New Mexico	UNKNOWN	
New York	NONE	
North Carolina		
North Dakota	NONE	
Ohio	MEDIUM	
Oklahoma	UNKNOWN	
Oregon	UNKNOWN	

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Real ID Act Impact Analysis Results

Requirement K: In the event that a social security account number is already registered to or associated with another person to which any state has issued a DL/ID card, the state shall resolve the discrepancy and take appropriate action.		
Pennsylvania	UNKNOWN	
Puerto Rico	HIGH	
Rhode Island	NONE	
South Carolina	MEDIUM	
South Dakota	NONE	
Tennessee	MEDIUM	
Texas	MEDIUM	
Utah	MEDIUM	
Vermont	UNKNOWN	
Virgin Islands		
Virginia	HIGH	
Washington	NONE	
West Virginia	NONE	
Wisconsin	UNKNOWN	
Wyoming	LOW	



Summary: Low = 8, Medium = 9, High = 11, None = 14, Unknown = 9

Low = Requires some policy changes **Medium** = Policy changes, computer programming **None** = Already in place
High = Major reprogramming, training, legislation/major costs **Unknown** = Need more information to determine impact
N/A = Not applicable **No Response** = No comments provided on this requirement

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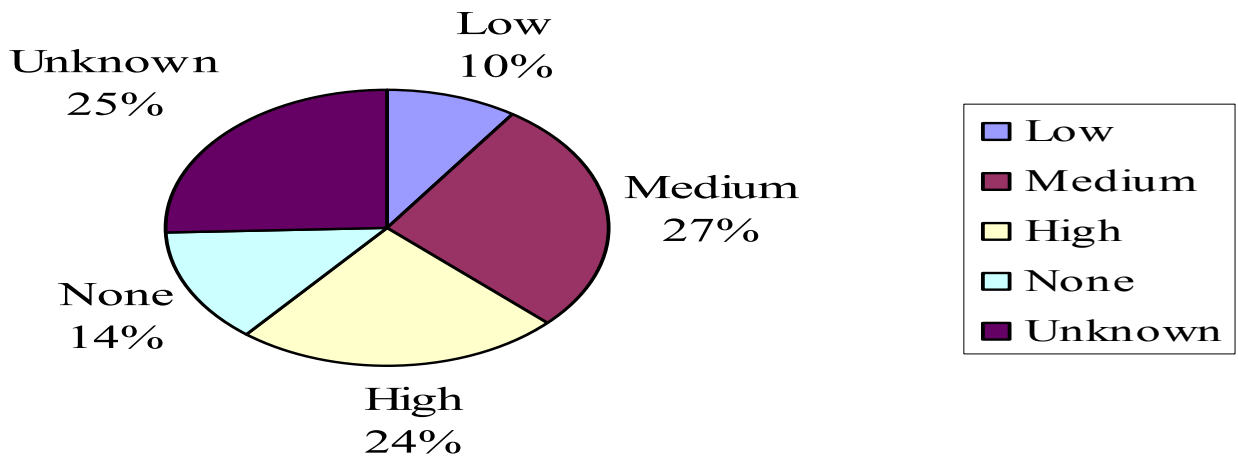
Real ID Act Impact Analysis Results

Requirement L: Check other states if a person already was issued a DL in another state.		
Jurisdiction	Impact	Comments
Alabama	NONE	
Alaska	MEDIUM	
American Samoa	HIGH	
Arizona	MEDIUM	
Arkansas	MEDIUM	
California	UNKNOWN	
Colorado	HIGH	
Connecticut	HIGH	
Delaware	NONE	
District of Columbia	UNKNOWN	
Florida	NONE	
Georgia	HIGH	
Guam		
Hawaii	HIGH	
Idaho	MEDIUM	
Illinois	NO RESPONSE	
Indiana	UNKNOWN	
Iowa	LOW	
Kansas	LOW	
Kentucky	UNKNOWN	
Louisiana	LOW	
Maine	NONE	
Maryland	MEDIUM	
Massachusetts	UNKNOWN	
Michigan	MEDIUM	
Minnesota	HIGH	
Mississippi	MEDIUM	
Missouri	HIGH	
Montana	MEDIUM	
Nebraska	UNKNOWN	
Nevada	NONE	
New Hampshire	NONE	
New Jersey	HIGH	
New Mexico	HIGH	
New York	MEDIUM	
North Carolina		
North Dakota	UNKNOWN	
Ohio	MEDIUM	
Oklahoma	UNKNOWN	
Oregon	UNKNOWN	
Pennsylvania	HIGH	
Puerto Rico	HIGH	

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Real ID Act Impact Analysis Results

Requirement L: Check other states if a person already was issued a DL in another state.		
Rhode Island	NONE	
South Carolina	UNKNOWN	
South Dakota	UNKNOWN	
Tennessee	LOW	
Texas	MEDIUM	
Utah	MEDIUM	
Vermont	UNKNOWN	
Virgin Islands		
Virginia	HIGH	
Washington	MEDIUM	
West Virginia	LOW	
Wisconsin	UNKNOWN	
Wyoming	MEDIUM	



Summary: Low = 5, Medium = 14, High = 12, None = 7, Unknown = 13

Low = Requires some policy changes **Medium** = Policy changes, computer programming **None** = Already in place
High = Major reprogramming, training, legislation/major costs **Unknown** = Need more information to determine impact
N/A = Not applicable **No Response** = No comments provided on this requirement

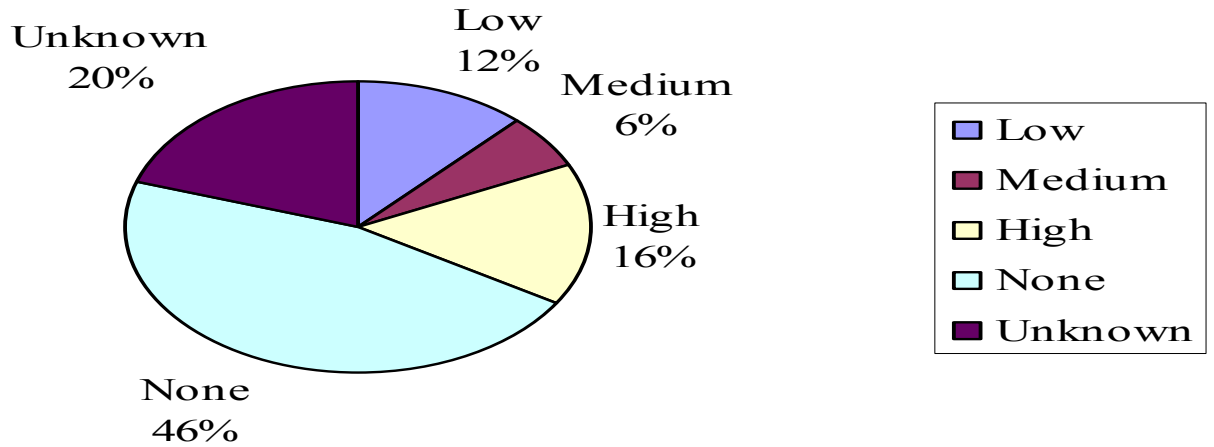
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Real ID Act Impact Analysis Results

Requirement M: Ensure physical security of locations where DL/ID cards are produced.		
Jurisdiction	Impact	Comments
Alabama	MEDIUM	
Alaska	NONE	
American Samoa	HIGH	
Arizona	NONE	
Arkansas	LOW	
California	LOW	
Colorado	NONE	
Connecticut	NONE	
Delaware	HIGH	
District of Columbia	HIGH	
Florida	NONE	
Georgia	MEDIUM	
Guam		
Hawaii	NONE	
Idaho	NONE	
Illinois	NO RESPONSE	
Indiana	LOW	
Iowa	UNKNOWN	
Kansas	LOW	
Kentucky	HIGH	
Louisiana	NONE	
Maine	UNKNOWN	
Maryland	NONE	
Massachusetts	NONE	
Michigan	UNKNOWN	
Minnesota	NONE	
Mississippi	NONE	
Missouri	HIGH	
Montana	NONE	
Nebraska	UNKNOWN	
Nevada	NONE	
New Hampshire	NONE	
New Jersey	LOW	
New Mexico	HIGH	
New York	NONE	
North Carolina		
North Dakota	MEDIUM	
Ohio	NONE	
Oklahoma	HIGH	
Oregon	NO REPONSE	
Pennsylvania	NONE	
Puerto Rico	HIGH	

DRAFT Real ID Act Impact Analysis Results

Requirement M: Ensure physical security of locations where DL/ID cards are produced.		
Rhode Island	NONE	
South Carolina	UNKNOWN	
South Dakota	UNKNOWN	
Tennessee	NONE	
Texas	NONE	
Utah	UNKNOWN	
Vermont	UNKNOWN	
Virgin Islands		
Virginia	NONE	
Washington	NONE	
West Virginia	UNKNOWN	
Wisconsin	UNKNOWN	
Wyoming	LOW	



Summary: Low = 6, Medium = 3, High = 8, None = 23, Unknown = 10

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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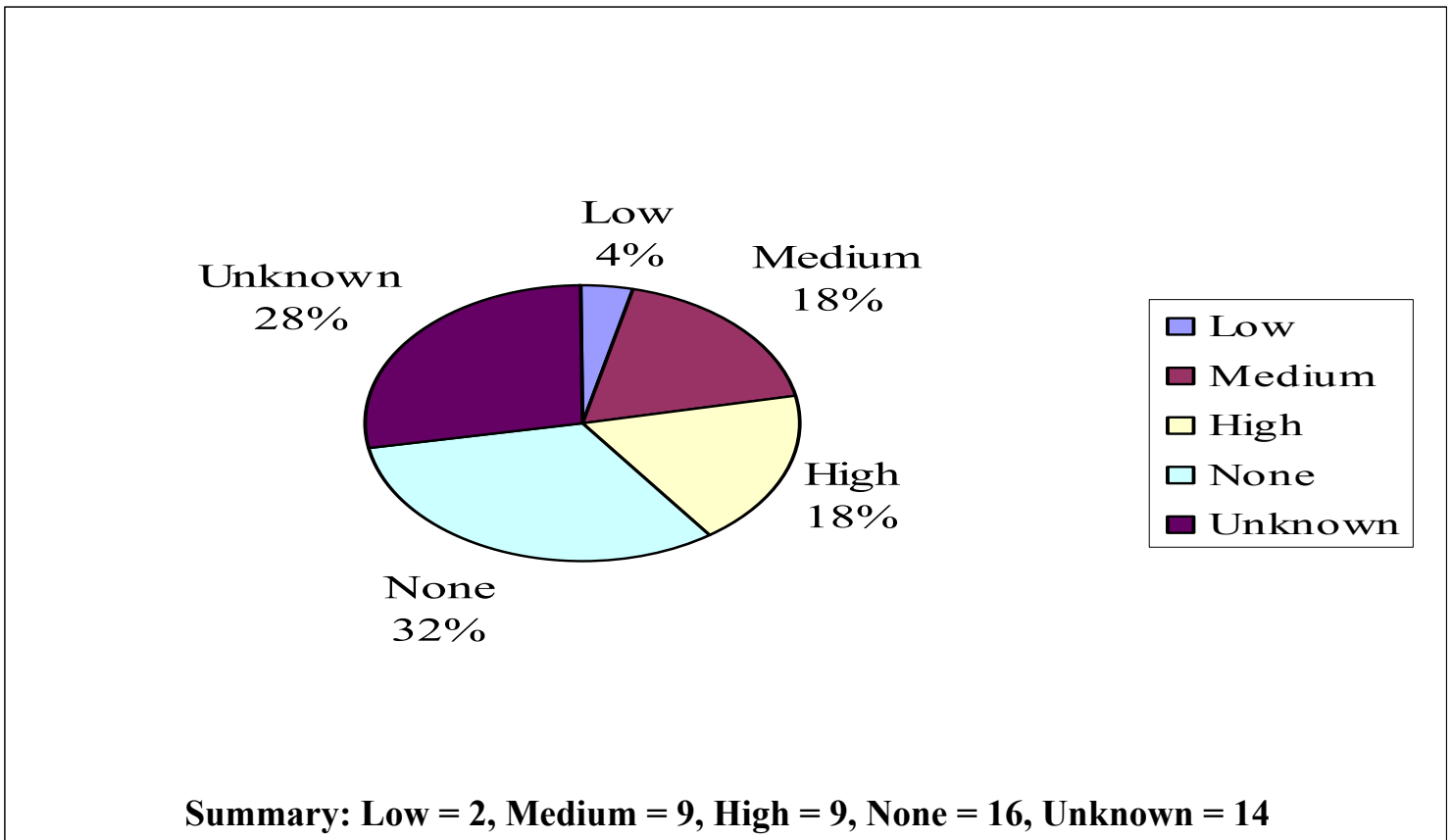
Real ID Act Impact Analysis Results

Requirement N: Subject all person's authorized to manufacture or produce DL/ID cards to appropriate security clearance requirements.		
Jurisdiction	Impact	Comments
Alabama	NONE	
Alaska	HIGH	
American Samoa	UNKNOWN	
Arizona	HIGH	
Arkansas	HIGH	
California	UNKNOWN	
Colorado	UNKNOWN	
Connecticut	UNKNOWN	
Delaware	HIGH	
District of Columbia	MEDIUM	
Florida	NONE	
Georgia	NONE	
Guam		
Hawaii	UNKNOWN	
Idaho	NONE	
Illinois	NO RESPONSE	
Indiana	NONE	
Iowa	UNKNOWN	
Kansas	MEDIUM	
Kentucky	HIGH	
Louisiana	NONE	
Maine	UNKNOWN	
Maryland	HIGH	
Massachusetts	NONE	
Michigan	UNKNOWN	
Minnesota	NONE	
Mississippi	NONE	
Missouri	MEDIUM	
Montana	NO RESPONSE	
Nebraska	UNKNOWN	
Nevada	LOW	
New Hampshire	MEDIUM	
New Jersey	NONE	
New Mexico	UNKNOWN	
New York	NONE	
North Carolina		
North Dakota	MEDIUM	
Ohio	NONE	
Oklahoma	HIGH	
Oregon	UNKNOWN	
Pennsylvania	NONE	

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Real ID Act Impact Analysis Results

Requirement N: Subject all person's authorized to manufacture or produce DI/ID cards to appropriate security clearance requirements.		
Puerto Rico	HIGH	
Rhode Island	NONE	
South Carolina	MEDIUM	
South Dakota	UNKNOWN	
Tennessee	UNKNOWN	
Texas	NONE	
Utah	MEDIUM	
Vermont	HIGH	
Virgin Islands		
Virginia	MEDIUM	
Washington	NONE	
West Virginia	LOW	
Wisconsin	MEDIUM	
Wyoming	UNKNOWN	



Low = Requires some policy changes **Medium** = Policy changes, computer programming **None** = Already in place
High = Major reprogramming, training, legislation/major costs **Unknown** = Need more information to determine impact
N/A = Not applicable **No Response** = No comments provided on this requirement

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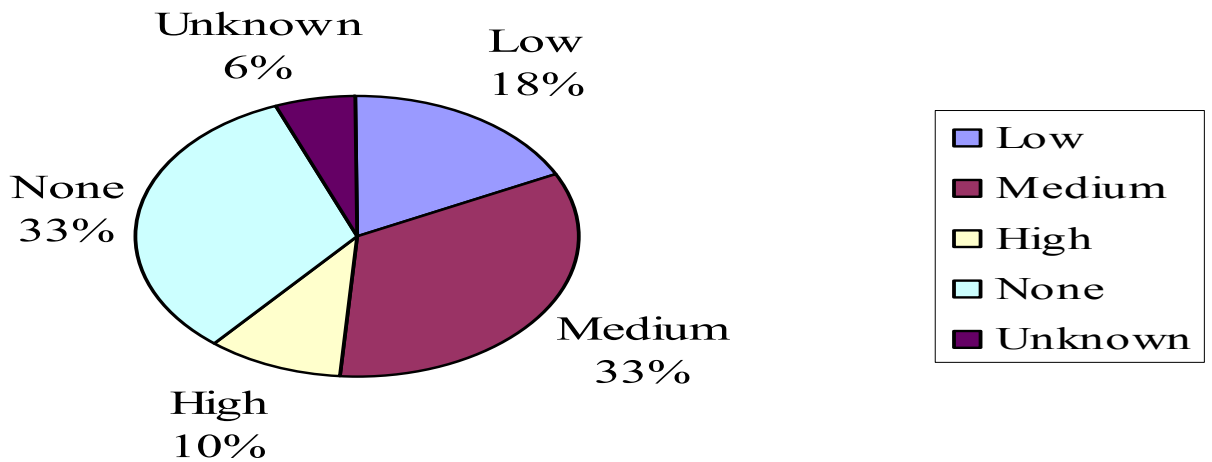
Real ID Act Impact Analysis Results

Requirement O: Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards.		
Jurisdiction	Impact	Comments
Alabama	UNKNOWN	
Alaska	HIGH	
American Samoa	HIGH	
Arizona	NONE	
Arkansas	MEDIUM	
California	LOW	
Colorado	NONE	
Connecticut	LOW	
Delaware	MEDIUM	
District of Columbia	LOW	
Florida	NONE	
Georgia	NONE	
Guam		
Hawaii	MEDIUM	
Idaho	NONE	
Illinois	NO RESPONSE	
Indiana	NONE	
Iowa	NONE	
Kansas	MEDIUM	
Kentucky	HIGH	
Louisiana	NONE	
Maine	NONE	
Maryland	NONE	
Massachusetts	MEDIUM	
Michigan	NONE	
Minnesota	LOW	
Mississippi	MEDIUM	
Missouri	MEDIUM	
Montana	LOW	
Nebraska	UNKNOWN	
Nevada	NONE	
New Hampshire	NONE	
New Jersey	LOW	
New Mexico	HIGH	
New York	LOW	
North Carolina		
North Dakota	MEDIUM	
Ohio	MEDIUM	
Oklahoma	HIGH	
Oregon	UNKNOWN	
Pennsylvania	NONE	

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Real ID Act Impact Analysis Results

Requirement O: Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards.		
Puerto Rico	MEDIUM	
Rhode Island	MEDIUM	
South Carolina	MEDIUM	
South Dakota	MEDIUM	
Tennessee	LOW	
Texas	MEDIUM	
Utah	MEDIUM	
Vermont	NONE	
Virgin Islands		
Virginia	MEDIUM	
Washington	NONE	
West Virginia	NONE	
Wisconsin	MEDIUM	
Wyoming	LOW	



Summary: Low = 9, Medium = 17, High = 5, None = 17, Unknown = 3

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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Real ID Act Impact Analysis Results

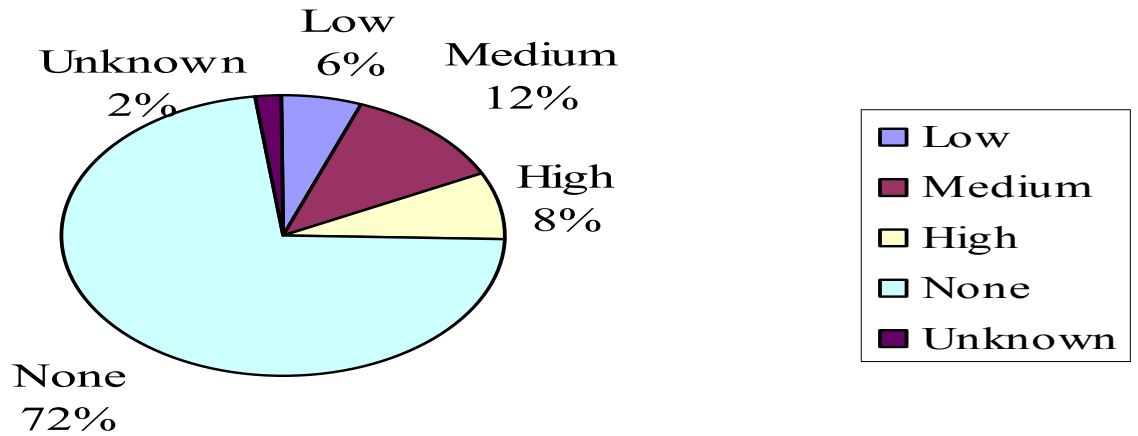
Requirement P: Limit period of validity of DL/ID cards that are not temporary to a period not exceeding 8 years.		
Jurisdiction	Impact	Comments
Alabama	NONE	
Alaska	NONE	
American Samoa	HIGH	
Arizona	HIGH	
Arkansas	NONE	
California	HIGH	
Colorado	NONE	
Connecticut	NONE	
Delaware	NONE	
District of Columbia	NONE	
Florida	NONE	
Georgia	HIGH	
Guam		
Hawaii	NONE	
Idaho	NONE	
Illinois	NO RESPONSE	
Indiana	NONE	
Iowa	NONE	
Kansas	NONE	
Kentucky	NONE	
Louisiana	NONE	
Maine	NONE	
Maryland	NONE	
Massachusetts	NONE	
Michigan	NONE	
Minnesota	NONE	
Mississippi	NONE	
Missouri	LOW	
Montana	UNKNOWN	
Nebraska	NONE	
Nevada	NONE	
New Hampshire	NONE	
New Jersey	LOW	
New Mexico	NONE	
New York	LOW	
North Carolina		
North Dakota	MEDIUM	
Ohio	NONE	
Oklahoma	NONE	
Oregon	NONE	
Pennsylvania	NONE	

Real ID Act Impact Analysis Results

Requirement P: Limit period of validity of DL/ID cards that are not temporary to a period not

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exceeding 8 years.	
Puerto Rico	NONE
Rhode Island	NONE
South Carolina	MEDIUM
South Dakota	NONE
Tennessee	NONE
Texas	MEDIUM
Utah	MEDIUM
Vermont	NONE
Virgin Islands	
Virginia	NONE
Washington	MEDIUM
West Virginia	NONE
Wisconsin	NONE
Wyoming	MEDIUM



Summary: Low = 3, Medium = 6, High = 4, None = 37, Unknown = 1

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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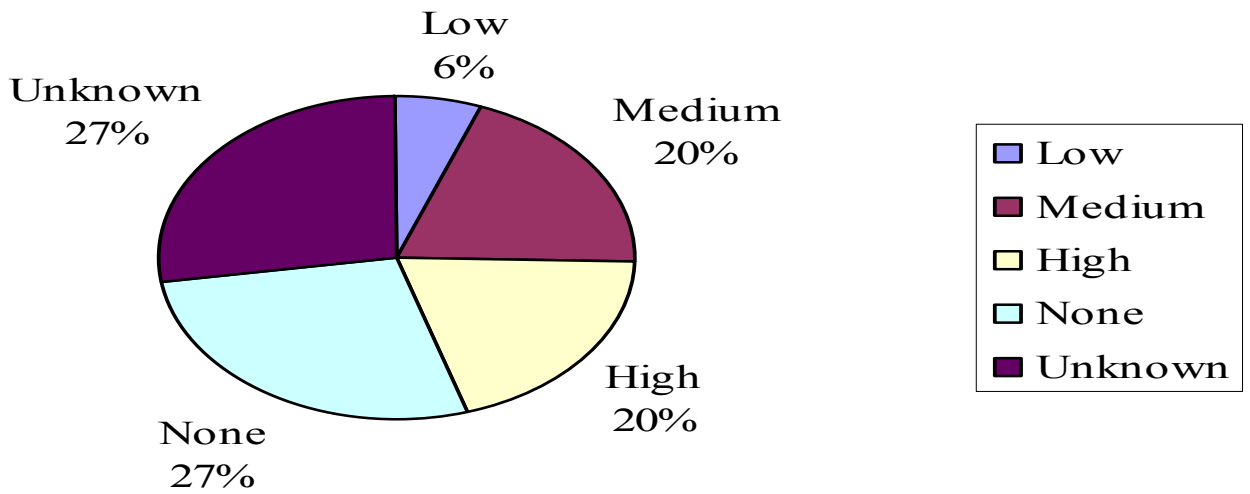
Real ID Act Impact Analysis Results

Requirement Q: Alternative document design if it does not meet federal standard.		
Jurisdiction	Impact	Comments
Alabama	UNKNOWN	
Alaska	HIGH	
American Samoa	HIGH	
Arizona	HIGH	
Arkansas	UNKNOWN	
California	LOW	
Colorado	UNKNOWN	
Connecticut	NONE	
Delaware	MEDIUM	
District of Columbia	UNKNOWN	
Florida	NONE	
Georgia	UNKNOWN	
Guam		
Hawaii	UNKNOWN	
Idaho	MEDIUM	
Illinois	NO RESPONSE	
Indiana	UNKNOWN	
Iowa	LOW	
Kansas	NONE	
Kentucky	MEDIUM	
Louisiana	NONE	
Maine	MEDIUM	
Maryland	NONE	
Massachusetts	NONE	
Michigan	UNKNOWN	
Minnesota	NONE	
Mississippi	NONE	
Missouri	HIGH	
Montana	LOW	
Nebraska	UNKNOWN	
Nevada	HIGH	
New Hampshire	UNKNOWN	
New Jersey	HIGH	
New Mexico	UNKNOWN	
New York	NONE	
North Carolina		
North Dakota	MEDIUM	
Ohio	NONE	
Oklahoma	UNKNOWN	
Oregon	MEDIUM	
Pennsylvania	NONE	
Puerto Rico	MEDIUM	

Requirement Q: Alternative document design if it does not meet federal standard.

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Rhode Island	HIGH
South Carolina	HIGH
South Dakota	NONE
Tennessee	NONE
Texas	MEDIUM
Utah	MEDIUM
Vermont	HIGH
Virgin Islands	
Virginia	MEDIUM
Washington	HIGH
West Virginia	NONE
Wisconsin	UNKNOWN
Wyoming	UNKNOWN



Summary: Low = 3, Medium = 10, High = 10, None = 14, Unknown = 14

Low = Requires some policy changes **Medium** = Policy changes, computer programming **None** = Already in place
High = Major reprogramming, training, legislation/major costs **Unknown** = Need more information to determine impact
N/A = Not applicable **No Response** = No comments provided on this requirement

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Real ID Act Impact Analysis Results

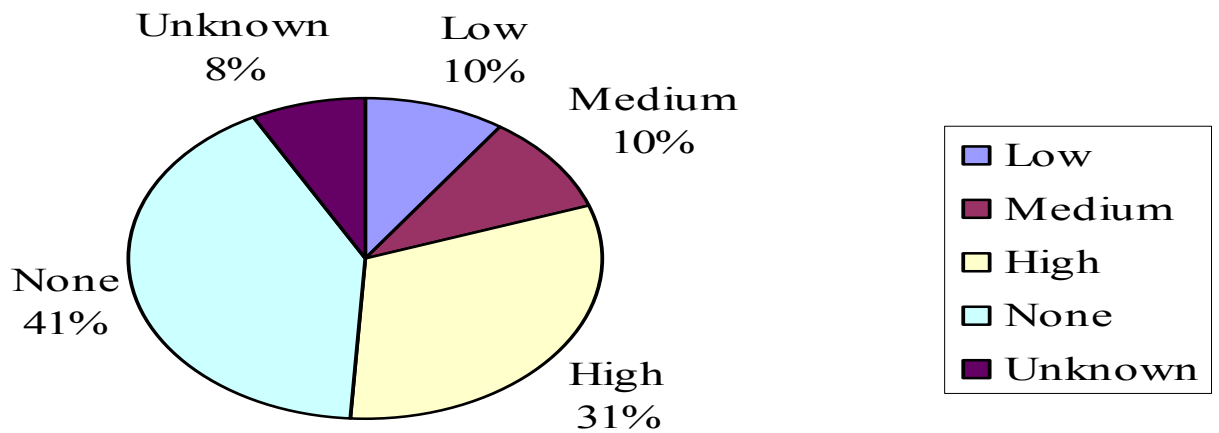
Requirement R: Legal Presence Requirement.		
Jurisdiction	Impact	Comments
Alabama	NONE	
Alaska	NONE	
American Samoa	HIGH	
Arizona	NONE	
Arkansas	NONE	
California	LOW	
Colorado	NONE	
Connecticut	NONE	
Delaware	HIGH	
District of Columbia	UNKNOWN	
Florida	NONE	
Georgia	NONE	
Guam		
Hawaii	HIGH	
Idaho	HIGH	
Illinois	NO RESPONSE	
Indiana	NONE	
Iowa	LOW	
Kansas	NONE	
Kentucky	LOW	
Louisiana	NONE	
Maine	HIGH	
Maryland	LOW	
Massachusetts	MEDIUM	
Michigan	MEDIUM	
Minnesota	NONE	
Mississippi	NONE	
Missouri	UNKNOWN	
Montana	UNKNOWN	
Nebraska	MEDIUM	
Nevada	MEDIUM	
New Hampshire	NONE	
New Jersey	LOW	
New Mexico	HIGH	
New York	MEDIUM	
North Carolina		
North Dakota	HIGH	
Ohio	NONE	
Oklahoma	NONE	
Oregon	UNKNOWN	
Pennsylvania	NONE	
Puerto Rico	HIGH	

Real ID Act Impact Analysis Results

Requirement R: Legal Presence Requirement.

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Rhode Island	HIGH
South Carolina	HIGH
South Dakota	NONE
Tennessee	NONE
Texas	HIGH
Utah	HIGH
Vermont	HIGH
Virgin Islands	
Virginia	HIGH
Washington	HIGH
West Virginia	NONE
Wisconsin	HIGH
Wyoming	NONE



Summary: Low = 5, Medium = 5, High = 16, None = 21, Unknown = 4

Low = Requires some policy changes **Medium** = Policy changes, computer programming **None** = Already in place
High = Major reprogramming, training, legislation/major costs **Unknown** = Need more information to determine impact
N/A = Not applicable **No Response** = No comments provided on this requirement

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Real ID Act Impact Analysis Results

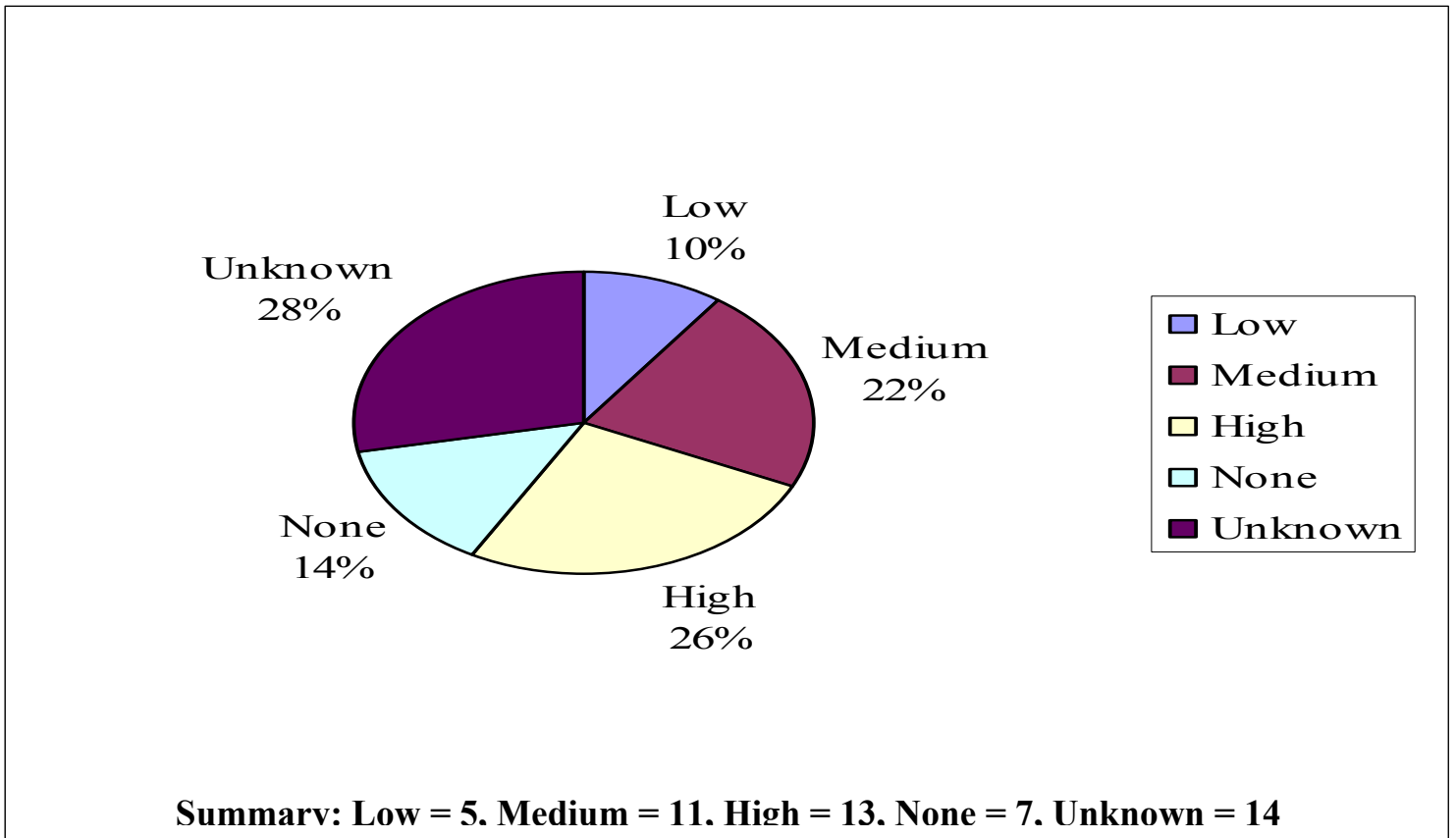
Requirement S: Provide electronic access to all other states to information contained in the motor vehicle database of the state.		
Jurisdiction	Impact	Comments
Alabama	NONE	
Alaska	HIGH	
American Samoa	LOW	
Arizona	MEDIUM	
Arkansas	HIGH	
California	UNKNOWN	
Colorado	HIGH	
Connecticut	HIGH	
Delaware	NONE	
District of Columbia	NONE	
Florida	NONE	
Georgia	HIGH	
Guam		
Hawaii	HIGH	
Idaho	NONE	
Illinois	NO RESPONSE	
Indiana	LOW	
Iowa	LOW	
Kansas	LOW	
Kentucky	UNKNOWN	
Louisiana	LOW	
Maine	HIGH	
Maryland	MEDIUM	
Massachusetts	NONE	
Michigan	MEDIUM	
Minnesota	UNKNOWN	
Mississippi	UNKNOWN	
Missouri	UNKNOWN	
Montana	MEDIUM	
Nebraska	UNKNOWN	
Nevada	NONE	
New Hampshire	UNKNOWN	
New Jersey	MEDIUM	
New Mexico	UNKNOWN	
New York	MEDIUM	
North Carolina		
North Dakota	UNKNOWN	
Ohio	MEDIUM	
Oklahoma	UNKNOWN	
Oregon	UNKNOWN	
Pennsylvania	HIGH	

Real ID Act Impact Analysis Results

Requirement S: Provide electronic access to all other states to information contained in the motor

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vehicle database of the state.	
Puerto Rico	MEDIUM
Rhode Island	HIGH
South Carolina	MEDIUM
South Dakota	UNKNOWN
Tennessee	HIGH
Texas	MEDIUM
Utah	MEDIUM
Vermont	UNKNOWN
Virgin Islands	
Virginia	MEDIUM
Washington	HIGH
West Virginia	UNKNOWN
Wisconsin	HIGH
Wyoming	HIGH



Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

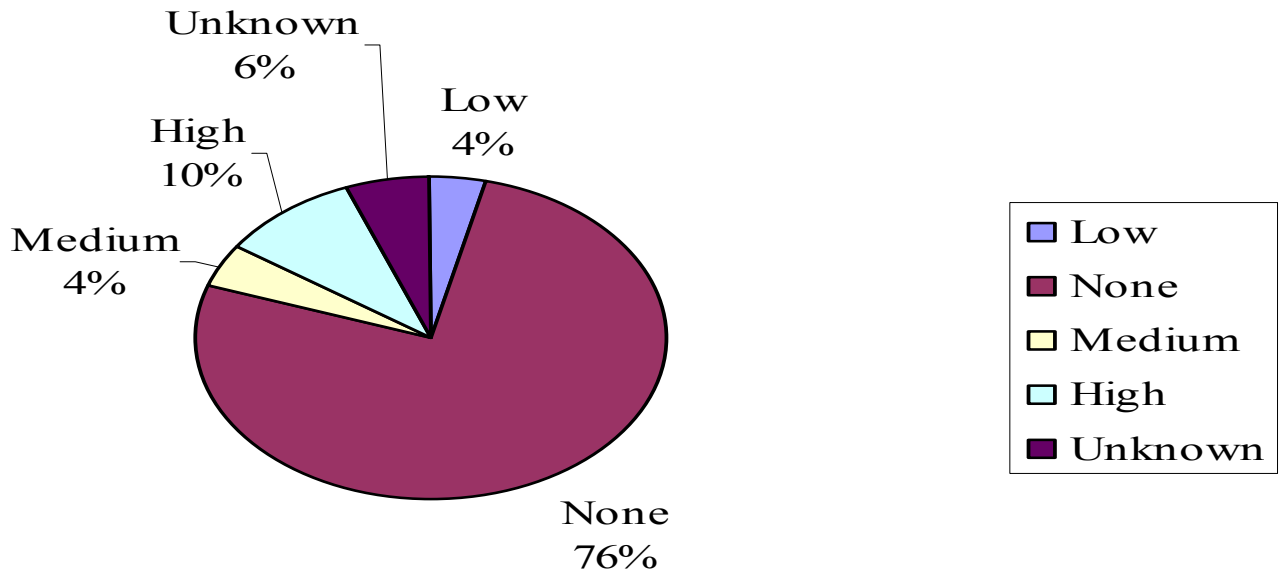
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Real ID Act Impact Analysis Results

Requirement T: Maintain a state motor vehicle database that contains at a minimum.*		
Jurisdiction	Impact	Comments
Alabama	NONE	
Alaska	NONE	
American Samoa	UNKNOWN	
Arizona	NONE	
Arkansas	HIGH	
California	NONE	
Colorado	NONE	
Connecticut	NONE	
Delaware	NONE	
District of Columbia	HIGH	
Florida	NONE	
Georgia	NONE	
Guam		
Hawaii	HIGH	
Idaho	NONE	
Illinois	NO RESPONSE	
Indiana	NONE	
Iowa	NONE	
Kansas	NONE	
Kentucky	UNKNOWN	
Louisiana	NONE	
Maine	NONE	
Maryland	MEDIUM	
Massachusetts	NONE	
Michigan	NONE	
Minnesota	NONE	
Mississippi	NONE	
Missouri	NONE	
Montana	NONE	
Nebraska	NONE	
Nevada	NONE	
New Hampshire	NONE	
New Jersey	NONE	
New Mexico	NONE	
New York	NONE	
North Carolina		
North Dakota	HIGH	
Ohio	NONE	
Oklahoma	NONE	
Oregon	LOW	
Pennsylvania	HIGH	
Puerto Rico	NONE	
Real ID Act Impact Analysis Results		
Requirement T: Maintain a state motor vehicle database that contains at a minimum.		

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(See detailed appendix)	
Rhode Island	NONE
South Carolina	UNKNOWN
South Dakota	NONE
Tennessee	NONE
Texas	NONE
Utah	MEDIUM
Vermont	NONE
Virgin Islands	
Virginia	NONE
Washington	LOW
West Virginia	NONE
Wisconsin	NONE
Wyoming	NONE



Summary: Low = 2, Medium = 2, High = 5, None = 39, Unknown = 3

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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Real ID Act Impact Analysis Results

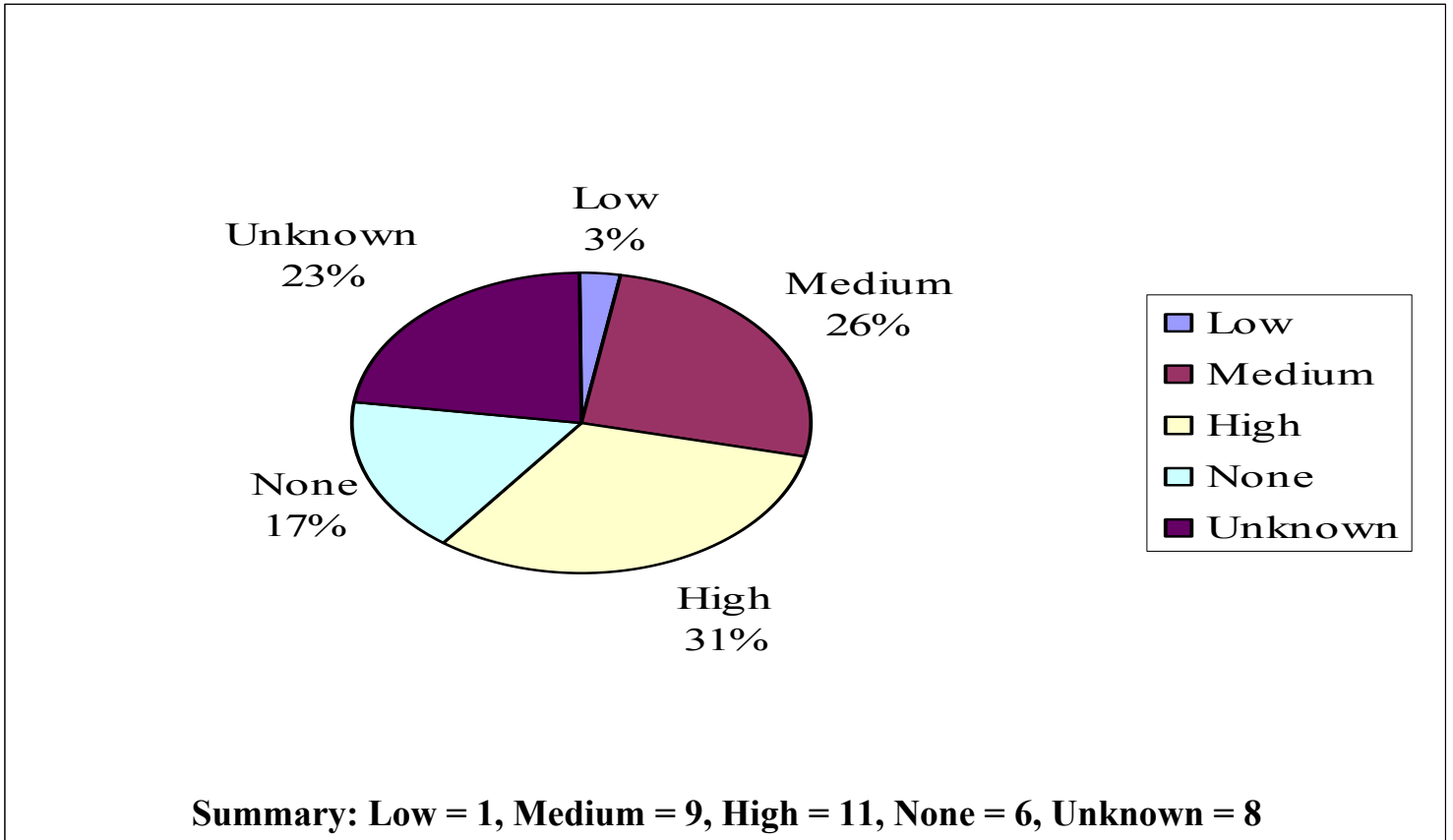
Requirement U: Optional – Development and issuance of a certificate of driving – not for federal identification purposes – for those who cannot prove lawful presence.		
Jurisdiction	Impact	Comments
Alabama	NO RESPONSE	
Alaska	UNKNOWN	
Arizona	NO RESPONSE	
Arkansas	NO RESPONSE	
California	HIGH	
Colorado	NONE	
Connecticut	NO RESPONSE	
Delaware	NO RESPONSE	
District of Columbia	HIGH	
Florida	NO RESPONSE	
Georgia	NO RESPONSE	
Guam		
Hawaii	NO RESPONSE	
Idaho	HIGH	
Illinois	NO RESPONSE	
Indiana	UNKNOWN	
Iowa	LOW	
Kansas	NO RESPONSE	
Kentucky	UNKNOWN	
Louisiana	NO RESPONSE	
Maine	MEDIUM	
Maryland	MEDIUM	
Massachusetts	MEDIUM	
Michigan	NO RESPONSE	
Minnesota	NO RESPONSE	
Mississippi	NONE	
Missouri	HIGH	
Montana	UNKNOWN	
Nebraska	NO RESPONSE	
Nevada	NO RESPONSE	
New Hampshire	NO RESPONSE	
New Jersey	HIGH	
New Mexico	HIGH	
New York	HIGH	
North Carolina		
North Dakota	MEDIUM	
Ohio	MEDIUM	
Oklahoma	NONE	
Oregon	UNKNOWN	
Pennsylvania	NONE	

Real ID Act Impact Analysis Results

Requirement U: Optional – Development and issuance of a certificate of driving – not for federal

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identification purposes – for those who cannot prove lawful presence.	
Puerto Rico	UNKNOWN
Rhode Island	HIGH
South Carolina	HIGH
South Dakota	HIGH
Tennessee	NONE
Texas	MEDIUM
Utah	MEDIUM
Vermont	UNKNOWN
Virgin Islands	
Virginia	MEDIUM
Washington	HIGH
West Virginia	NONE
Wisconsin	UNKNOWN
Wyoming	MEDIUM

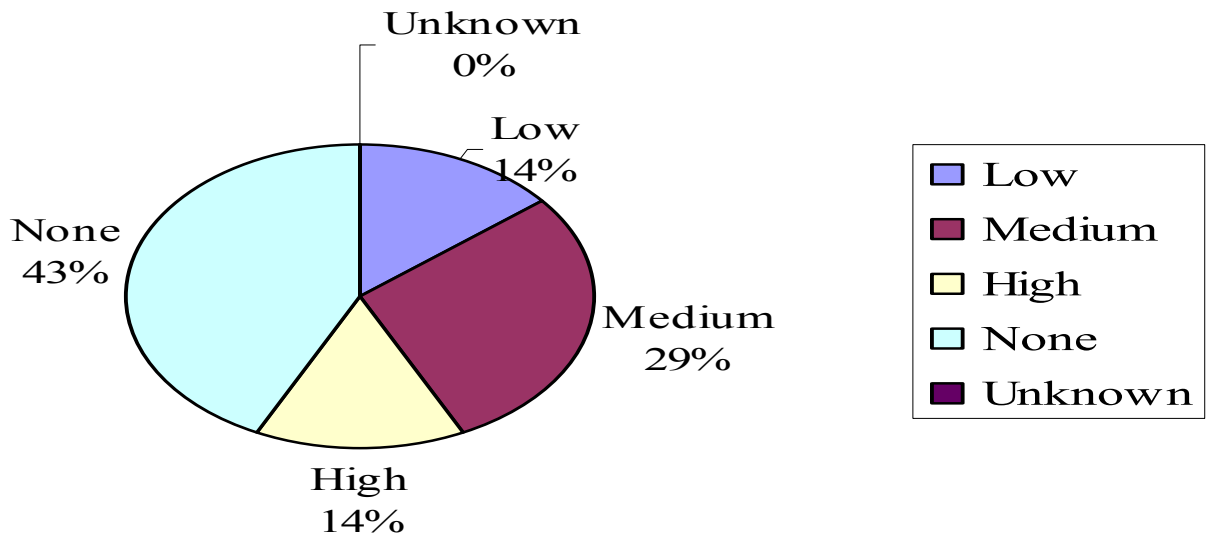


Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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Real ID Act Impact Analysis Results

Requirement A: Introduce full legal name into driver licensing system (in record, on document).		
Jurisdiction	Impact	Comments
Alberta	LOW	
British Columbia	NONE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	NONE	
Nunavut	NO RESPONSE	
Ontario	HIGH	
Prince Edward Island	MEDIUM	
Quebec	NONE	
Saskatchewan	MEDIUM	
Yukon	NO RESPONSE	



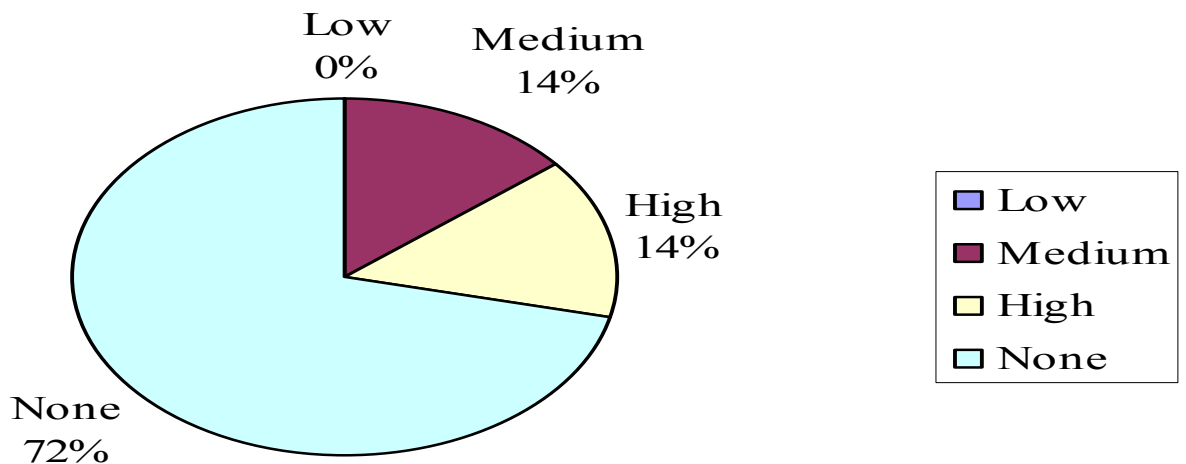
Summary: Low = 1, Medium = 2, High = 1, None = 3, Unknown = 0, N/A =

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	No Response = No comments provided on this requirement
N/A = Not applicable		

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Real ID Act Impact Analysis Results

Requirement B: Have following data elements/features on the document. (See detailed appendix)		
Jurisdiction	Impact	Comments
Alberta	MEDIUM	
British Columbia	NONE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	NONE	
Nunavut	NO RESPONSE	
Ontario	HIGH	
Prince Edward Island	NONE	
Quebec	NONE	
Saskatchewan	NONE	
Yukon	HIGH	



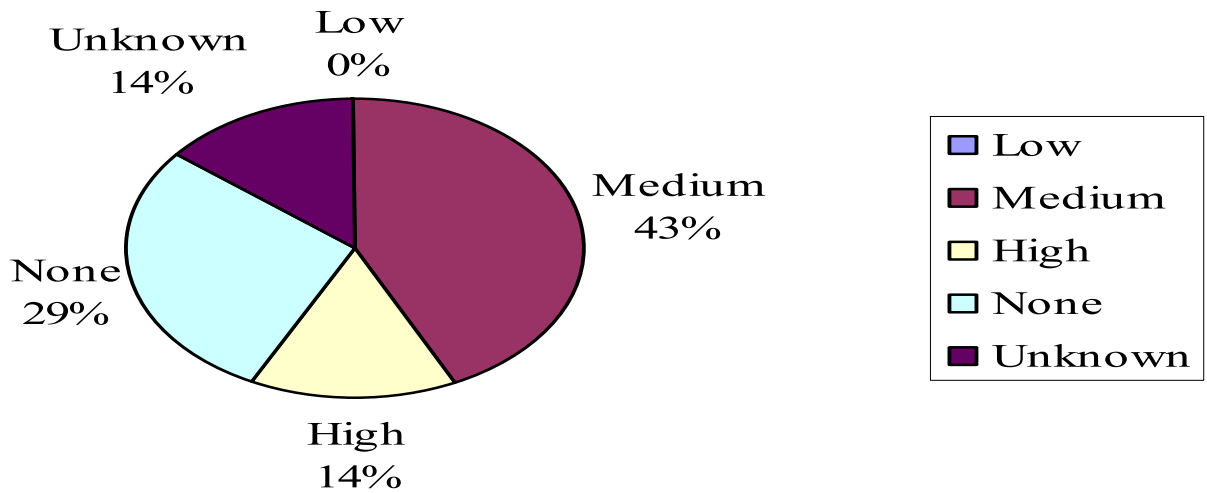
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Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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Real ID Act Impact Analysis Results

Requirement C: Introduce temporary DL/ID cards and tying end of stay to expiration of DL/ID card (or issuance for no more than 1 year).		
Jurisdiction	Impact	Comments
Alberta	MEDIUM	
British Columbia	NO RESPONSE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	MEDIUM	
Nunavut	NO RESPONSE	
Ontario	HIGH	
Prince Edward Island	NONE	
Quebec	UNKNOWN	
Saskatchewan	MEDIUM	
Yukon	NONE	



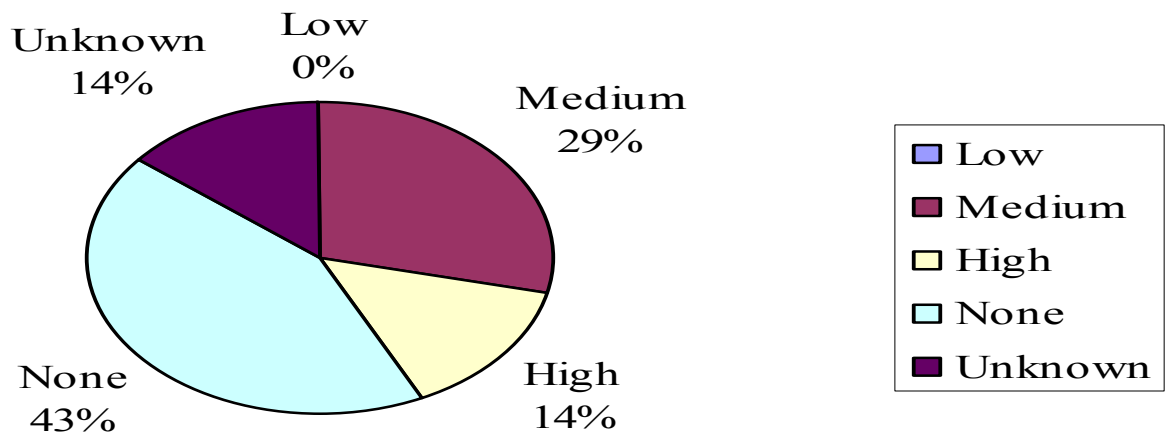
Summary: Low = 0, Medium = 3, High = 1, None = 2, Unknown = 1, N/A = 0

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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Real ID Act Impact Analysis Results

Requirement D: Amending card design to show/indicate that it is a temporary document with a “different than usual” expiration date.		
Jurisdiction	Impact	Comments
Alberta	NONE	
British Columbia	NO RESPONSE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	NONE	
Nunavut	NO RESPONSE	
Ontario	MEDIUM	
Prince Edward Island	HIGH	
Quebec	NONE	
Saskatchewan	MEDIUM	
Yukon	UNKNOWN	



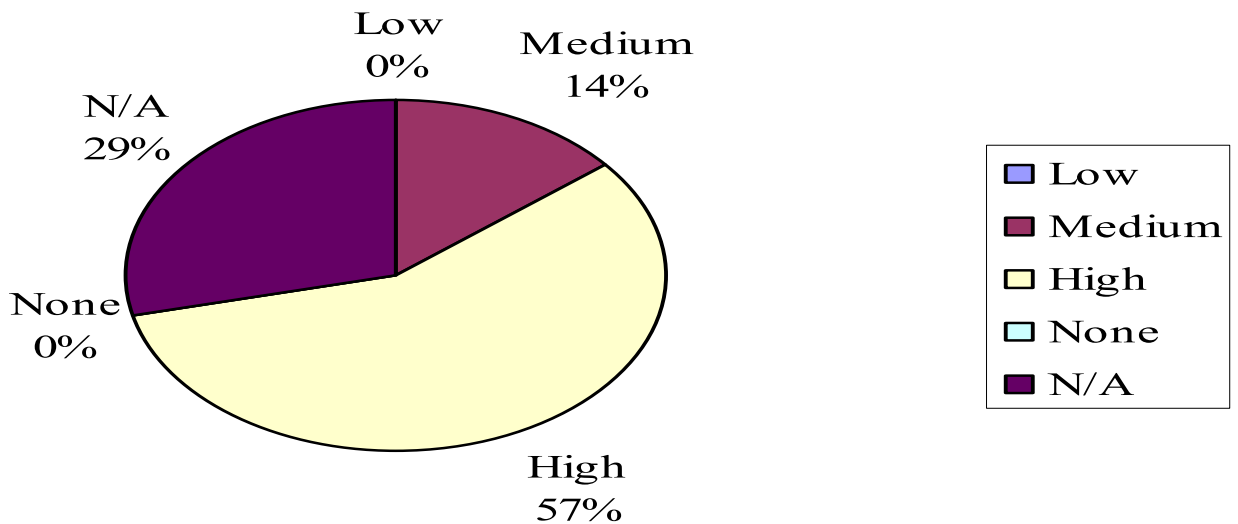
Summary: Low = 0, Medium = 2, High = 1, None = 3, Unknown = 1, N/A = 0

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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Real ID Act Impact Analysis Results

Requirement E: Verification at Source: Enabling your system to electronically verify documentation (See detailed appendix).		
Jurisdiction	Impact	Comments
Alberta	N/A	
British Columbia	NO RESPONSE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	N/A	
Nunavut	NO RESPONSE	
Ontario	HIGH	
Prince Edward Island	HIGH	
Quebec	HIGH	
Saskatchewan	MEDIUM	
Yukon	HIGH	



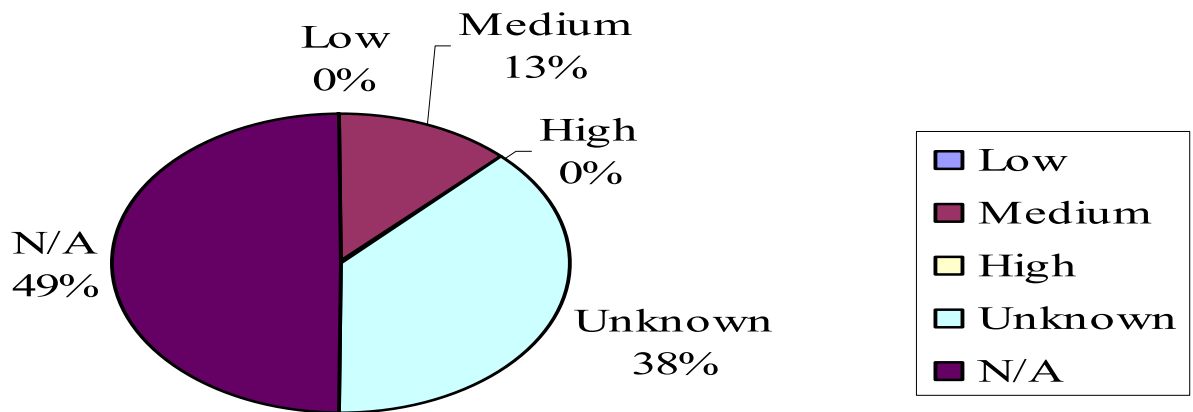
Summary: Low = 0, Medium = 1, High = 4, None = 0, Unknown = 0, N/A = 2

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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Real ID Act Impact Analysis Results

Requirement F: Developing access capability to SAVE system.		
Jurisdiction	Impact	Comments
Alberta	N/A	
British Columbia	NO RESPONSE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	N/A	
Nunavut	MEDIUM	
Ontario	UNKNOWN	
Prince Edward Island	UNKNOWN	
Quebec	UNKNOWN	
Saskatchewan	N/A	
Yukon	N/A	



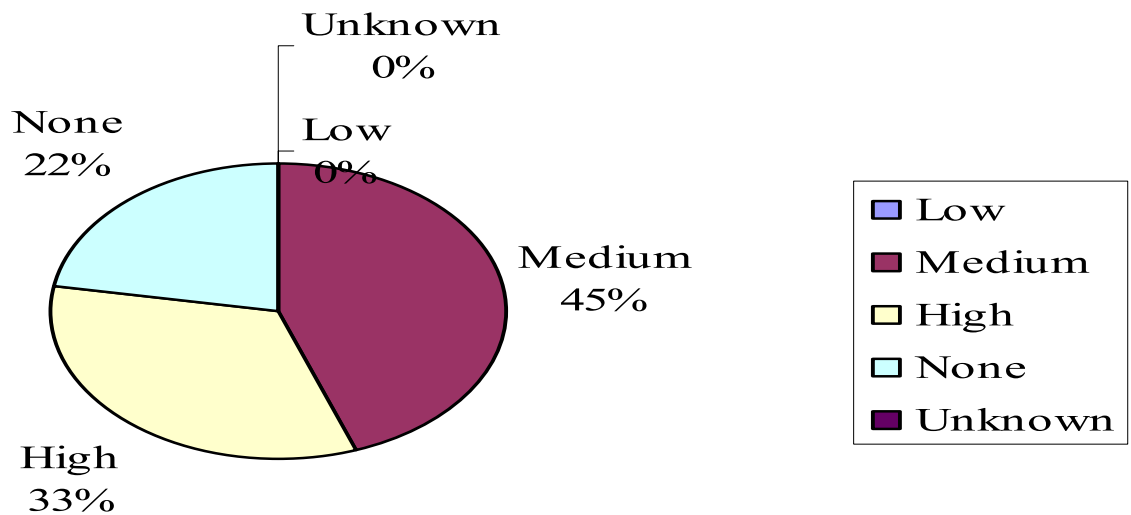
Summary: Low = 0, Medium = 1, High = 0, None = 0, Unknown = 3, N/A = 4

Low = Requires some policy changes
Medium = Policy changes, computer programming
None = Already in place
High = Major reprogramming, training, legislation/major costs
Unknown = Need more information to determine impact
N/A = Not applicable
No Response = No comments provided on this requirement

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Real ID Act Impact Analysis Results

Requirement G: Introduce equipment into system to capture digital images of identity source Documents so that images can be retained in electronic storage in a transferable format.		
Jurisdiction	Impact	Comments
Alberta	HIGH	
British Columbia	NONE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	NONE	
Nunavut	MEDIUM	
Ontario	MEDIUM	
Prince Edward Island	MEDIUM	
Quebec	HIGH	
Saskatchewan	MEDIUM	
Yukon	HIGH	



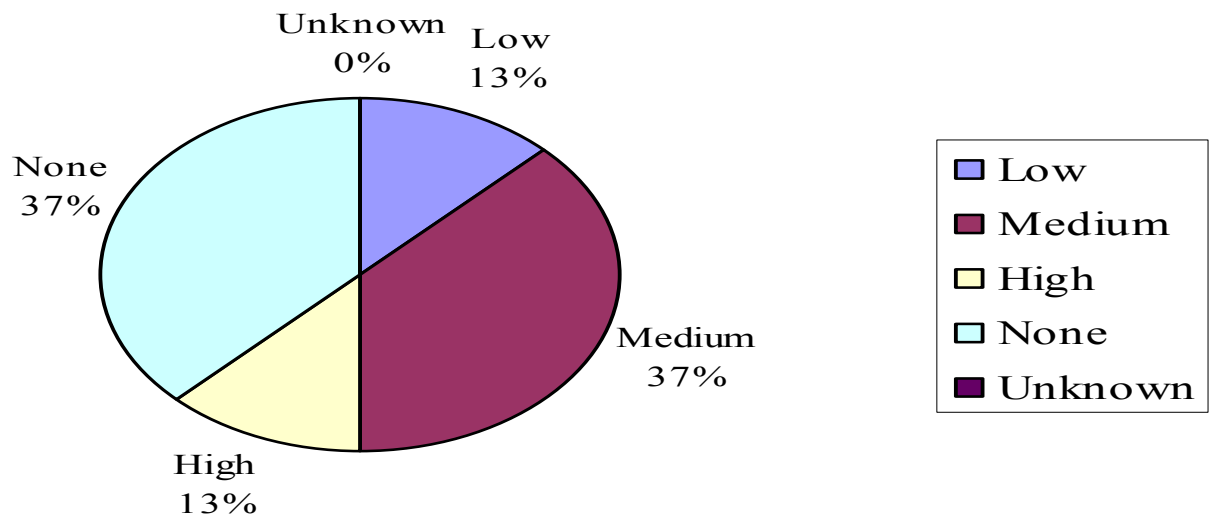
Summary: Low = 0, Medium = 4, High = 3, None = 2, Unknown = 0, N/A = 0

Low = Requires some policy changes **Medium** = Policy changes, computer programming **None** = Already in place
High = Major reprogramming, training, legislation/major costs **Unknown** = Need more information to determine impact
N/A = Not applicable **No Response** = No comments provided on this requirement

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Real ID Act Impact Analysis Results

Requirement H: Retain paper copies of source documents for a minimum of 7 years or images of source documents presented for a minimum of 10 years.		
Jurisdiction	Impact	Comments
Alberta	MEDIUM	
British Columbia	NO RESPONSE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	NONE	
Nunavut	LOW	
Ontario	NONE	
Prince Edward Island	MEDIUM	
Quebec	HIGH	
Saskatchewan	MEDIUM	
Yukon	NONE	



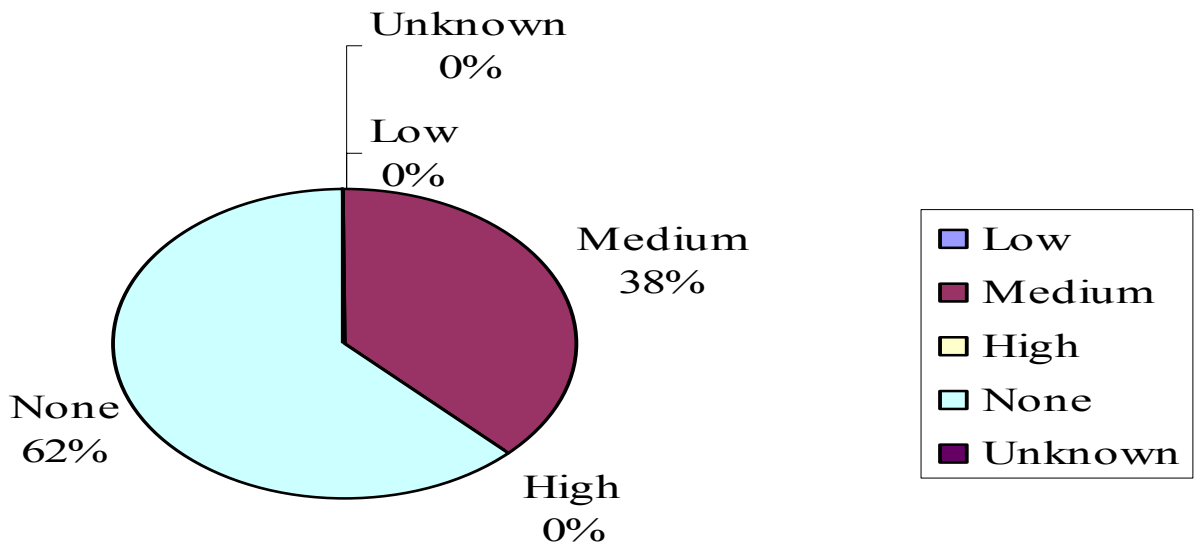
Summary: Low = 1, Medium = 3, High = 1, None = 3, Unknown = 0, N/A = 0

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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Real ID Act Impact Analysis Results

Requirement I: Subject each person applying for a driver's license of identification card to mandatory facial image capture.		
Jurisdiction	Impact	Comments
Alberta	NO REPOSE	
British Columbia	NONE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	NONE	
Nunavut	MEDIUM	
Ontario	NONE	
Prince Edward Island	NONE	
Quebec	NONE	
Saskatchewan	MEDIUM	
Yukon	MEDIUM	



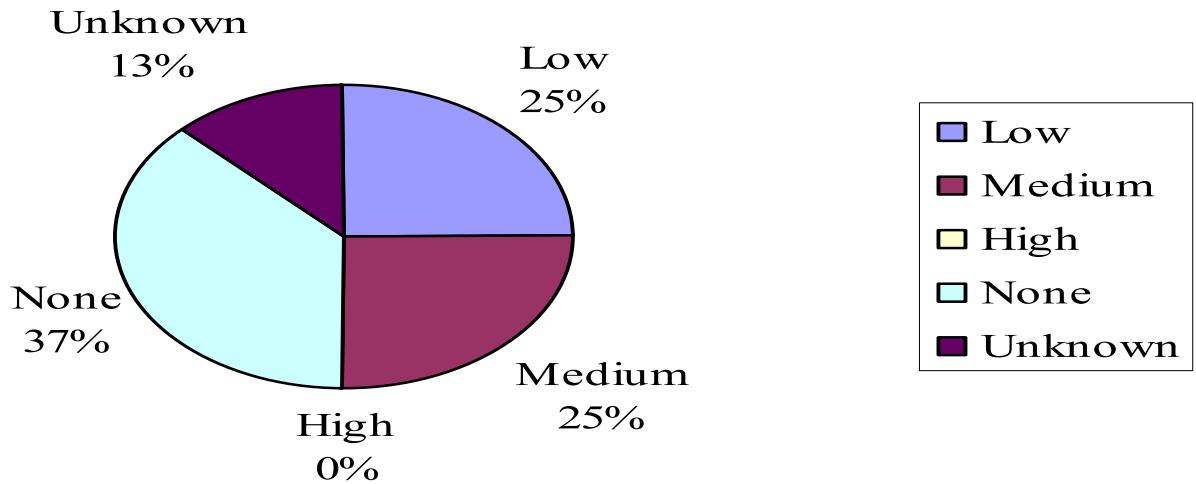
Summary: Low = 0, Medium = 3, High = 0, None = 5, Unknown = 0, N/A = 0

Low = Requires some policy changes
 Medium = Policy changes, computer programming
 None = Already in place
High = Major reprogramming, training, legislation/major costs
Unknown = Need more information to determine impact
N/A = Not applicable
No Response = No comments provided on this requirement

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Real ID Act Impact Analysis Results

Requirement J: Establish an effective procedure to confirm or verify a renewing applicant's information.		
Jurisdiction	Impact	Comments
Alberta	NO RESPONSE	
British Columbia	NONE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	LOW	
Nunavut	MEDIUM	
Ontario	MEDIUM	
Prince Edward Island	LOW	
Quebec	UNKNOWN	
Saskatchewan	NONE	
Yukon	NONE	



Summary: Low = 2, Medium = 2, High = 0, None = 3, Unknown = 1, N/A = 0

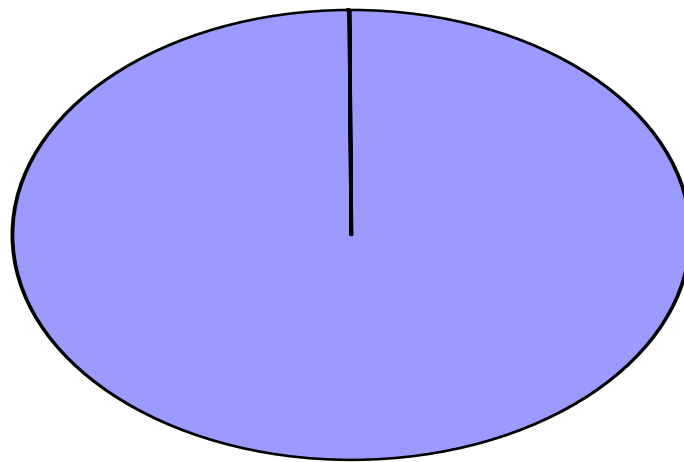
Low = Requires some policy changes
Medium = Policy changes, computer programming
None = Already in place
High = Major reprogramming, training, legislation/major costs
Unknown = Need more information to determine impact
N/A = Not applicable
No Response = No comments provided on this requirement

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Real ID Act Impact Analysis Results

Requirement K: In the event that a social security account number is already registered to or associated with another person to which any state has issued a DI/ID card, the state shall resolve the discrepancy and take appropriate action.

Jurisdiction	Impact	Comments
Alberta	N/A	
British Columbia	N/A	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	N/A	
Nunavut	N/A	
Ontario	N/A	
Prince Edward Island	N/A	
Quebec	N/A	
Saskatchewan	N/A	
Yukon	N/A	



N/A
100%

Summary: Low = 0, Medium = 0, High = 0, None = 0, Unknown = 0, N/A = 9

Low = Requires some policy changes

Medium = Policy changes, computer programming

None = Already in place

High = Major reprogramming, training, legislation/major costs

Unknown = Need more information to determine impact

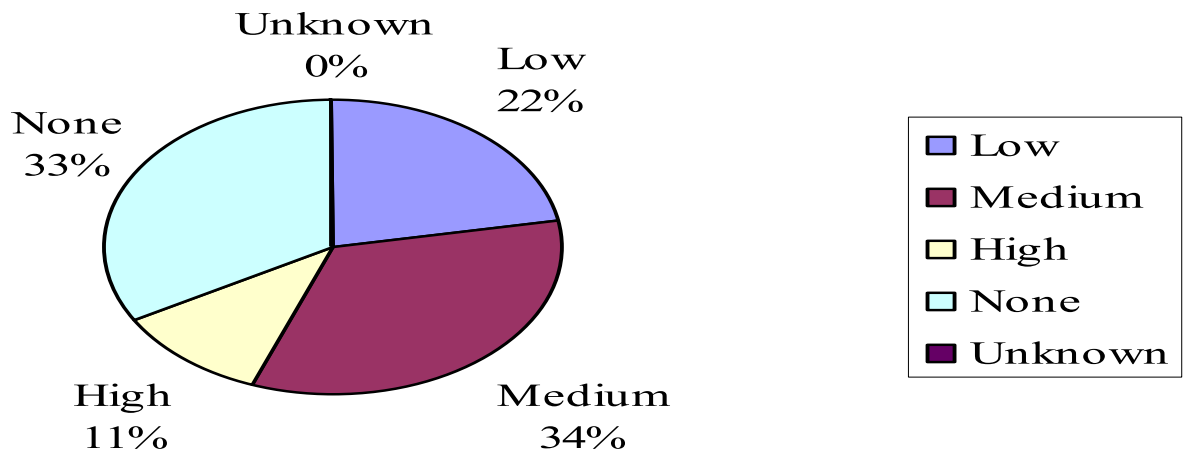
N/A = Not applicable

No Response = No comments provided on this requirement

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Real ID Act Impact Analysis Results

Requirement L: Check other states if a person already was issued a DL in another state..		
Jurisdiction	Impact	Comments
Alberta	MEDIUM	
British Columbia	NONE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	NONE	
Nunavut	LOW	
Ontario	HIGH	
Prince Edward Island	LOW	
Quebec	MEDIUM	
Saskatchewan	MEDIUM	
Yukon	NONE	



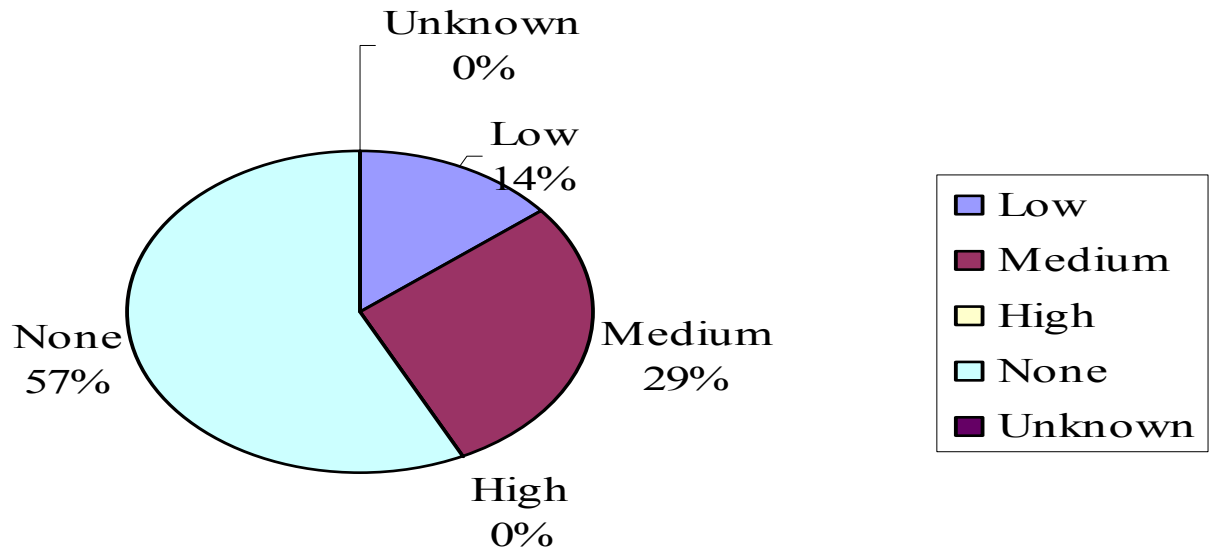
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Low = Requires some policy changes
Medium = Policy changes, computer programming
None = Already in place
High = Major reprogramming, training, legislation/major costs
Unknown = Need more information to determine impact
N/A = Not applicable
No Response = No comments provided on this requirement

DRAFT

Real ID Act Impact Analysis Results

Requirement M: Ensure physical security of locations where DI/ID cards are produced.		
Jurisdiction	Impact	Comments
Alberta	NO RESPONSE	
British Columbia	NO RESPONSE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	LOW	
Nunavut	MEDIUM	
Ontario	MEDIUM	
Prince Edward Island	NONE	
Quebec	NONE	
Saskatchewan	NONE	
Yukon	NONE	



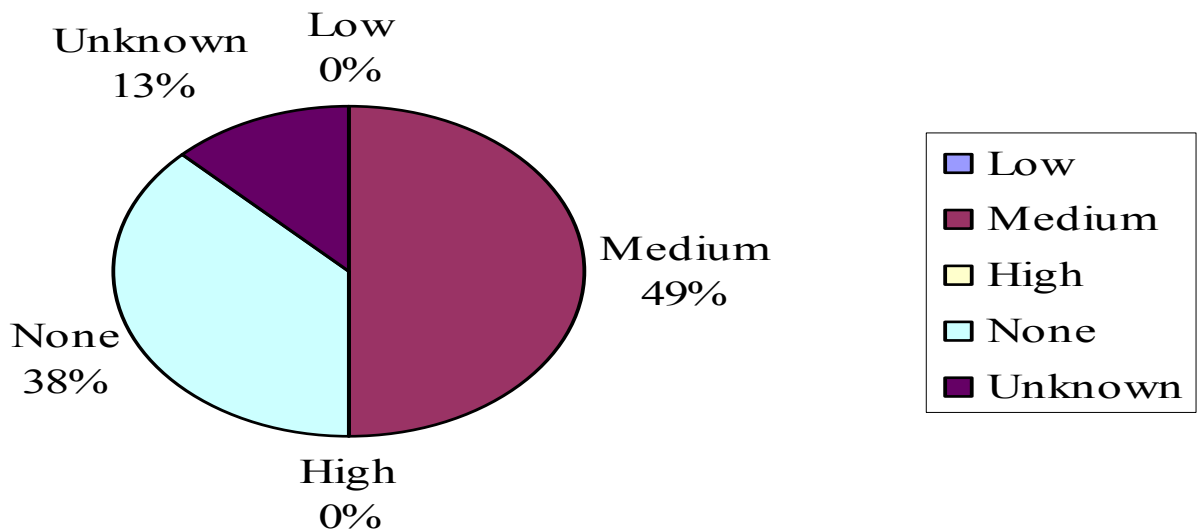
Summary: Low = 1, Medium = 2, High = 0, None = 4, Unknown = 0, N/A = 0

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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Real ID Act Impact Analysis Results

Requirement N: Subject all person's authorized to manufacture or produce DL/ID cards to appropriate security clearance requirements.		
Jurisdiction	Impact	Comments
Alberta	MEDIUM	
British Columbia	NO RESPONSE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	NONE	
Nunavut	MEDIUM	
Ontario	MEDIUM	
Prince Edward Island	UNKNOWN	
Quebec	NONE	
Saskatchewan	NONE	
Yukon	MEDIUM	



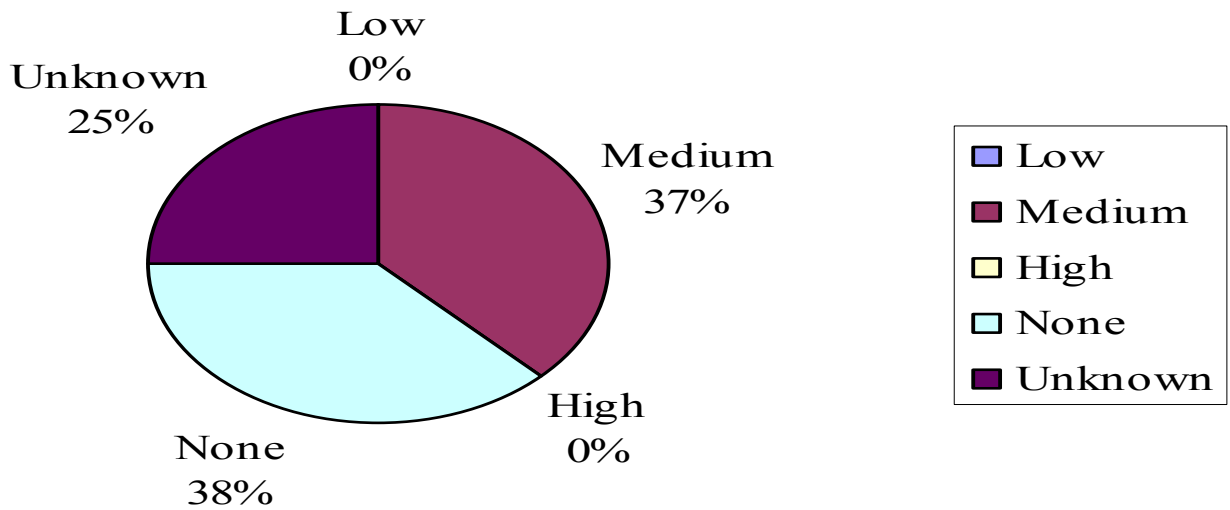
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Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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Real ID Act Impact Analysis Results

Requirement O: Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards.		
Jurisdiction	Impact	Comments
Alberta	UNKNOWN	
British Columbia	NO REPOSE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	UNKNOWN	
Nunavut	MEDIUM	
Ontario	MEDIUM	
Prince Edward Island	NONE	
Quebec	NONE	
Saskatchewan	MEDIUM	
Yukon	NONE	



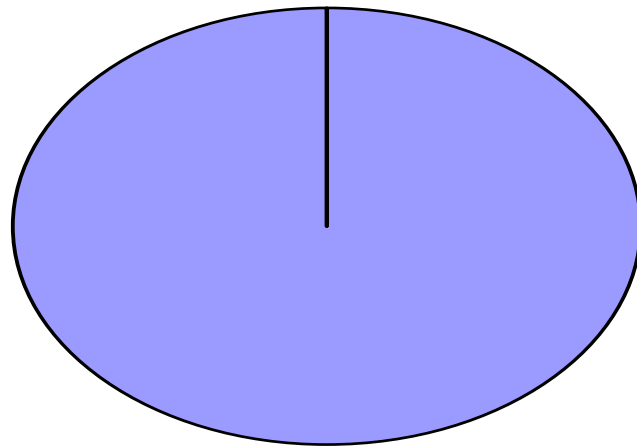
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Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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Real ID Act Impact Analysis Results

Requirement P: Limit period of validity of DL/ID cards that are not temporary to a period not exceeding 8 years.		
Jurisdiction	Impact	Comments
Alberta	NO RESPONSE	
British Columbia	NONE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	NONE	
Nanavut	NONE	
Ontario	NONE	
Prince Edward Island	NONE	
Quebec	NONE	
Saskatchewan	NONE	
Yukon	NONE	



None
100%

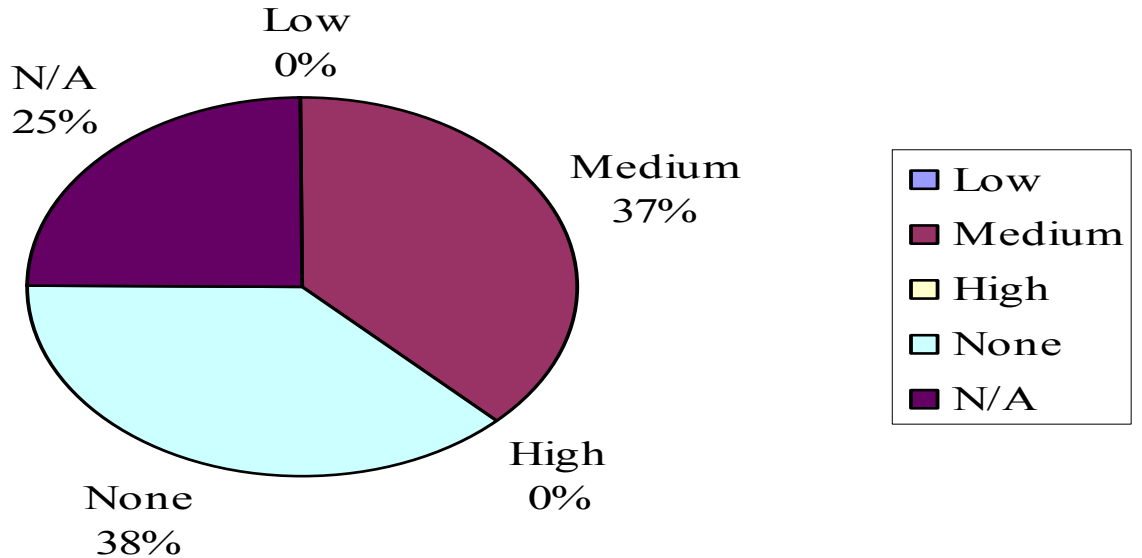
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Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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Real ID Act Impact Analysis Results

Requirement Q: Alternative document design if it does not meet federal standard/		
Jurisdiction	Impact	Comments
Alberta	N/A	
British Columbia	NO RESPONSE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	N/A	
Nunavut	MEDIUM	
Ontario	NONE	
Prince Edward Island	NONE	
Quebec	NONE	
Saskatchewan	MEDIUM	
Yukon	MEDIUM	



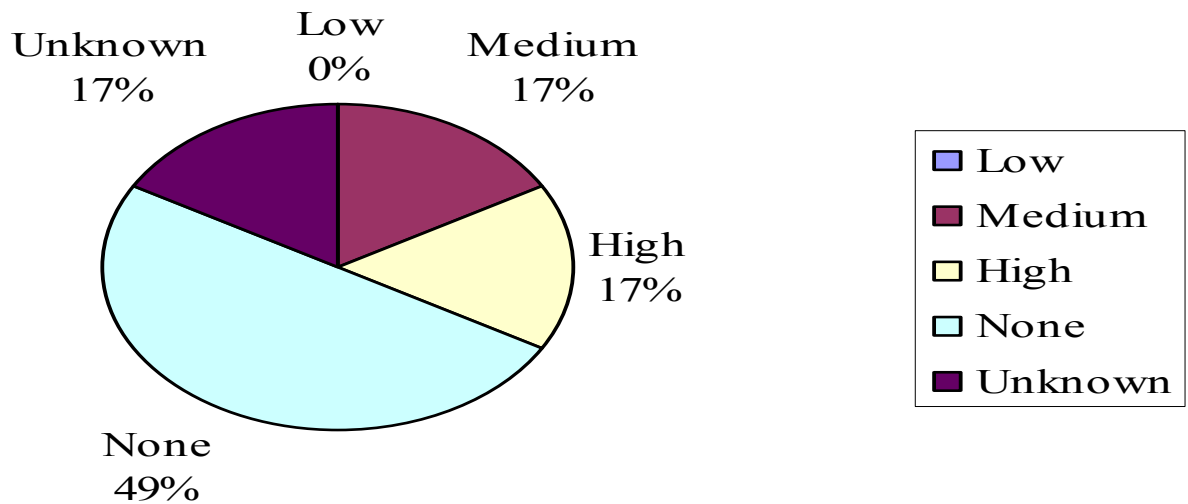
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Low = Requires some policy changes **Medium** = Policy changes, computer programming **None** = Already in place
High = Major reprogramming, training, legislation/major costs **Unknown** = Need more information to determine impact
N/A = Not applicable **No Response** = No comments provided on this requirement

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Real ID Act Impact Analysis Results

Requirement R: Legal Presence Requirement.		
Jurisdiction	Impact	Comments
Alberta	NO RESPONSE	
British Columbia	NO RESPONSE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	NO RESPONSE	
Nunavut	MEDIUM	
Ontario	HIGH	
Prince Edward Island	NONE	
Quebec	NONE	
Saskatchewan	UNKNOWN	
Yukon	NONE	



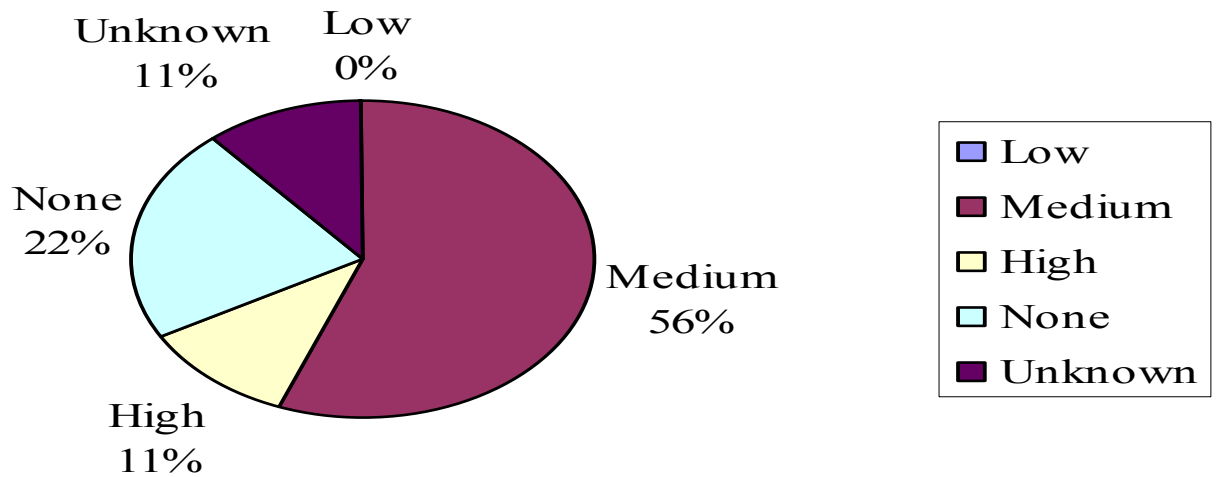
Summary: Low = 0, Medium = 1, High = 1, None = 3, Unknown = 1, N/A = 0

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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Real ID Act Impact Analysis Results

Requirement S: Provide electronic access to all other states to information contained in the motor Vehicle database of the state.		
Jurisdiction	Impact	Comments
Alberta	MEDIUM	
British Columbia	NONE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	NONE	
Nunavut	MEDIUM	
Ontario	MEDIUM	
Prince Edward Island	UNKNOWN	
Quebec	MEDIUM	
Saskatchewan	MEDIUM	
Yukon	HIGH	



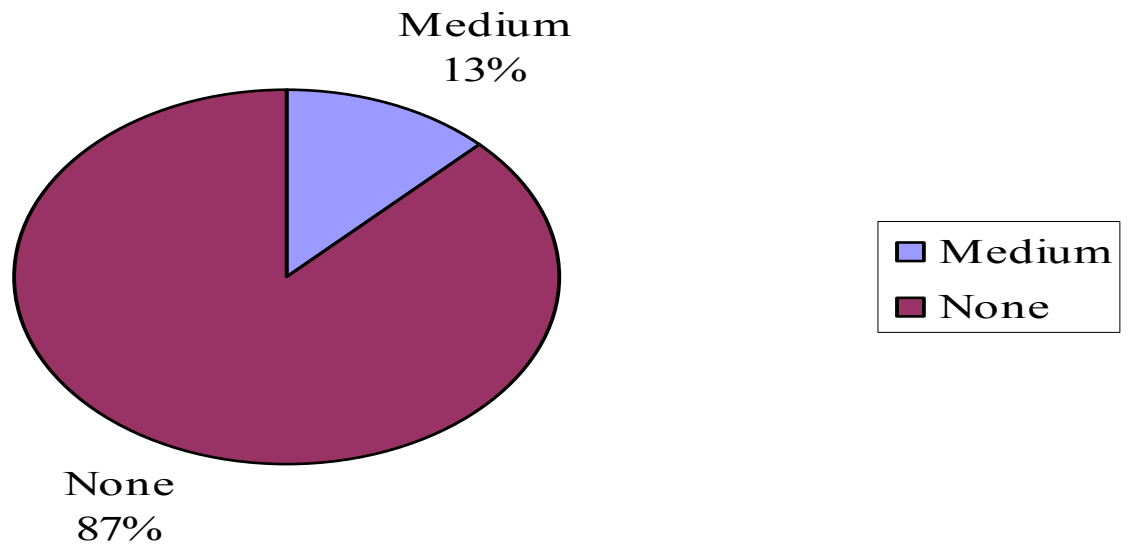
Summary: Low = 0, Medium = 5, High = 1, None = 2, Unknown = 1, N/A = 0

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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Real ID Act Impact Analysis Results

Requirement T: Maintain a state motor vehicle database that contains at a minimum. (See detailed appendix).		
Jurisdiction	Impact	Comments
Alberta	NO RESPONSE	
British Columbia	NONE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	MEDIUM	
Nunavut	NONE	
Ontario	NONE	
Prince Edward Island	NONE	
Quebec	NONE	
Saskatchewan	NONE	
Yukon	NONE	



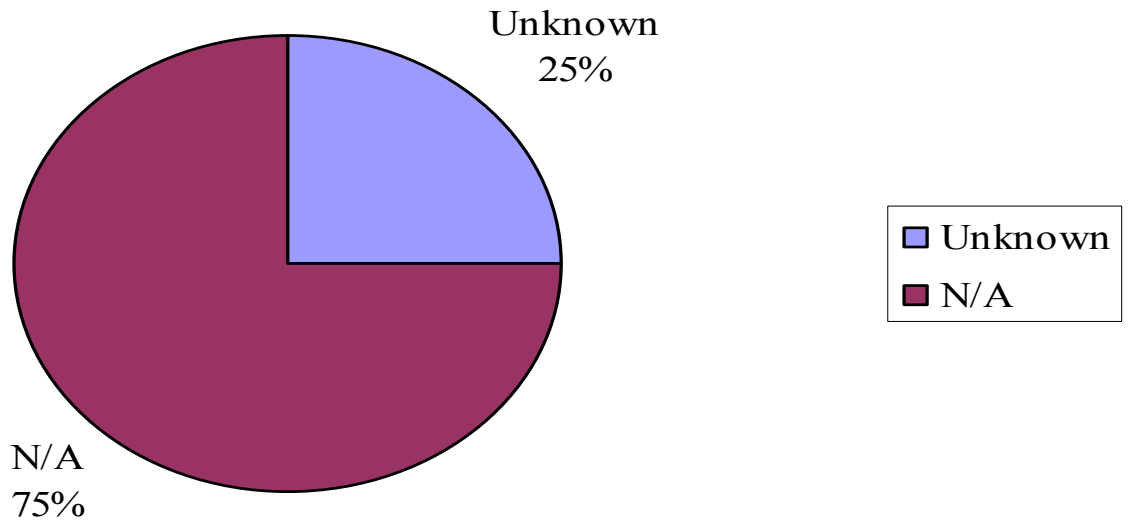
Summary: Low = 0, Medium = 1, High = 0, None = 7, Unknown = 0, N/A = 0

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	

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Real ID Act Impact Analysis Results

Requirement U: Optional: Development and issuance of a certificate of driving – not for federal identification purposes – for those who cannot prove lawful presence.		
Jurisdiction	Impact	Comments
Alberta	N/A	
British Columbia	NO RESPONSE	
Manitoba		
New Brunswick		
Newfoundland and Labrador		
Northwest Territories		
Nova Scotia	N/A	
Nunavut	N/A	
Ontario	UNKNOWN	
Prince Edward Island	UNKNOWN	
Quebec	N/A	
Saskatchewan	N/A	
Yukon	N/A	



Summary: Low = 0, Medium = 0, High = 0, None = 0 Unknown = 2, N/A = 6

Low = Requires some policy changes	Medium = Policy changes, computer programming	None = Already in place
High = Major reprogramming, training, legislation/major costs	Unknown = Need more information to determine impact	
N/A = Not applicable	No Response = No comments provided on this requirement	