

Virginia Department of Motor Vehicles

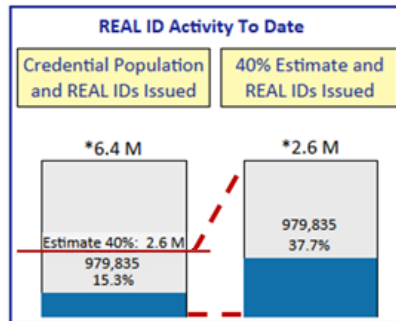
# REAL ID Quarterly Implementation Report: October 1 – December 31, 2019

# REAL ID Quarterly Report (October 1-December 30, 2019) – Executive Summary

## REAL ID Results from October 1, 2018 – December 31, 2019

Credentials Issued			
		Standard	REAL ID
2018	Q4	278,396	118,526
2019	Q1	290,233	136,303
	Q2	273,939	183,061
	Q3	287,994	244,876
	Q4	230,148	297,069
<b>To Date:</b>		<b>1,360,710</b>	<b>979,835</b>

Percent REAL ID			
2018	Q4	29.9%	
2019	Q1	32.0%	
	Q2	40.1%	
	Q3	46.0%	
	Q4	56.3%	
<b>To Date:</b>		<b>41.9%</b>	



Total Customers (all Transactions)		
Year	Quarter	Count
2018	Q1	1,244,326
	Q2	1,317,792
2019	Q3	1,289,149
	Q4	1,393,112
2017	Q1	1,147,405
	Q2	1,158,138
2019	Q3	1,267,571
	Q4	1,267,571

Wait Time (all Transactions)		
Year	Quarter	Time
2018	Q1	00:24:14
	Q2	00:24:35
2019	Q3	00:30:52
	Q4	00:37:52
2017	Q1	00:21:16
	Q2	00:34:53
2019	Q3	00:32:09
	Q4	00:32:09

Serve Time (all Transactions)		
Year	Quarter	Time
2018	Q1	00:09:49
	Q2	00:09:44
2019	Q3	00:09:56
	Q4	00:10:33
2017	Q1	00:09:48
	Q2	00:10:39
2019	Q3	00:10:36
	Q4	00:10:36

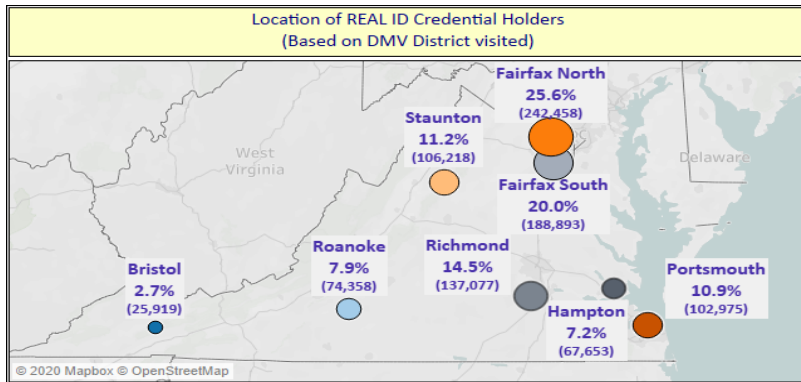
\*Based on original projections

REAL IDs Issued by District					
	2018		2019		
	Q4	Q1	Q2	Q3	Q4
Fairfax North	31,412	34,557	46,631	60,725	69,133
Fairfax South	22,001	25,012	35,301	49,816	56,763
Richmond	16,552	18,667	24,563	32,998	44,297
Portsmouth	12,772	14,493	19,439	24,917	31,354
Staunton	13,310	15,180	19,716	26,796	31,216
Roanoke	8,914	10,545	14,183	18,117	22,599
Hampton	8,100	9,509	11,997	16,256	21,791
Mobile Operations	2,224	4,378	6,513	9,001	12,168
Bristol	3,241	3,962	4,718	6,250	7,748
<b>Statewide Total</b>	<b>118,526</b>	<b>136,303</b>	<b>183,061</b>	<b>244,876</b>	<b>297,069</b>

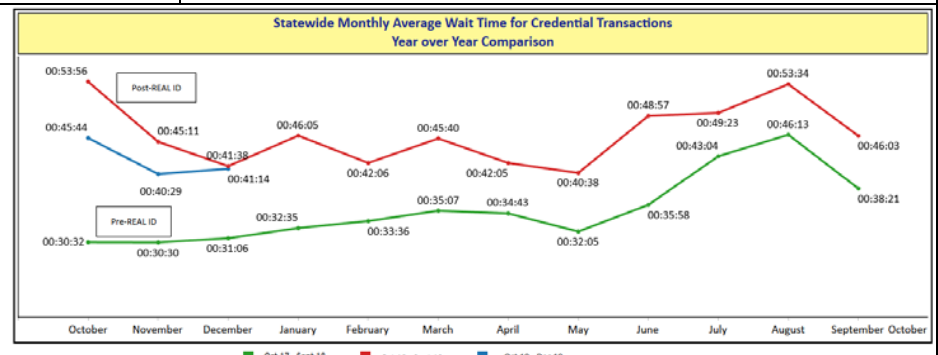
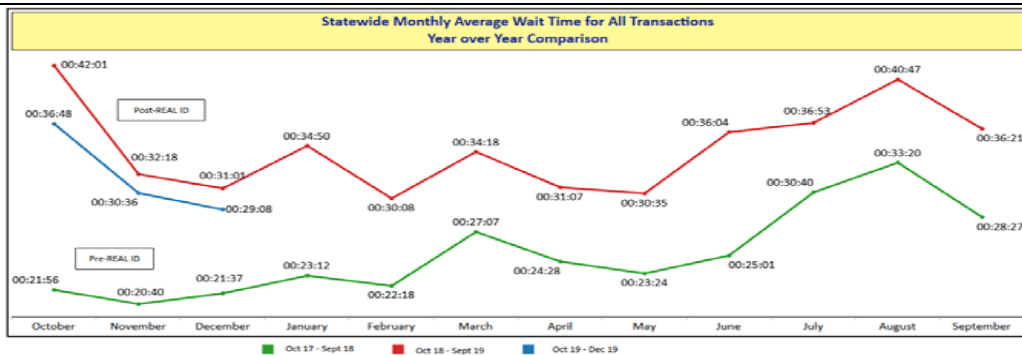
Percent of Credentials REAL ID					
	2018		2019		
	Q4	Q1	Q2	Q3	Q4
Mobile Operations	31.7%	44.5%	55.0%	63.3%	75.2%
Fairfax North	44.7%	47.7%	56.7%	62.5%	70.1%
Fairfax South	34.7%	38.3%	48.9%	56.0%	65.1%
Staunton	31.0%	34.0%	40.6%	46.9%	55.9%
Hampton	25.5%	27.5%	33.3%	39.2%	52.5%
Richmond	23.4%	24.3%	31.0%	36.2%	48.9%
Portsmouth	24.5%	25.2%	32.8%	37.2%	48.3%
Roanoke	22.1%	23.7%	30.6%	34.9%	44.9%
Bristol	17.5%	18.7%	22.1%	26.2%	35.2%
<b>Statewide %</b>	<b>29.9%</b>	<b>32.0%</b>	<b>40.1%</b>	<b>46.0%</b>	<b>56.3%</b>

### REAL ID Highlights and Issues:

- From October 1, 2018 to December 31, 2019, DMV issued 979,835 REAL IDs. This is 37.7% of the total number of customers expected to get a REAL ID credential.
- All eight DMV districts and DMV's mobile operations experienced an increase in the overall number and percentage of REAL ID credentials issued this quarter.
- Although DMV has implemented numerous process improvements, decreased REAL ID serve times, and increased facility capacity, increasing customer volume continues to adversely affect wait times. Offices in the urban crescent are particularly hard hit with longer than usual wait times.
- The Governor's proposed 2020-2022 Budget (House Bill 30/Senate Bill 30, Introduced) and 2018-2020 Budget (House Bill 29/Senate Bill 29, Introduced) provide an additional 100 positions to DMV for REAL ID, which will help address extended wait times. If approved by the General Assembly, these additional positions, funded through existing revenue from REAL ID fees, will allow DMV to fully staff service windows at its offices in the urban crescent.
- REAL ID start-up and operating expenses during the first 15 months of implementation totaled \$9 million; DMV collected \$9.7 million in REAL ID surcharges.
- U.S. Department of Homeland Security (DHS) has begun a review to determine if changes to the REAL ID issuance process are needed.



The majority of REAL ID credentials have been issued in the two Northern Virginia districts and Richmond district.



## REAL ID Completed and Planned Actions

Facility Adjustments	Mobile Operations	Public Relations	Process Improvements	Staffing
<ul style="list-style-type: none"> <li>• Customer service centers (CSCs) renovated to increase the number of customer windows and enhance efficiencies include: Fairfax Westfields with six additional windows (October) and Alexandria with five additional windows (currently underway).</li> <li>• Future renovations include: Charlottesville (February), Hampton (April), Waynesboro (April), Norfolk-Military Circle (May), Norfolk-Widgeon Road (August), East Henrico (October), Virginia Beach-Bucker (November), and Chesterfield (December).</li> <li>• Future relocations include: Leesburg (June), Lexington (July), and Sterling (September).</li> <li>• Negotiations are underway for a second DMV Select in the Hampton district.</li> </ul>	<ul style="list-style-type: none"> <li>• DMV has a total of 12 mobile operations units - eight Connect teams and four DMV2Go mobile CSCs.</li> <li>• DMV's mobile operations teams have been an effective way to serve REAL ID customers, having issued more than 34,000 REAL IDs since October 1, 2018.</li> <li>• During this quarter, DMV mobile operations conducted visits to government centers, private businesses, universities, retirement communities, and DMV Selects, among other locations.</li> <li>• During the quarter, DMV Connect teams expanded their presence in airports. Teams have visited Dulles International and Reagan National airports multiple times through partnerships with United Airlines and American Airlines.</li> <li>• As of October 1, 2019, the DMV Connect teams began offering REAL IDs to inmates through the Department of Corrections.</li> <li>• DMV resumed DMV Connect appointment-based visits in November.</li> </ul>	<ul style="list-style-type: none"> <li>• DMV continued to use a wide range of communications channels to educate the public including:               <ul style="list-style-type: none"> <li>➤ news releases;</li> <li>➤ signage and brochures at CSCs, DMV Selects, and airports;</li> <li>➤ DMV webpage;</li> <li>➤ information included in driver's license and vehicle renewal notices;</li> <li>➤ social media messaging;</li> <li>➤ information sharing through stakeholder groups, including legislators;</li> <li>➤ speakers and informational tables at a variety of events; and</li> <li>➤ press events with Department of Homeland Security (DHS) and Transportation Security Administration (TSA).</li> </ul> </li> <li>• Throughout the quarter, press events were held at Dulles International, Reagan National, and Richmond International airports alerting the public about REAL ID. In particular, on October 1<sup>st</sup> - the one-year mark until REAL ID enforcement begins, TSA held a press conference at Reagan National Airport with DMV Commissioner Holcomb and airline industry representatives in attendance.</li> <li>• The DMV Communications team continued its media campaign, "Get on Board with REAL ID," which included a paid social media marketing campaign.</li> <li>• On December 9, 2019, DMV held a press event with Congressman Gerald Connolly where he successful applied for his REAL ID.</li> </ul>	<ul style="list-style-type: none"> <li>• DMV continued to expand remote processing technology. CSCs in urban areas electronically transmit their daily document preparation work to more rural areas, allowing more staff time in urban office for direct customer service. Sixty-nine CSCs now participate in this process.</li> <li>• At selected CSCs, DMV Law Enforcement agents have begun administering road tests on Saturdays.</li> <li>• DMV's remote knowledge testing program has expanded to include 117 schools, increasing three-fold the number of remote tests conducted.</li> <li>• On December 20<sup>th</sup>, DMV began accepting Google Pay and Apply Pay in CSCs, allowing for quicker payment of DMV transactions.</li> </ul>	<ul style="list-style-type: none"> <li>• DMV continued to work diligently on hiring additional staff this quarter to address staff shortages caused by high turnover rates.</li> <li>• Despite progress in hiring, DMV remains concerned with staffing and still must rely on overtime by field staff in order to meet customer demand.</li> <li>• With wait times increasing, particularly in Northern Virginia, it is clear that current staffing levels will not be sufficient to serve the large increase in customers anticipated to visit DMV offices in 2020.</li> <li>• The Governor included in his introduced 2020-2022 Budget and amendments to the 2018-2020 Budget an additional 100 classified positions to DMV for REAL ID. These positions will enable DMV to fully staff existing and planned service windows in busy offices.</li> </ul>

## **I. Report Purpose**

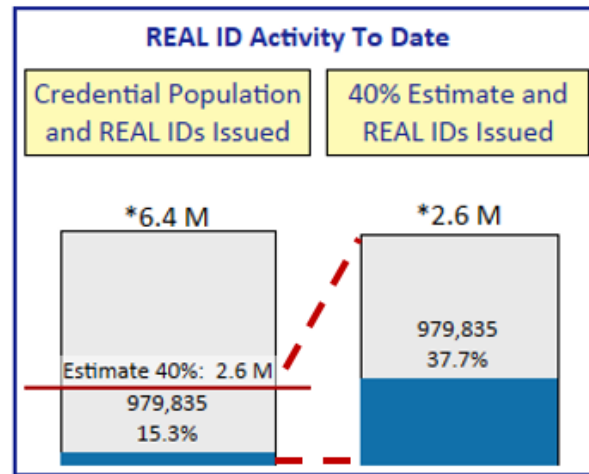
In accordance with the 2018 Appropriations Act, the Department of Motor Vehicles (DMV) submits the following quarterly report to the Senate Finance and House Appropriations Committees concerning the roll-out of REAL ID in Virginia. This report covers REAL ID-related efforts conducted by DMV during the period of October 1, 2019, to December 31, 2019, which includes the 13th, 14th, and 15th months of the 24-month REAL ID roll-out period. The first four quarterly reports can be found at [DMV REAL ID Implementation 1st Quarter Report](#), [DMV REAL ID Implementation 2nd Quarter Report](#), [DMV REAL ID Implementation 3rd Quarter Report](#), and [DMV REAL ID Implementation 4th Quarter Report](#).

## **II. REAL ID Roll-out**

In the most recent quarter of REAL ID implementation (October 1, 2019, to December 31, 2019), DMV continued to experience an increase in the number and percentage of REAL ID-compliant driver's licenses and ID cards issued. Toward the end of 2018, about 28% of credential customers, approximately 1,600 a day, were issued REAL ID credentials. With substantial publicity surrounding the one-year mark prior to federal enforcement, the rate of issuance since October 1, 2019, has spiked up to 55% or more, with more than 4,000 REAL IDs issued per day. By the end of December, DMV was often issuing 6,000 or more REAL ID-compliant credentials a day. In fact, late December saw a number of record days for high volumes of REAL IDs issued. On December 30<sup>th</sup> DMV experienced the highest one-day issuance level for REAL IDs, with 6,367 customers obtaining a REAL ID. The Tysons Corner Customer Service Center (CSC) processed 298 REAL IDs on December 26<sup>th</sup>, a new one-day record for an individual CSC. On that same day, 62.6% of credentials issued statewide were REAL ID compliant, also a new record. As REAL ID volumes continue to increase, DMV will likely issue the one-millionth REAL ID in early January.

Based on the experiences of other states and Virginians' potential need for REAL ID-compliant credentials, when planning for REAL ID implementation DMV staff estimated that approximately 40% of its credential customers, or 2.6 million customers, would decide to obtain a REAL ID-compliant driver's license or identification (ID) card. As of December 31, 2019, approximately 37.7% of the customers that DMV estimated may obtain a REAL ID had successfully applied for a REAL ID credential, or 15.3% of DMV's total credentialed population (Chart 1).

Chart 1: REAL ID Activity for the First 15 Months of Implementation



*\*Based on original projections*

To meet this customer demand, DMV has increased its capacity, in part, through a gradual decrease in REAL ID customer serve times, an increase in office windows available to handle REAL ID transactions, and an increase in field staff available to serve customers. Additionally, DMV is strategically deploying communications campaigns to manage REAL ID customer volume, with its current campaign encouraging customers to come to a CSC sooner rather than waiting until the deadline approaches, when offices are expected to be exceptionally busy. DMV has also continued to implement new and/or expanded processes that enhance work efficiencies.

These efforts were expected to mitigate any spikes in customer volumes that would result in dramatic wait time increases, and they have had a positive impact statewide. However, some customers are experiencing noticeably longer wait times than prior to REAL ID implementation. While statewide a relatively low 1.8%, or 20,526 customers total, experienced wait times greater than two hours during the past quarter (down 15,543 customers as compared to the previous quarter), some offices experienced periods in which wait times exceed two hours in spite of the process improvements put into place since implementation. During this quarter, 55% of customers who experienced a wait time of two hours or more live in the Fairfax North or Fairfax South Districts. An additional 35% were served in Richmond and Portsmouth District offices. These are also the districts with the highest volumes of REAL IDs issued.

DMV strives to provide superior service to its customers, and having any customers wait more than two hours for service is well beyond DMV’s desired goal. The Governor’s proposed 2020-2022 Budget (House Bill 30/Senate Bill 30, Introduced) and 2018-2020 Budget (House Bill 29/Senate Bill 29, Introduced) provide an additional 100 positions to DMV for REAL ID, which will help address extended wait times. If approved by the General Assembly, these additional positions, funded through existing revenue from REAL ID fees, will allow DMV to fully staff service windows at its offices in the urban crescent. (DMV has more service windows than staff

to work at those windows.) The additional staff will enable DMV to maximize use of its current facility capacity and, in addition, allow the agency to expand its use of DMV Connect teams (DMV “in a suitcase”) and take service into communities across the state to address REAL ID customer demand.

A. Volume of REAL ID Credentials Issued

DMV has experienced a consistent increase in the volume and percentage of REAL ID credentials issued from quarter to quarter. During the most recent quarter, DMV issued 297,069 REAL ID credentials, accounting for 56.3% of credentials issued by DMV’s CSCs – the first quarter in which the majority of credentials issued were REAL ID compliant. Chart 2 provides an overview of DMV REAL ID transaction volumes through the first 15 months of implementation, by quarter.

Chart 2: REAL ID Credentials Issued in CSCs, by Quarter  
(October 1, 2018 – December 31, 2019)

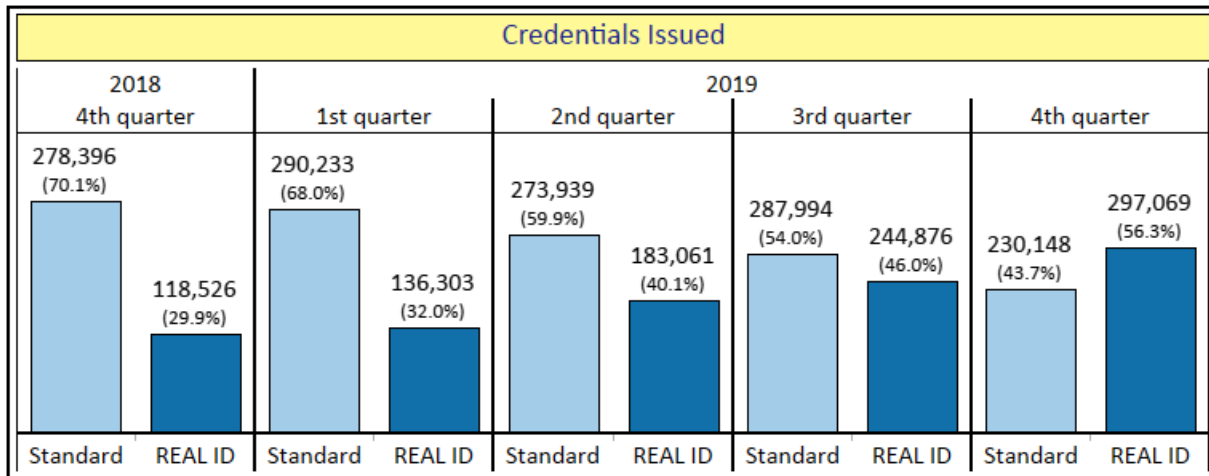
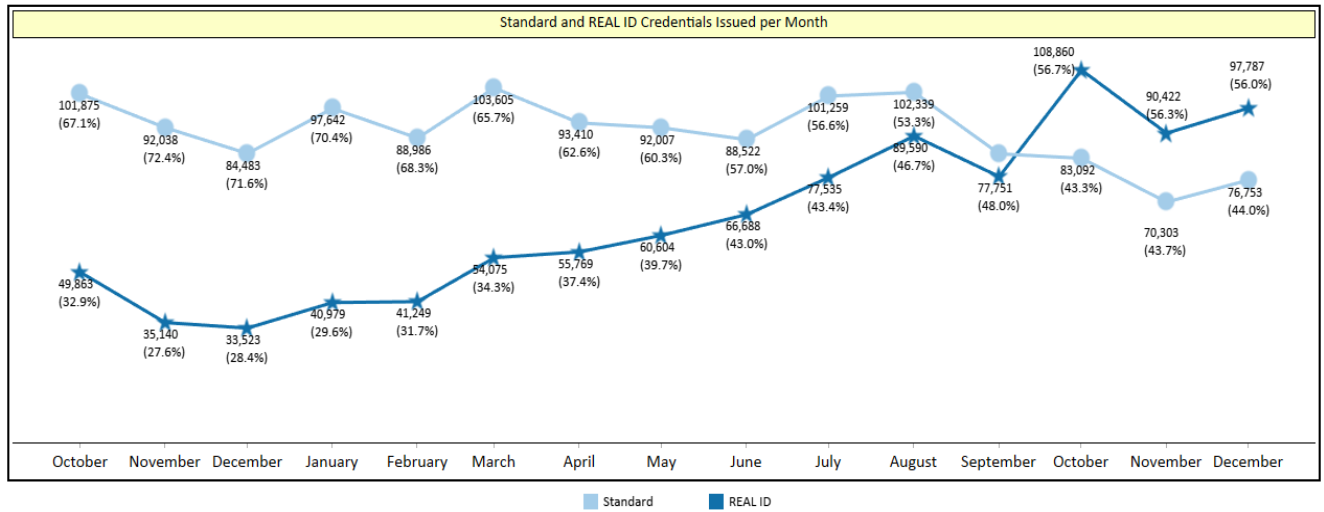


Chart 3 displays the monthly REAL ID credential volumes since REAL ID implementation. After a month-to-month decline in REAL IDs issued in the first three months of the roll-out, issuance began steadily increasing month after month during 2019. Since October 2019, DMV has consistently issued more REAL IDs than standard credential types each month. October 2019 saw the most REAL IDs issued in any month (108,860) and the highest proportion of credentials issued that were REAL ID compliant, at 57%.

Chart 3: Standard and REAL ID Credentials Issued per Month  
(October 1, 2018 – December 31, 2019)



Two trends are contributing to the increase in REAL IDs issued. First, DMV has seen an increase in the number of customers visiting a CSC outside of their normal renewal cycle to obtain replacement credentials that are REAL ID compliant. Also, more customers are coming in to renew their driver’s license earlier than they have in the past. Customers are able to renew their credential up to 12 months in advance; however, historically, most customers renew within a month of expiration. DMV is now seeing more customers who are opting to renew several months in advance, which is a positive trend, as it lessens (albeit only moderately) the expected very high volume of customers expected as the October 1, 2020, enforcement deadline approaches. These trends suggest that Virginians are increasingly responding to REAL ID messaging encouraging customers to obtain their REAL ID-compliant driver’s license or ID card.

DMV has continued to see an increase in the number of REAL ID credentials issued by all eight of its districts and its mobile operations during this past quarter (Table 1). Additionally, while some districts issue REAL IDs at substantially higher proportions than other districts, all districts experienced an increase in their percentage of REAL ID transactions compared to previous quarters. The overall number of REAL ID credentials issued statewide this last quarter more than doubled over the first quarter of implementation (Q4 2018).



Table 1: REAL ID Credentials Issued by District

REAL IDs Issued by District						Percent of Credentials REAL ID					
	2018	2019					2018	2019			
	Q4	Q1	Q2	Q3	Q4		Q4	Q1	Q2	Q3	Q4
Fairfax North	31,412	34,557	46,631	60,725	69,133	Mobile Operations	31.7%	44.5%	55.0%	63.3%	75.2%
Fairfax South	22,001	25,012	35,301	49,816	56,763	Fairfax North	44.7%	47.7%	56.7%	62.5%	70.1%
Richmond	16,552	18,667	24,563	32,998	44,297	Fairfax South	34.7%	38.3%	48.9%	56.0%	65.1%
Portsmouth	12,772	14,493	19,439	24,917	31,354	Staunton	31.0%	34.0%	40.6%	46.9%	55.9%
Staunton	13,310	15,180	19,716	26,796	31,216	Hampton	25.5%	27.5%	33.3%	39.2%	52.5%
Roanoke	8,914	10,545	14,183	18,117	22,599	Richmond	23.4%	24.3%	31.0%	36.2%	48.9%
Hampton	8,100	9,509	11,997	16,256	21,791	Portsmouth	24.5%	25.2%	32.8%	37.2%	48.3%
Mobile Operations	2,224	4,378	6,513	9,001	12,168	Roanoke	22.1%	23.7%	30.6%	34.9%	44.9%
Bristol	3,241	3,962	4,718	6,250	7,748	Bristol	17.5%	18.7%	22.1%	26.2%	35.2%
<b>Statewide Total</b>	<b>118,526</b>	<b>136,303</b>	<b>183,061</b>	<b>244,876</b>	<b>297,069</b>	<b>Statewide %</b>	<b>29.9%</b>	<b>32.0%</b>	<b>40.1%</b>	<b>46.0%</b>	<b>56.3%</b>

Note: A map of the Commonwealth showing where DMV's districts are located is included in Appendix A.

Throughout REAL ID roll-out, CSCs in the Northern Virginia area have issued the most REAL IDs. Of DMV's 75 offices, nine of the top ten CSCs by REAL ID credential volume were located in Northern Virginia (Fairfax North and Fairfax South Districts). This past quarter, several CSCs located in the suburbs of Richmond, as well as the Charlottesville and Roanoke CSCs, also issued substantial numbers of REAL IDs. Fort Lee and Williamsburg CSCs continued to place within the top ten, along with Northern Virginia offices, in terms of the percentage of credentials issued that were REAL ID compliant. Table 2 provides lists of the top ten offices by number and percentage of REAL IDs issued, while Appendix B provides comparable information for all CSCs.

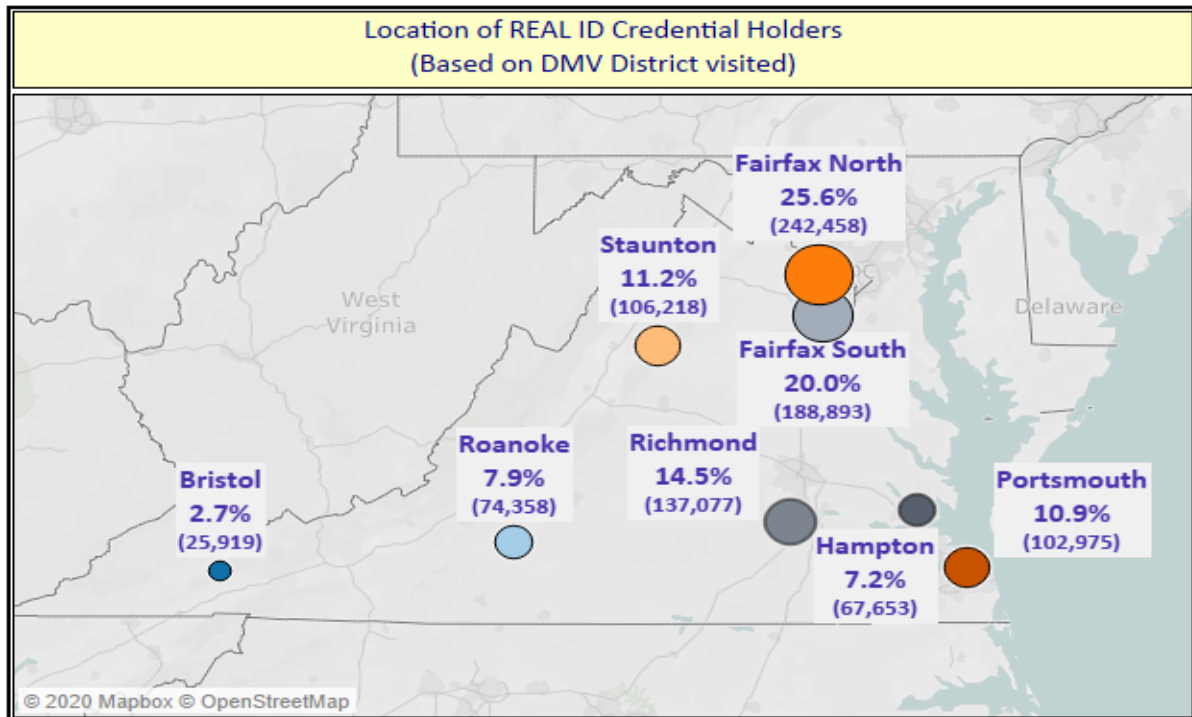
Table 2: Top 10 CSCs by Number and Percent of REAL ID Credentials Issued, October 1, 2018, through December 31, 2019

Top 10 CSCs based on the Number of REAL ID Credentials Issued		Top 10 CSCs based on the Percent of REAL ID Credentials Issued	
Tysons Corner	43,374	Pentagon	79.5%
Fair Oaks	40,744	Metro at VA Square	68.7%
Fairfax Westfields	35,539	Fairfax Westfields	62.4%
Leesburg	34,005	Leesburg	61.2%
Sterling	32,845	Fort Lee	57.8%
Woodbridge	31,963	Fair Oaks	57.6%
Arlington	30,548	Warrenton	57.0%
Franconia	29,817	Sterling	55.8%
Prince William/Manassas	27,236	Alexandria	54.2%
West Henrico	27,229	Williamsburg	52.4%



The variation in issuance rates across the state is reflected in the map below, which visually shows where current REAL ID credential holders reside (Figure 1). Not surprisingly, most REAL ID holders live in the eastern half of the state, with almost half living in Northern Virginia.

Figure 1: Location of Current REAL ID Credential Holders



#### B. Customer Wait Times and Serve Times

As previously noted, DMV continued to experience high customer volumes this past quarter. Increased customer volume adversely affects wait times. Additionally, the REAL ID credential transaction is one of the most time-consuming DMV transactions due to the steps required to process the credential in accordance with federal requirements. To counter these effects, DMV has taken steps to streamline service and increase staff capacity (discussed in Section III of this report); however, in certain parts of the state, REAL ID demand is straining the increased resource capacity. This strain is reflected in higher than desired customer wait times.

Charts 4 and 5 demonstrate the impact REAL ID implementation has had on average wait time on a month-by-month basis. While wait times this past quarter were lower than when REAL ID was first implemented, customers continue to experience more elevated wait times compared to comparable months prior to REAL ID implementation.

Chart 4: Statewide Average Wait Times for All Transactions, by Month

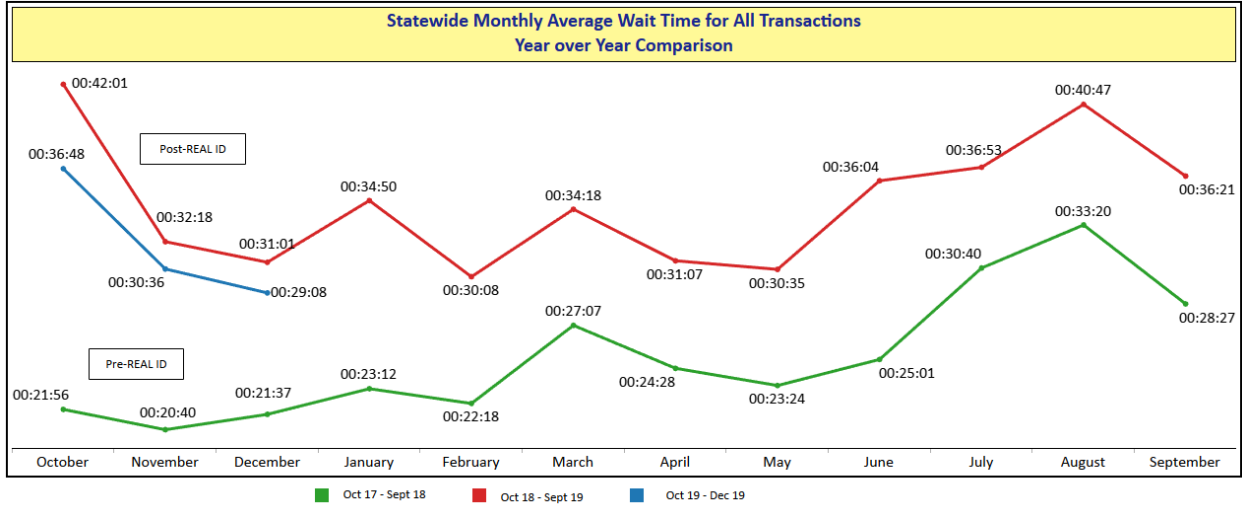
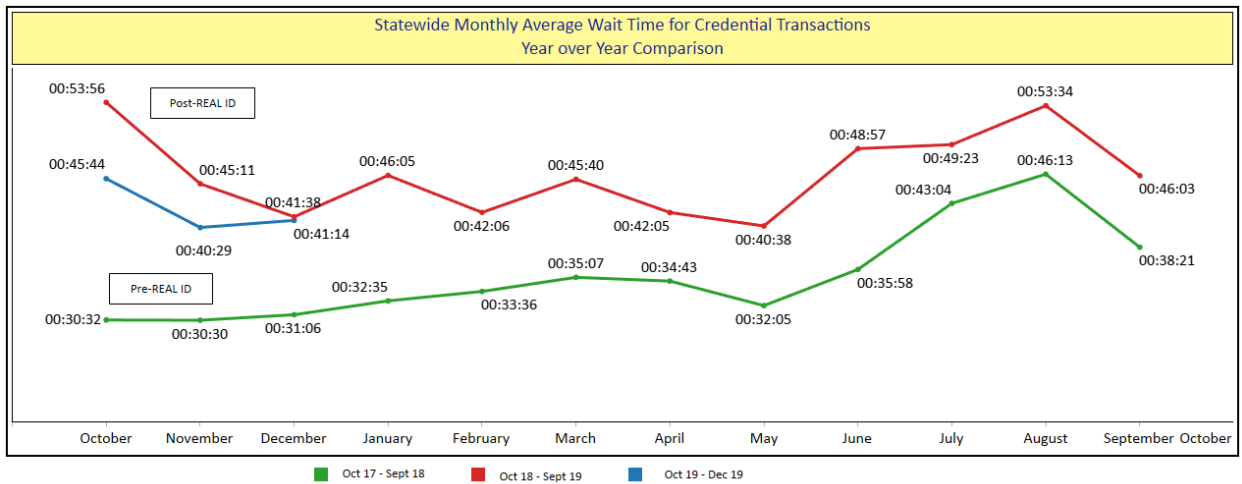
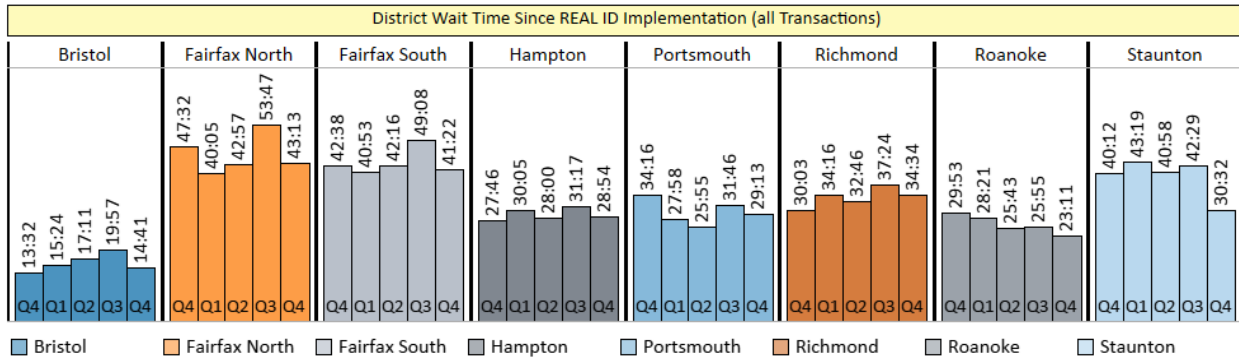


Chart 5: Statewide Average Wait Times for Credential Transactions, by Month



Given variation in the volume of REAL IDs issued across the state, average wait time increases also varied by district. Chart 6 shows the average wait times, by district, for each of the quarters since REAL ID began. Not surprisingly, the very busy offices in Northern Virginia tend to have higher wait times. While the average wait times decreased this fall, as more and more REAL IDs are being processed in these offices in the coming year, DMV anticipates that corresponding customer wait times will rise. The average wait time in the Fairfax North District this past quarter was about 43 minutes, while the Fairfax South District saw an average wait time of about 41 minutes. Even with all of the process improvements and increased staffing that have been put in place for REAL ID implementation, it is clear that additional staff resources will be needed to meet the growing demand for REAL ID credentials.

Chart 6: District Average Wait Times since REAL Implementation, by Quarter



In June, DMV began experiencing periodic spikes in the number of customers waiting two hours or more. (Note: Wait times are measured from the point at which customers receive a ticket at the Information Desk to when they are called to the front counter for service.) Statewide this past quarter, 20,526 of 1.1 million customers waited at least two hours for service. The largest proportion of customers waiting more than two hours was in the Fairfax North and South Districts – 11,335 of 376,595 total customers served waited two hours or more before being served. While overall, a relatively small proportion of customers have extended wait times, the actual number of customers with long waits, particularly in Northern Virginia, is significant.

In August 2018 – before REAL ID implementation – driver transactions made up about 43% of total transactions statewide. By November 2019, due to the increase in customers visiting DMV to obtain REAL ID credentials, the proportion of CSC transactions that were driver related was up to 50%. This is significant because driver transactions, particularly REAL ID transactions, take longer to process on average than most vehicle-related transactions. As DMV has successfully migrated many vehicle transactions, such as vehicle registration renewals, to other service outlets, these transactions have been replaced by the more time-consuming REAL ID transactions. In turn, longer average transaction times result in longer wait times for customers.

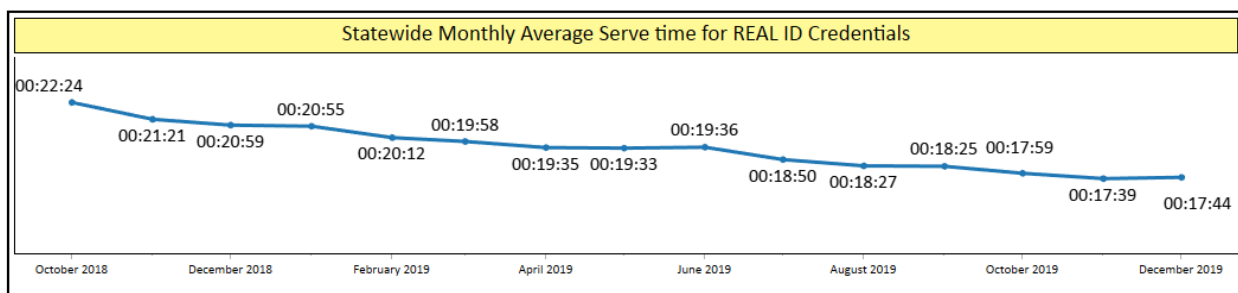
An additional factor contributing to higher wait times in CSCs is the increased demand for vital records since REAL ID was implemented. To satisfy REAL ID identity, legal presence, and name change requirements, vital records such as a birth and/or marriage certificate may be needed. Vital record transactions are relatively lengthy transactions, with an average serve time of 12 minutes. The need for vital records lengthens the overall customer experience during a REAL ID visit. DMV eliminates the need for the customer to leave and return another day with the additional documents by allowing the purchase of vital records on site. At this time, the Virginia DMV is the only DMV in the nation that offers customers the convenience of purchasing vital records on site.

From October 2019 through December 2019, the overall vital record transaction volume was 40% higher than the comparable period prior to REAL ID roll-out. Particularly noteworthy, the number of credential customers who also purchased a vital record during their transaction this past quarter increased by 149% compared to the same time period before implementation of REAL ID. This increased volume has resulted in DMV providing \$3.1 million in revenue to the Department of Health Division of Vital Records during the past 15 months – \$461,000 more than the same time period before REAL ID. It also provides more convenient service for the customer, but the result is even longer transaction times and wait times.

Further, all REAL ID customer transactions are motor-voter eligible transactions, meaning that DMV is required to offer customers the opportunity to apply to register to vote or update their voter information. DMV overall transaction time is often increased when a customer chooses to take advantage of this opportunity and answer all of the voting eligibility questions on the credit card terminal located at every CSC window. Since the implementation of REAL, DMV has seen an increase in the number of customers submitting voting applications and updates. The number of customers who completed a full motor voter transaction was 14,475 in December 2017, but rose to 46,646 in December 2019. This increase may be attributed both to an overall increase in motor-voter eligible transactions due to REAL ID as well as a change that was made to the motor voter process in September 2019.

One factor that continues to help moderate wait time is staff experience with processing REAL ID credentials. DMV employees have become increasingly proficient in handling the complicated REAL ID credential transactions. As a result, CSCs’ average serve times for REAL ID credentials have been decreasing statewide – by about four and a half minutes since REAL ID roll-out began (Chart 7). Serve times now appear to have leveled out at roughly 17 and a half minutes, but further serve time reductions are unlikely. While customer service representatives, in general, are more familiar with REAL ID transactions now, it is worth noting that some CSCs have an above average number of newer staff, which results in higher serve times (due to inexperience) and subsequently higher wait times at those CSCs.

Chart 7: Statewide Average Serve Time for REAL ID Credentials, by Month



*Note: Serve times reflect minutes and seconds.*

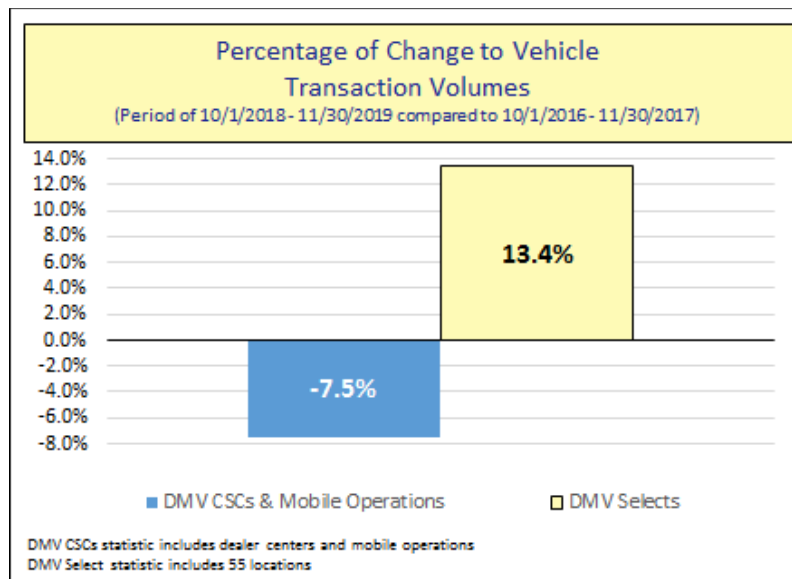
Throughout 2020, DMV will continue to focus on increasing agency capacity, given that DMV expects to see a substantially increasing number of customers seeking REAL IDs.

C. Expenditures and Revenue

As stated in previous REAL ID reports, DMV expended \$1,100,399 on REAL ID start-up costs. In addition to the start-up costs, DMV incurred approximately \$7,949,466 in REAL ID-related operating expenses since the program began in October 2018, for a total of \$9,049,865 in expenditures. Between October 1, 2018, and December 31, 2019, DMV collected \$9,798,350 from \$10 REAL ID surcharges. Based on the expenditures and revenue resulting from REAL ID implementation, DMV believes that the \$10 REAL ID surcharge is currently adequate to allow the agency to address all REAL ID-related expenditures over the long term, including the additional staff included in the Governor’s introduced budget.

Throughout REAL ID implementation, DMV has promoted the use of DMV Select offices as a means of decreasing customer traffic in CSCs. DMV Selects offer customers additional locations at which to complete their vehicle transactions and a limited number of driver transactions, such as address changes. DMV Selects are usually operated by local government offices and, in a few cases, private entities. DMV pays Selects a percentage of the revenues collected by the Selects. As can be seen in Chart 8, DMV Selects have seen a 13.4% increase in their transaction volume from October 1, 2018, through November 30, 2019, compared to the same timeframe prior to REAL ID implementation. As a result, the Selects have received an increase of approximately \$1,206,757 from DMV when compared to same time period pre-REAL ID implementation year, which is a 19% increase in compensation.

Chart 8: Change in Vehicle Transactions Conducted at DMV Selects



### **III. Ongoing Management of REAL ID**

DMV continued to actively monitor and manage the ongoing REAL ID roll-out through the fifth quarter of implementation. The following sections outline tasks accomplished and future tasks planned in five distinct management areas – facilities, mobile operations, public relations/communications, processes, and staffing.

#### **A. Facilities**

Over this past quarter of REAL ID implementation, DMV continued to undertake additional facility enhancements in order to streamline processes and increase office capacity. On October 3<sup>rd</sup>, the Fairfax/Westfields CSC was reopened after a major renovation was completed. The renovated office has six additional driver windows for a total of 20 service windows, 19 of which have cameras to be able to serve REAL ID customers. The Alexandria CSC is currently undergoing renovation to increase the number of service windows by five and to reconfigure the counters to better serve customers. This renovation should be complete by January 13, 2020. The renovations include putting cameras at all or most windows, placing printers in between each window so that representatives do not have to take time to walk to the back counter to retrieve printed documents, and adding more scanners for REAL ID documents. With the additional positions proposed in the Governor's budget, DMV will be able to fully staff all windows at the newly renovated offices.

DMV plans for a renovation of the Charlottesville CSC, tentatively scheduled for mid-February 2020, will result in two additional driver windows and six additional cameras. Looking forward, DMV also plans to renovate the following offices in 2020: Hampton (April), Waynesboro (April), Norfolk-Military Circle (May), Norfolk-Widgeon Road (August), East Henrico (October), Virginia Beach-Bucker Boulevard (November), and Chesterfield (December) and relocate the following offices in 2020: Leesburg (June), Lexington (July), and Sterling (September). All renovations and relocations will allow for increased customer capacity at those offices.

As was noted in the previous quarterly report, DMV must temporarily close the offices during renovations and office relocations. When this occurs, DMV temporarily reassigns front-counter staff members to other nearby offices in order to assist with the influx of customers that would usually visit the closed office.

In addition to increasing capacity at its own facilities, DMV has worked to expand the number of DMV Selects. Negotiations are underway for a new DMV Select location within the Hampton District, which could open mid-year 2020. Currently, DMV has 55 DMV Selects in operation. This is an increase of two in this past year.

## B. DMV Mobile Operations

One of the most effective ways to serve customers is through the DMV Mobile Operations program. DMV successfully operates two types of mobile customer service operations: four DMV2Go mobile units (customer service centers “on wheels”) and eight DMV Connect teams (DMV services “in a suitcase”). DMV Connect teams are particularly cost-effective and valuable in serving locations that do not have the space required for an external mobile unit. On the rare occasions that the teams are not conducting site visits, mobile operations staff assists in the CSCs.

DMV’s mobile teams have issued more than 34,000 REAL IDs since October 1, 2018. Mobile teams located in Northern Virginia are responsible for 47% of the total number of REAL IDs issued by these units. Recognizing the high volume of REAL ID customers in Northern Virginia, DMV added another Connect team in Fairfax County in August 2019. Should DMV receive additional resources as requested, the agency plans to add two more Connect teams in Northern Virginia, where CSCs are experiencing higher-than-normal customer traffic.

As part of the more than 1,900 mobile visits in 2019, DMV provided services at a broad range of locations and events, such as businesses, military bases, libraries, universities, community centers, courthouses, local government offices, and conferences. For example, in November, a DMV Connect team attended the CFA Institute in Charlottesville to offer REAL ID services to their employees. The visit was so successful a second visit was held in late December.

If a site proves to be particularly busy, DMV’s mobile operations will schedule regular visits to that site. The mobile teams have been encouraged to find sites where customers are particularly interested in obtaining REAL IDs, which help to relieve crowding at some of the CSCs. Recently, DMV scheduled multiple visits to Virginia Tech and James Madison University. Retirement communities are typically busy as well. For example, on a two-day visit in October to the Cedarfield Pinnacle Living Community, the Richmond Connect team processed over 300 REAL IDs.

Because the Connect teams are in such high demand, staff has reviewed all sites and transaction volumes, eliminating repeat visits to sites that have low volumes. When contact is made requesting DMV services, Connect team management requests that the new site provide a minimum of 100 customers per day. This helps ensure that Connect team resources are maximized.

The DMV Connect teams are continually working to expand their presence in airports, specifically to serve airport employees. In early 2019, a DMV Connect team began visiting Dulles International Airport on a regular basis to provide services to United Airlines employees. Most recently, the Connect Team expanded its service to United Airlines employees with



regularly scheduled visits to Reagan National Airport. On December 5<sup>th</sup> and 6<sup>th</sup>, the DMV Connect Team also began monthly visits with American Airlines employees at Reagan National Airport.

The DMV Connect teams have also begun offering REAL ID credentials at Department of Corrections (DOC) facilities. DMV Connect teams regularly visit DOC facilities throughout Virginia, providing mostly ID card services. As of October 1, DMV Connect began offering REAL ID-compliant ID cards at DOC facilities throughout Virginia. Soon-to-be-released offenders are able to get a REAL ID and have the identification for federal purposes. Having the ability to get a REAL ID decreases any additional barrier to a second chance once an inmate is released. On December 4<sup>th</sup>, the first visit to the Fluvanna Correctional Center for Women since implementing the new policy, DMV processed 11 REAL ID transactions.

As noted in the previous quarterly reports, from March through June, DMV piloted a series of DMV Connect visits in which customers were scheduled in advance for appointments. Given the success of the pilot, DMV now offers “pop-up appointments” two days a month in various locations throughout the Commonwealth and is exploring expansion of this approach in the coming months. In November, DMV provided two days of appointments in the Richmond area; 158 transactions were processed, including 136 REAL IDs. In December in Charlottesville, the Connect team offered scheduled appointments on two days and conducted 170 transactions, 138 of which were for REAL ID credentials.

A detailed schedule of all upcoming mobile operations visits is posted on DMV’s website at: [DMV mobile calendar](#). New visits are added to the calendar on an ongoing basis. Upcoming regularly scheduled visits include local government centers such as Western Henrico Government Center, Falls Church City Hall, and Loudoun County Satellite Office; DMV Select offices such as Stafford Select and Luray Select; and retirement communities such as Westminster Canterbury of the Blue Ridge and The Imperial Plaza in Richmond.

### C. Public Relations – Communications about REAL ID

DMV continues to make use of a range of communication channels to educate the public about REAL ID and to encourage those who may need a REAL ID to visit an office fully prepared with required documentation to ensure a successful visit. As noted earlier in the report, Virginians are increasingly opting to get a REAL ID credential instead of a standard credential. Additionally, customers are coming in before their renewal month. These are signs that DMV’s REAL ID message is reaching Virginians. Communication channels that continue to be used include:

- News releases and other information provided for use in print, digital, and TV news stories;
- Signage at CSCs and airports;

- Brochures and flyers at CSCs, DMV Selects, and airports;
- DMV webpage dedicated to REAL ID information, including informational video, and “pop up” message on homepage (*REAL ID webpage was recently refreshed*);
- Information included in driver’s license, ID card, and vehicle renewal notices;
- Social media messaging through Facebook, Instagram, and Twitter;
- Information sharing through stakeholder groups, including legislators;
- Speakers and informational tables at club meetings, legislator town halls, community events, conferences, and airports; and
- News conferences with Department of Homeland Security, Transportation Security Administration (TSA), and DMV’s other partners.

October 1<sup>st</sup> was the one-year anniversary of DMV’s REAL ID compliance and also began the one-year countdown until federal enforcement of REAL ID begins at airports. To mark this anniversary, DMV Commissioner Holcomb, along with representatives from the TSA, airline and travel industry representatives, and DMV officials from Maryland and the District of Columbia, held a press conference at Ronald Reagan Washington National Airport to discuss the one-year enforcement timeline for REAL ID. This event was directed toward a national audience. CNN, NBC, ABC and other national news outlets aired segments after the news conference. DMV followed up that event with a press release directed toward Virginia-based media. The DMV press release provided an overview of REAL ID requirements, stressed the importance of coming to DMV prepared, and encouraged customers to visit DMV in 2019 to avoid the expected crowds at DMV offices as the enforcement date approaches ([DMV press release](#)). The number and percentage of REAL ID credentials issued daily increased immediately following the October 1<sup>st</sup> press coverage. Additionally, Commissioner Holcomb was interviewed by CBS News in late December, with a TV news story expected to air in early January.

DMV’s Communications Office has been successful with its outreach to local airports and airlines. As previously reported, Richmond International Airport continues to display REAL ID advertisements on its messaging boards. TSA agents at Richmond International, Norfolk, and Newport News-Williamsburg airports are handing out Virginia’s REAL ID brochures to travelers. In addition, American Airlines is currently distributing REAL ID brochures at its counters at Dulles, Lynchburg, Shenandoah Valley, Richmond, Norfolk, and Newport News-Williamsburg airports.

As an additional outreach, Commissioner Holcomb emailed all Virginia colleges and universities to notify them of the upcoming REAL ID deadline and the potential impact of students not having a REAL ID in the fall semester. Specifically, sports teams that travel and out-of-state students who fly home for the holidays could be impacted if they do not have a REAL ID by October 2020. DMV has offered the Mobile Operations program to those schools that believe their students could benefit from having a DMV Connect team visit the campus. For example,

the University of Virginia Athletic Department has scheduled Connect Team visits on campus in January and February to allow coaches, players, and staff to get their REAL IDs, since their teams travel frequently.

DMV's REAL ID communications plan included a media campaign for 2019 titled "Get on Board with REAL ID." The objective of the strategy was to educate customers about REAL ID and to encourage them to visit DMV now to upgrade their credentials, rather than waiting until summer or fall of 2020, when offices are expected to be exceptionally busy. One exciting facet of the strategy is social media marketing. In September, DMV began a two-month paid social media marketing campaign on Facebook and Instagram. The campaign posts relevant REAL ID advertisements in Virginians' media feeds on Facebook and Instagram – specifically, those users who have visited Virginia airports and military installations, as well as users of travel-related websites. This campaign was DMV's first entry into paid social media advertising and was a considerable success. By the end of the two months, a total of 899,323 unique individuals were presented the targeted REAL ID advertisements via 4,021,748 impressions (which is the number of times the advertisement was placed in the person's media feed). This led to 24,144 visits to the REAL ID page on dmvNOW.com. Impressions were recorded in most major areas of the Commonwealth. DMV's Facebook page exposure nearly doubled. In addition, there have been 2,969 "reacts," "comments," and/or "shares" to the advertisements, which exponentially expands exposure to the REAL ID advertisements. DMV staff determined that this method of marketing the REAL ID message was successful and cost-effective and, as a result, resumed the campaign as of December 20, 2019.

In addition to the paid social media marketing campaign, DMV also continued to promote REAL ID through its multiple social media outlets. DMV presents a REAL ID pop-up message on its home page, which includes a link to DMV's REAL ID webpage for detailed information on how to obtain a REAL ID. To date, the REAL ID-themed Suzy Q&A video on DMV's website has been viewed more than 128,000 times on YouTube. Another video was recently added to show customers how to use the on-line document guide for REAL ID. DMV's REAL ID homepage has had more than 2.6 million unique page views from October 1, 2018, through December 31, 2019. Additionally, Virginia.gov displayed REAL ID information on its homepage in November.

DMV also has continued holding REAL ID informational events at airports across the state, an effort that began in the spring. DMV staff sets up tables in highly trafficked areas of airports to answer REAL ID questions from the traveling public and encourage Virginians to visit DMV to get their REAL ID credentials. After each event, DMV routinely experiences a spike in REAL ID customers in the local area where the event was held. In late December, DMV hosted a REAL ID information table at the Roanoke-Blacksburg Regional Airport. This event was attended by local press outlets. DMV also hosted informational tables at Richmond and Dulles International airports

in December. Additionally, DMV joined TSA for several joint press conferences this quarter, including:

- October 28 at Dulles International Airport (broadcast on Facebook Live and covered by Telemundo DC, NBC 4 DC, and The Loudoun Times);
- November 14 at Reagan National Airport (broadcast on Facebook Live and covered by WTOP, Telemundo DC, CBS Baltimore, and Capital New Service), and
- December 3 at Richmond International Airport (broadcasts on Facebook Live, and covered by NBC 12, WTVR, WRIC, WRVA, and NPR).

These events were geared toward local media markets and were used to remind Virginians that, after October 2020, they will not be able to board a domestic flight unless they have a REAL ID-compliant credential. An additional event has been scheduled for January 17<sup>th</sup> at the Newport News/Williamsburg International Airport.

DMV staff also attended a variety of community meetings and events this past quarter to present information about REAL ID. For example, DMV employees presented information about REAL ID at the Virginia Military Advisory Council (VMAC) meeting at Fort Lee, the Governor's Transportation Conference in Arlington, and at several Census outreach events throughout the Commonwealth, among many other events. As result of the presentation at VMAC, new DMV Connect visits were added at the Norfolk Naval Yard and to Fort Belvoir. At another event on December 9, 2019, Commissioner Holcomb was joined by U.S. Congressman Gerry Connolly for a REAL ID press conference at the Dumfries DMV Select, host to a DMV Connect visit. During the event, Congressman Connolly successfully applied for his REAL ID and then discussed his experience during the press conference. The event, which DMV broadcast via Facebook Live, resulted in news coverage from WTOP, Inside Nova, What's Up Prince William, Prince William Times, Patch, and Potomac Local. During 2020, DMV plans to coordinate additional press events with key members of the Administration and federally elected officials, during which the Virginia dignitaries will obtain their REAL ID compliant driver's licenses at DMV.



*Pictured left to right: Dumfries Town Manager Keith Rogers; DMV Commissioner Rick Holcomb; Congressman Gerald "Gerry" Connolly; Prince William County Supervisor-elect Andrea Bailey; and Dumfries Mayor Derrick Wood*

#### D. Processes

Throughout the roll-out of REAL ID, DMV has identified and implemented numerous process improvement actions that ultimately enable DMV to serve more customers in its field offices. For example, in January 2019, DMV implemented a “start anywhere” process for the driver’s license renewal transaction. This process allows customers to begin their transactions online, pre-filling the driver’s license application and building their list of required documents to bring to the CSC to renew and obtain a REAL ID-compliant driver’s license. On June 19, 2019, DMV expanded this option to enable customers to begin their driver’s license replacement transactions online. As of January 1, 2020, 78,063 DMV customers began their driver’s license renewals from home (or anywhere of their choosing outside of a DMV office), and 61,175 customers used this option to begin their driver’s license replacement transactions online. Of the customers who completed their “start anywhere” transactions online, 86% subsequently obtained a REAL ID-compliant license by completing the process in a CSC. Use of the “start anywhere” process helped ensure customers came to the CSC well prepared for a successful transaction and reduced the time in the office required to complete the transaction.

CSC staff’s tasks include both front counter transactions and back office document processing, including daily work related to information collected for the Department of Elections through the Motor Voter process. In order to increase staff time on the front counter at urban CSCs, these busy CSCs transmit their document preparation work to CSCs in more rural areas. Three processing hubs have been established at the Clintwood, Gate City, and, most recently, Lebanon CSCs, with a total of 27 wage staff assigned to assist with remote processing.

To date, 69 CSCs participate in the process. While just over half of the participating offices are in urban areas that transmit their work to the hubs in southwest Virginia for processing, there are

also 33 CSCs that scan and review their own work within the electronic system. DMV has found that even for rural CSCs not transmitting the work to another location, the new automated process is considerably faster than the traditional method for completing the document preparation work. This allows employees in these CSCs to complete the back office process sooner, so they may return to serving customers. The automated process will continue to be introduced to the remaining CSCs, with a goal of having all 75 CSCs participating in the process by the end of January 2020.

Another component added to remote processing is CSC management verification of scanned documents. DMV requires that 20 percent of all scanned REAL ID-related documents be reviewed to ensure accuracy. DMV is now able to provide this function remotely for all CSCs via staff at the Norton CSC. Additionally, this CSC reviews a portion of the scanned Virginia Department of Health (VDH) vital record applications and related documents to ensure the accuracy of these transactions. By performing these duties at another location, CSC management is freed to focus on the other management functions relating to their offices.

As of November 20, 2019, DMV modified its vehicle renewal notice to place an alert to customers within a yellow box prominently placed on the notice. The alert strongly encourages customers to complete their registration renewal via service outlets outside of a CSC, due to heavy REAL ID customer volume in the CSCs. DMV will continue to explore additional ways that the agency can inform customers about other DMV transactions that can be completed online or through other service options rather than visiting a CSC. The more work that can be moved to DMV's other service outlets, the more capacity will be available in CSCs to serve REAL ID customers.

As another process improvement initiative, DMV trained 14 agents from its Law Enforcement Division to administer driver licensing skills tests. These agents volunteered to administer tests on Saturdays, when CSCs tend to have a higher number of customers needing skills testing. Each driver skills test takes up to 30 minutes to complete. Thus far, 11 agents have worked 203 hours on Saturdays to administer road tests. By having these agents administer the road tests, the customer service representatives in those CSCs were able to spend this time on the front counter serving REAL ID and other customers. DMV plans to continue this initiative through next year.

One process improvement that has recently gained added momentum is DMV's remote knowledge testing process. To obtain a driver's license, a teen must take a driver's knowledge test in addition to a road skills test. Traditionally, the road skills test is taken at the teen's local high school or at a third party tester. In 2014, DMV began working with high schools to establish testing sites in the schools so that the knowledge test could be taken in the high school as well. In 2018, schools participating in the remote testing program administered almost 1,700 tests. In 2019, 41 new high schools were added to the program. Reaching a high point this year, high schools participating in the program administered 5,653 tests, tripling what was conducted the previous year. Customers now only have to come to DMV to apply for their learner's permit

and pay their fee, saving both customer time and DMV staff resources. As of January 1, 2020, there are 117 schools in 40 localities that participate in this program.

Through another process improvement initiative, on December 20<sup>th</sup>, DMV added Google Pay and Apple Pay on over 850 DMV credit card terminals in all CSCs statewide. These payment options allow customers to tap their cell phones to the credit card terminals for quicker payment of their DMV transactions.

Looking forward, as of January 1, 2020, DMV will no longer accept titling work from automobile dealerships in the CSCs. Instead, dealer work may be processed only by designated auto auctions and DMV Selects, or via the online dealer system. Additionally, the threshold requirement for participation in the Online Dealer Program will decrease from 200 to 100 transactions, thereby increasing the number of dealers participating in the electronic program. These two changes in how dealer work is processed will allow for substantial additional CSC staff time to be devoted to the increasing volume of REAL ID customers expected in 2020.

On January 15, 2020, DMV will begin using a revised driver's license and ID card application that will clarify for customers the implications of choosing to get a standard credential versus a REAL ID-compliant credential. On DMV's current credential application, customers are asked if they would like to obtain a REAL ID-compliant credential, and they indicate their decision by checking a simple Yes or No box. The revised application will have customers answer either *"Yes – I would like to use my license as ID to board a domestic flight or enter a secure federal facility or military base on or after October 1, 2020"* or *"No – I acknowledge my license will display "Federal Limits Apply" and I will need another form of ID to board a domestic flight or enter a secure federal facility or military base on or after October 1, 2020."* This more detailed explanation will help customers have a better understanding of what getting or not getting a REAL ID will mean to them.

In February, a simplified customer PIN reset process will be rolled out. Today, when a customer is locked out of his or her online account, he or she must call DMV's call center or visit a CSC to get a new PIN. The new process will allow for customer self-service, reducing call volume and visits to CSCs for business that could be handled online.

Currently, customers who have certain International Fuels Tax Agreement (IFTA) or International Road Plan (IRP) transactions have to come to a CSC twice to complete their transactions. In early spring, a new system for these customers will be in place that should reduce return trips for almost 6,000 customers and eliminate more than 11,000 transactions in CSCs. Each transaction is approximately 14 minutes long, so this system is expected to free up 2,670 hours that will then be available to serve customers who are required to visit a CSC to complete their transaction, such as obtaining a REAL ID.



E. Staffing

Effective July 1, 2018, the General Assembly authorized for DMV an additional 42 positions to assist with REAL ID implementation. In addition, at the end of 2018, the Administration authorized DMV to use 71 positions that had been allocated in 2008 for REAL ID but then set aside since REAL ID was not implemented at that time. This past year, DMV has diligently worked to fill these additional positions. In previous quarterly reports, DMV noted several concerns with staffing, including DMV’s difficulty with hiring and retaining staff. Table 3 provides information on new hires and separations for the last several years, reflecting the high staff turnover DMV has experienced in recent years. This problem with turnover has made it difficult for DMV to maintain staff in its CSCs who are fully trained and proficient in all DMV transactions. Turnover is particularly a problem given the months-long training that is required for field staff to be able to efficiently serve customers.

Table 3: Summary of Changes in Classified and Wage CSC Staff

<b>Summary of Changes in Classified Field Staff</b>					
<b>STATEWIDE</b>	<b>CY 2015</b>	<b>CY 2016</b>	<b>CY 2017</b>	<b>CY 2018</b>	<b>CY 2019</b>
Classified Staff as of Jan. 1	805	816	824	846	872
New Hires	74	108	145	157	212
Separations	63	100	123	131	137
Separations of Staff with 3 or More Years of Services	46	67	71	70	64

<b>Summary of Changes in Wage Field Staff</b>					
<b>STATEWIDE</b>	<b>CY 2015</b>	<b>CY 2016</b>	<b>CY 2017</b>	<b>CY 2018</b>	<b>CY 2019</b>
Wage Staff as of Jan. 1	227	267	247	254	252
New Hires	107	90	116	117	183
Separations	67	110	109	119	126

Based on the data for 2019, it appears that DMV’s efforts to attract and retain staff, which included providing a small raise to field staff in the fall of 2018, have been modestly helpful in retaining staff. This year to date, the agency has been able to retain slightly more employees who have three or more years of service. This is particularly important, as these employees are fully trained on all DMV transactions.

DMV ended the quarter with 947 classified field staff (including 36 mobile operations staff), which is slightly more than the close of the last quarter. In comparison, DMV ended 2018 with 872 full-time CSC staff and 30 mobile operations staff. While DMV has hired more staff, the

staff turnover experienced in the CSCs continues to result in substantial time spent training staff as well as having less productive staff due to inexperience.

To supplement recruitment from the general population, DMV has continued to recruit recent retirees to return to work part-time. Seasoned employees are being offered the opportunity to earn extra income to supplement retirement. As of December 31, 2019, 17 recent retirees have returned to work part time. This approach eliminates the time and effort associated with training employees who have never worked in a DMV office.

Despite progress in hiring, DMV remains concerned with staffing as the agency still must rely on overtime work by field staff in order to meet customer demand. DMV will continue its aggressive hiring effort to fill all positions that become vacant due to turnover. However, with wait times increasing in offices that issue high volumes of REAL IDs, particularly in Northern Virginia, it is clear that current staffing levels will not be sufficient to serve the large increase in customers anticipated to visit DMV offices in 2020.

#### **IV. Next Steps and Conclusions**

In the coming months, DMV will continue its progress in issuing REAL ID-compliant credentials to those who apply for and successfully meet the requirements of the REAL ID Act. At the same time, it is noteworthy that DHS has begun considering possible changes to the federal requirements associated with REAL ID. DMV intends to closely monitor and participate in deliberations at the federal level while also taking whatever steps possible to ensure Virginians who need a REAL ID are offered the ability to obtain this important credential.

##### **A. Recent Interactions with U.S. Department of Homeland Security**

Periodically, the American Association of Motor Vehicle Administrators (AAMVA), the trade association for North American motor vehicle agencies, provides opportunities at its conferences for DHS and DMV officials to discuss issues relevant to REAL ID. Based on positive discussions held during the AAMVA August conference meeting, DHS and DMV officials continued the REAL ID dialogue into the fall. In addition to written communications, a meeting was held at DHS Headquarters on November 5, 2019, attended by the current Acting Secretary of Homeland Security, Chad Wolf; current TSA Administrator, David Pekoske; members of AAMVA's Board of Directors, including motor vehicle administrators from Virginia, Maryland, Indiana, and Colorado; the AAMVA president and staff; and additional DHS staff.

At the meeting, state and federal officials discussed ways that states can improve their capacity to meet customer demand for REAL IDs, as well as possible steps that DHS could take to address current federal impediments to secure issuance of REAL IDs by states. State motor

vehicle administrators, including the Virginia DMV Commissioner, presented several recommendations for modernizing the requirements surrounding the REAL ID process in a way that would both help increase the number of Americans with REAL ID-compliant credentials and, at the same time, ensure the security of the credentials.

Subsequent to this meeting, DHS issued a Request for Information (RFI) asking for written “input on technologies that could assist states and their residents in the digital submission, receipt, and authentication of documents and information applicants must provide when applying for a REAL ID compliant driver’s license or identification card.” The RFI further stated, “DHS is interested in all substantive business and technical proposals that could streamline REAL ID application requirements in a manner that continues to ensure the secure and reliable transmission and receipt of applicant information.” (*DHS - Automated Solutions for the Submission of REAL ID Source Documents*, 84 Fed. Reg. 60104 (November 7, 2019).) DMV welcomes this review by DHS, as the department has conveyed numerous times to DHS over the years the need for flexible, comparable security measures that would relieve undue burdens on Virginians. As AAMVA aptly noted in its response to the RFI, “When the Act was considered and passed in 2005, many of the program requirements promulgated as a result of the Act did not take into consideration the many ways the same security intentions behind the Act could be preserved and accomplished in a less administratively burdensome way.”

By the RFI deadline of December 9, 2019, DHS received 68 comments, 24 of which were from U.S. jurisdictions. Respondents submitted a broad range of suggestions, including:

- modifying the interpretation of terms such as “document” and “documentary evidence” to include online verification of electronic records;
- allowing for exceptions to proof document requirements for citizens over a certain age who have resided in their state for an extended time;
- allowing for reciprocity across states regarding a customer’s REAL ID status;
- allowing for document verification through electronic submission of proof documents;
- designating additional federally issued documents as REAL ID compliant; and
- increasing federal efforts to educate the public about REAL ID.

As part of the RFI process, Virginia DMV submitted a response which identified ten recommendations for consideration. An overarching theme of the recommendations was that states should be allowed to grant REAL ID status to customers who have already met the federal burden of proof to be issued a federally-acceptable proof of identification document. The federal government has deemed certain federal credentials, including a U.S. passport, U.S. Department of Defense ID, U.S. government employee ID, and DHS Trusted Traveler Card, among other identification, as comparable to the requirements of the REAL ID Act and, therefore, eligible to

be used to board domestic aircraft and to access federal facilities. Requiring the holder of these federal credentials to also complete the full vetting process for a state-issued REAL ID is redundant and imposes an excessive and unnecessary burden on both the public and state issuing agencies.

DMV recommended that electronic systems be used to allow for online verification of a customer's federal credential. A DMV customer would log into his or her secure, online DMV account and enter the data required based on the type of federal document being verified. That data would then be combined with data from the customer's existing DMV record and sent securely to an electronic verification system. If the appropriate data fields were confirmed, the customer would be authorized to obtain a REAL ID-compliant driver's license or ID card online, eliminating the need for an in-person visit. As an example, if current U.S. passport holders in Virginia were allowed to electronically verify their passport status and obtain a REAL ID online and half of them chose to do so, an estimated additional 1.9 million Virginians would potentially obtain a REAL ID credential. This would free up approximately 538,000 hours of staff time in CSCs to serve those customers who would be required to visit DMV in person. This change would allow DMV to process substantially more REAL IDs for customers through the combined in-person and online service channels within the same time period and to do so in a more cost-effective manner. Effecting this change would require implementing enhancements to existing verification systems and creating additional verification systems, which, in some cases, would require several months to implement.

In addition, as part of the current in-person REAL ID application process, Virginia recommended use of existing social security and birth event electronic verification systems in lieu of requiring presentation of a physical Social Security card and birth certificate. Appendix C contains Virginia's full response to the RFI.

DHS is currently analyzing all responses to the RFI. Initial indications suggest that DHS will give consideration to allowing alternative processes that fully meet the intent of the REAL ID Act but in a more efficient manner, but doing so may require modifications to existing federal law. A subsequent DHS meeting with AAMVA Board members and staff has been scheduled for February 2020 to discuss next steps.

## B. Resource Needs

Since currently there is no guarantee that DHS will implement any recommended enhancements to the REAL ID process or that any changes will be implemented in time to ameliorate extremely high customer volumes in the coming months, DMV must continue to follow its current path toward meeting the REAL ID credential needs of its customers. At this point, Virginians now have less than one year to successfully secure a REAL ID-compliant credential prior to full federal enforcement on October 1, 2020. (Note: Customers will not need to get a REAL ID-

compliant credential until they plan to fly domestically or enter secure federal facilities, even after the federal enforcement date.) As has been experienced to date, DMV anticipates month-to-month REAL ID customer volume increases through October 2020 and beyond, with customer volumes and corresponding wait times peaking during the summer and fall of 2020. Over the next few months, DMV will continue its communications efforts to encourage customers to visit DMV as soon as possible to obtain their REAL ID credentials. The agency will maintain flexibility with its messaging, as it may become necessary to moderate communications by the spring or summer to encourage customers to seek alternative REAL ID-compliant credentials (as cited on TSA's webpage) due to physical capacity issues at DMV offices.

At the same time, during 2020, DMV will continue to institute changes that help increase capacity and serve customers more efficiently. In addition to the initiatives identified previously in this report, such as restricting the locations at which dealer work may be processed, increasing use of the Online Dealer Program, and completing several office renovations and relocations, DMV plans to further explore and pursue actions such as:

- increasing the use of appointment scheduling through DMV Connect teams;
- adding additional scanning equipment in CSCs to assist with scanning and storing REAL ID-related documents;
- further promoting online processing of customer transactions to reduce the number of visits to CSCs for work that could be accomplished outside of a CSC;
- temporarily "loaning" staff from less busy offices to the busiest offices during peak times;
- increasing pay for customer service representatives to encourage employee retention (thereby reducing turnover-related costs); and
- expanding service hours.

However, given increasing wait times in the Northern Virginia area and elsewhere, DMV has determined that the actions taken and planned to increase service capacity for REAL IDs in the CSCs is not going to be adequate to handle the sheer volume of anticipated customers in 2020. Since October 1, 2018, DMV has issued REAL ID credentials to a little more than one-third of the customers that DMV estimates will want a REAL ID. That means that the remaining two-thirds of expected REAL ID customers will need to be served during 2020 and likely well into 2021. Without additional staff resources, DMV cannot meet expected demand without severe degradation of customer service and customer wait times.

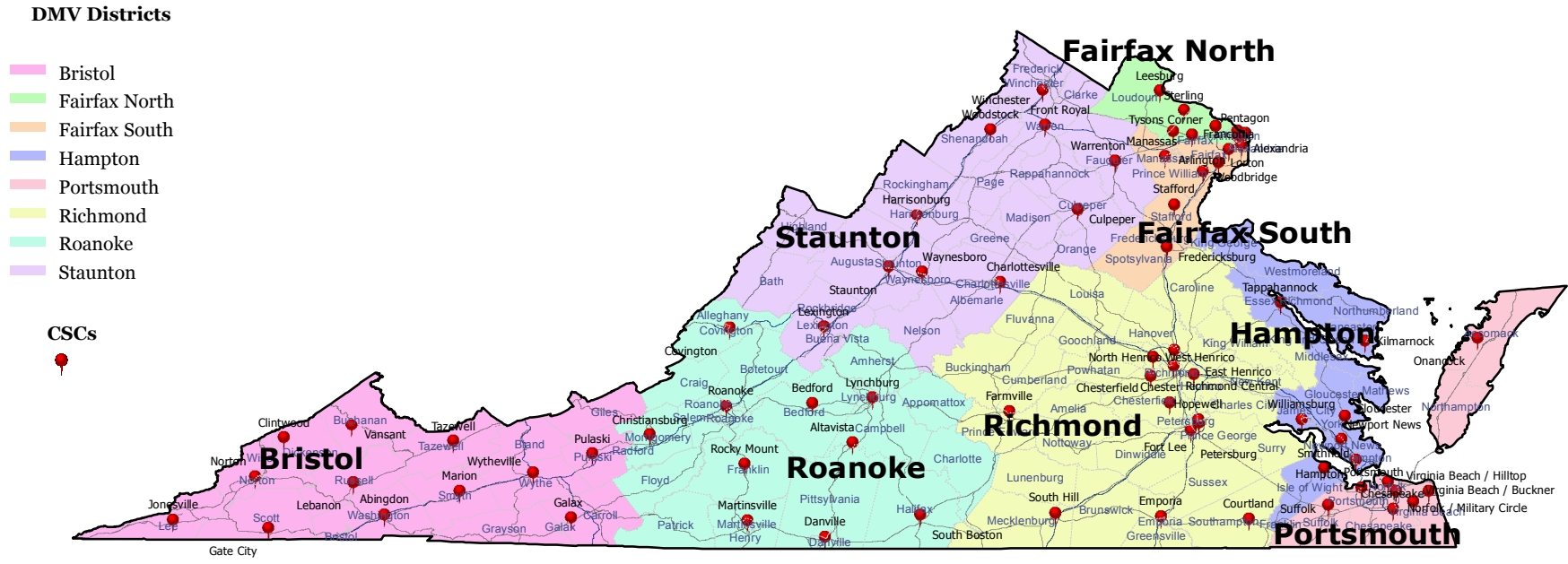
To address this discrepancy in capacity, the Governor included in his recently submitted 2020-2022 Budget (House Bill 30/Senate Bill 30, Introduced) and 2018-2020 Budget (House Bill 29/Senate Bill 29, Introduced) the addition of 100 classified positions for DMV to address REAL ID demand for FY 2020 through FY 2021. For FY 2022, the additional positions were reduced

to 40. These positions will enable DMV to fully staff existing and planned service windows at its offices in the urban crescent of the state, which is where REAL ID demand is greatest. Today, while an office may have 14 windows, there may only be enough positions allocated to the office to staff all the windows 70% of the time. In addition, DMV will be able to expand use of DMV Connect teams to provide service directly in communities where demand for REAL IDs is high. DMV anticipates the \$10 REAL ID surcharge collected on each REAL ID transaction will be sufficient to cover the cost of the additional staff. As customer volumes begin to decrease sometime in 2021, DMV's positions can be reduced through normal attrition.

DMV will continue to monitor customer trends, service capacity, and DHS actions regarding REAL ID and will keep the Administration and General Assembly abreast of any deviations from expected conditions or changes in requirements.

# Appendix A

## DMV Districts and Locations of Customer Service Centers





**Appendix B: REAL ID Credentials Issued by  
Customer Service Center and the Mobile Operations Program  
October 1, 2018– December 31, 2019**

<b>Customer Service Center (CSC)</b>	<b>Number of REAL IDs</b>	<b>Percentage of Credentials that are REAL ID</b>	<b>Rank by Number of REAL IDs</b>	<b>Rank by Percentage of REAL IDs</b>
Tysons Corner CSC	43,374	54.66%	1	10
Fair Oaks CSC	40,744	57.64%	2	7
Fairfax/Westfields CSC	35,539	62.44%	3	3
Leesburg CSC	34,005	61.24%	4	4
Sterling CSC	32,845	55.78%	5	9
Woodbridge CSC	31,963	49.09%	6	17
Arlington CSC	30,548	48.87%	7	19
Franconia CSC	29,817	50.62%	8	15
Prince William/Manassas CSC	27,236	49.04%	9	18
West Henrico CSC	27,229	49.75%	10	16
Alexandria CSC	27,174	54.25%	11	11
Lorton CSC	26,867	53.45%	12	12
Arlington DMV Metro VA Square	25,403	68.70%	13	2
Chesterfield CSC	25,051	39.44%	14	35
Mobile Operations	24,284	58.02%	15	5
North Henrico CSC	23,818	40.45%	16	32
Fredericksburg/Spotsylvania CSC	23,715	41.32%	17	28
Charlottesville CSC	22,174	47.18%	18	20
Roanoke CSC	22,033	36.16%	19	38
VA Beach/Buckner CSC	21,591	39.73%	20	34
Chesapeake CSC	19,813	42.90%	21	23
VA Beach/Hilltop CSC	18,944	42.68%	22	25
Warrenton CSC	18,251	56.95%	23	8
Stafford CSC	17,248	51.43%	24	14
Williamsburg CSC	15,947	52.37%	25	13
Newport News CSC	15,721	35.68%	26	39
Richmond Central HQ	14,759	28.62%	27	52
Harrisonburg CSC	13,139	37.38%	28	36
Lynchburg CSC	13,131	32.63%	29	42
Chester CSC	13,074	31.36%	30	45
Winchester CSC	12,385	43.55%	31	22
Hampton CSC	12,380	25.22%	32	61
Christiansburg CSC	12,023	41.40%	33	27
Culpeper CSC	11,920	41.49%	34	26

<b>Customer Service Center (CSC)</b>	<b>Number of REAL IDs</b>	<b>Percentage of Credentials that are REAL ID</b>	<b>Rank by Number of REAL IDs</b>	<b>Rank by Percentage of REAL IDs</b>
Portsmouth CSC	11,656	29.34%	35	49
Norfolk/Military Circle CSC	10,390	25.54%	36	58
Norfolk/Widgeon CSC	9,780	24.52%	37	62
Gloucester CSC	8,035	40.74%	38	30
East Henrico CSC	8,034	22.81%	39	64
Front Royal CSC	8,003	40.60%	40	31
Suffolk CSC	7,502	32.37%	41	43
Bedford CSC	6,481	42.71%	42	24
Waynesboro CSC	6,393	36.64%	43	37
Farmville CSC	6,179	29.58%	44	48
Hopewell CSC	5,863	22.67%	45	65
Smithfield CSC	5,811	40.90%	46	29
Staunton CSC	5,749	31.68%	47	44
Rocky Mount CSC	5,660	35.20%	48	40
Tappahannock CSC	5,625	30.65%	49	46
Abingdon CSC	5,397	30.40%	50	47
Pentagon	4,873	79.48%	51	1
Woodstock CSC	4,748	34.19%	52	41
Petersburg CSC	4,259	17.52%	53	72
Kilmarnock CSC	4,134	44.03%	54	21
Martinsville CSC	4,087	20.79%	55	67
Danville CSC	4,075	18.08%	56	71
Galax CSC	3,628	27.85%	57	54
Lexington CSC	3,456	40.04%	58	33
Pulaski CSC	3,438	25.31%	59	60
Onancock CSC	3,299	26.66%	60	55
Wytheville CSC	2,868	27.95%	61	53
Courtland CSC	2,722	29.07%	62	51
Fort Lee CSC	2,689	57.84%	63	6
Altavista CSC	2,551	25.32%	64	59
South Boston CSC	2,389	19.61%	65	68
South Hill CSC	2,303	22.43%	66	66
Covington CSC	1,928	25.77%	67	57
Tazewell CSC	1,853	18.56%	68	70
Marion CSC	1,767	25.97%	69	56
Lebanon CSC	1,634	22.97%	70	63
Gate City CSC	1,591	29.29%	71	50
Norton CSC	1,580	16.26%	72	73
Emporia CSC	1,097	15.06%	73	75

<b>Customer Service Center (CSC)</b>	<b>Number of REAL IDs</b>	<b>Percentage of Credentials that are REAL ID</b>	<b>Rank by Number of REAL IDs</b>	<b>Rank by Percentage of REAL IDs</b>
Jonesville CSC	760	16.19%	74	74
Vansant CSC	715	14.95%	75	76
Clintwood CSC	688	19.13%	76	69

## **Appendix C: Virginia DMV Response to November 7, 2019 Department of Homeland Security Request for Information**

### **Virginia Department of Motor Vehicles**

Response to the US Department of Homeland Security (DHS) November 7, 2019 Request for Information on Automated Solutions for the Submission of REAL ID Source Documents [Docket No. DHS-2019-0056]

#### Overview of Virginia's REAL ID program

Virginia began issuing REAL ID compliant driver's licenses and ID cards on October 1, 2018. Residents are given the option of obtaining a REAL ID or a legacy credential when applying for a first-time Virginia credential and when renewing or obtaining a replacement credential. Early estimates indicated 40% of Virginians, or 2.6 million residents will obtain a REAL ID credential. As of November 21, 2019, 860,399 Virginians have been issued a REAL ID compliant credential, which is approximately one-third of the customers Virginia DMV estimated would seek a REAL ID compliant credential and 13% of Virginia's total credentialed population. Our projection is that an additional estimated 1.8 million applicants will need to be served before October 1, 2020.

#### Virginia's Response

On November 7, 2019, DHS released a Request for Information (RFI) seeking "input on technologies that could assist states and their residents in the digital submission, receipt, and authentication of documents and information applicants must provide when applying for a REAL ID compliant driver's license or identification card."

Virginia's proposals are noted below.

#### **I. Grant REAL ID status to those who have met the federal burden of proof to be issued a federally-acceptable proof of identification document**

##### Justification

While this is not a recommendation to streamline the submission of all required proof documents, the recommendation is consistent with § 37.51 of the Final Rule (Compliance—general). This rule outlines two paths to full compliance as follows:

- States must meet the standards of subparts A through D or;
- Have a REAL ID program that DHS has determined to be *comparable* [emphasis added] to the standards of subparts A through D.

We believe this regulation clearly authorizes DHS to approve the vetting process used by the federal government when issuing a US passport, DHS Trusted Traveler Card, Transportation Worker Identification Credential (TWIC), US Department of Defense ID or a US government employee ID card as one that "DHS has determined to be comparable with the standards of subparts A through D". Holders of these documents that can be used to access federal facilities or to board domestic aircraft have already successfully completed a federal vetting process. Therefore, requiring them to also complete the full vetting process for a state-issued REAL ID driver's license or ID card (DL/ID) is redundant and imposes an excessive and unnecessary burden on both the public and state issuing agencies.

The Department of Homeland Security should permit states to grant REAL ID status to those customers who the DL/ID issuing agency has verified have been issued one of the documents noted above as being acceptable for federal proof of identification.

This proposal will offer the most benefit towards the goal of increasing the percentage of the public possessing a REAL ID compliant DL/ID.

#### Virginia's Proposed Process to verify federally accepted proof documents

In each case described below, existing DL/ID holders will electronically access their secure Virginia DMV account. This account is based on the controls identified in the National Institute of Standards and Technology's (NIST) Special Publication 800-53 revision 4. Virginia has applied nearly all the specified controls to sensitive platforms such as this. For the few controls not selected, other mitigation controls that are unique to our environment have been implemented. Once logged in, the individual will enter the data required based on the type of document being verified and Virginia DMV will utilize the name and date of birth already on the customer record along with the added specialized information to prepare and send the secure electronic verification inquiry. In all cases, both the information sent and the verification response will be maintained on the customer record.

- If all data fields are confirmed via the appropriate electronic interface, a REAL ID indicator will be added to the record. This will allow the individual to secure a renewal or replacement of their DL/ID that will include the REAL ID compliant indicator online, without coming into a Virginia DMV customer service center.
  - If all fields are not confirmed via the appropriate electronic interface, the individual will be directed to visit a Virginia DMV customer service center to present the required documentation through the standard REAL ID process.
- a. **Allow existing DL/ID holders to perform a secure online verification of their US passport via the US Passport Verification Services (USPVS) to obtain a REAL ID compliant card**

#### Virginia's Proposed Process

Because Virginia already uses USPVS to verify US passports presented as part of a REAL ID DL/ID application, this process will be an enhancement to the existing process rather than a full system implementation.

Current DL/ID holders will log into their secure Virginia DMV online account to initiate a verification of their US passport. The system will prompt them to enter their US passport number and US passport expiration date and an inquiry will be electronically submitted via USPVS.

**[This proposed process requires the American Association of Motor Vehicle Administrators (AAMVA) and the US Department of State (DOS) to add fields for passport expiration date and name to the passport verification transaction.]**

#### Estimated Increase in REAL ID Adoption Rate / Additional Staff Time Realized / Cost Savings

The estimated number of Virginians who hold a passport is 3,800,000.

- If **half** of these individuals (minus those who have already gotten a REAL ID with a US passport, approximately 400,000) utilize online passport verification, it would free up approximately 538,000 hours of staff time to allow for other customers to be served. This assumes each REAL ID takes 17 minutes per transaction in the customer service center. If half of Virginians with a passport chose to go online to get a REAL ID, an estimated additional 1,900,000 Virginians would potentially obtain a REAL ID credential. This change would allow us to process substantially more REAL IDs for customers through our combined in-person and online service channels within the same time period than we would be able to accomplish under the current requirements, and to do so in a more cost-effective manner.
- If **a quarter** of these individuals (minus those who have already gotten a REAL ID with a US passport, approximately 400,000) utilize online passport verification, it would free up

approximately 269,000 hours of staff time to allow for other customers to be served. This assumes each REAL ID takes 17 minutes per transaction in the customer service center. If a quarter of Virginians with a passport chose to go online to get a REAL ID, an estimated additional 950,000 Virginians would potentially obtain a REAL ID credential. This change would allow us to process substantially more REAL IDs for customers through our combined in-person and online service channels within the same time period than we would be able to accomplish under the current requirements, and to do so in a more cost-effective manner.

IT Estimate / Conditions / Assumptions

Once fields for name and US passport expiration date have been added by AAMVA and DOS to the verification transaction, Virginia DMV would require 2 ½ months to program and test this transaction.

It is recommended that AAMVA and DOS include 24/7 system availability or the most system availability possible with the understanding it may be necessary to have established maintenance windows.

Additionally, Virginia DMV recommends that a 3-try enforcement rule be enacted for added security.

Cost to Implement

\$52,560

**Note:** A similar concept was presented to DHS by the Virginia DMV through written communications dated September 19, 2012, January 25, 2013, January 9, 2014, April 15, 2015, June 30, 2015 and October 1, 2019.

- b. Permit existing DL/ID holders to perform a secure online verification of their US Permanent Resident Card via the Systematic Alien Verification for Entitlements (SAVE) to obtain a REAL ID compliant card**

Virginia Proposed Process

Current DL/ID holders will log into their secure Virginia DMV online account to initiate a verification of their US permanent resident card. The system will prompt them to enter their United States Citizenship and Immigration Services (USCIS) number and card expiration date and an inquiry will be electronically submitted via SAVE.

**[This proposed process requires adding a field for US permanent resident card expiration date to the SAVE verification transaction.]**

Estimated Increase in REAL ID Adoption Rate / Additional Staff Time Realized / Cost Savings

The current number of active DL/ID holders across all Virginia DMV records that presented a US Permanent Resident Card is approximately 350,000.

- If **half** of these individuals utilize the online verification, it would free up approximately 50,000 staff hours to allow for other customers to be served. This assumes each REAL ID takes 17 minutes per transaction in the customer service center. If half of Virginians with a permanent resident card chose to go online to get a REAL ID, an estimated additional 175,000 Virginians would potentially obtain a REAL ID credential. This change would allow us to process more REAL IDs for customers through our combined in-person and online service channels than we would be able to accomplish under the current requirements, and to do so in a more cost-effective manner.

- If **a quarter** of these individuals utilize the online verification, it would free up approximately 25,000 staff hours to allow for other customers to be served. This assumes each REAL ID takes 17 minutes per transaction in the customer service center. If half of Virginians with a permanent resident card chose to go online to get a REAL ID, an estimated additional 88,000 Virginians would potentially obtain a REAL ID credential. This change would allow us to process more REAL IDs for customers through our combined in-person and online service channels than we would be able to accomplish under the current requirements, and to do so in a more cost-effective manner.

IT Estimate / Conditions / Assumptions

Once the field for permanent resident card expiration date has been added by SAVE to the verification transaction, Virginia DMV would require 3 months to program and test this transaction.

It is recommended that SAVE include 24/7 system availability or the most system availability as possible with the understanding it may be necessary to have established maintenance windows.

Additionally, Virginia DMV recommends that a 3-try enforcement rule be enacted for added security.

Cost to Implement

Approximately \$60,000

**c. Create an electronic verification system to allow states to verify Transportation Worker Identification Credentials (TWIC)**

Proposed Process

Current DL/ID holders will log into their secure Virginia DMV online account to initiate a verification of their TWIC. The system will prompt them to enter the required data fields and an inquiry will be electronically submitted.

**[No system is currently available to jurisdictions for the verification of TWICs. To offer this online service to existing DL/ID holders would require the Department of Homeland Security (DHS) to develop or provide states with access to an electronic verification system.]**

Estimated Increase in REAL ID Adoption Rate / Additional Staff Time Realized / Cost Savings

In May 2014, nationwide there were 3,000,000 people with a TWIC card. Based on the fact that 3 percent of the total U.S. population resides in Virginia, it is estimated that 90,000 Virginians hold a TWIC card.

- If **half** of these individuals utilize the online verification, it would free up approximately 13,000 staff hours to allow for other customers to be served. This assumes each REAL ID takes 17 minutes per transaction in the customer service center. If half of Virginians with a TWIC chose to go online to get a REAL ID, an estimated additional 45,000 Virginians would potentially obtain a REAL ID credential. This change would allow us to process more REAL IDs for customers through our combined in-person and online service channels than we would be able to accomplish under the current requirements, and to do so in a more cost-effective manner.
- If **a quarter** of these individuals utilize the online verification, it would free up approximately 6,500 staff hours to allow for other customers to be served. This assumes each REAL ID takes 17 minutes per transaction in the customer service center. If half of Virginians with a TWIC chose to go online to get a REAL ID, an estimated additional 22,500 Virginians would



potentially obtain a REAL ID credential. This change would allow us to process more REAL IDs for customers through our combined in-person and online service channels than we would be able to accomplish under the current requirements, and to do so in a more cost-effective manner.

IT Estimate / Conditions / Assumptions

Once a system is made available by DHS, Virginia would require approximately 6 months to program and implement this electronic verification system. This would be programmed concurrently with other new electronic verification systems.

It is recommended that SAVE include 24/7 system availability or the most system availability as possible with the understanding it may be necessary to have established maintenance windows.

Additionally, Virginia DMV recommends that a 3-try enforcement rule be enacted for added security.

Cost to Implement

One combined cost of \$96,000 will be expended to implement all new electronic verification systems

- d. **Create an electronic verification system to allow states to verify DHS Trusted Traveler Cards**
- **Global Entry**
  - **NEXUS**
  - **Secure Electronic Network for Travelers Rapid Inspection (SENTRI)**
  - **Free and Secure Trade for Commercial Vehicles (FAST)**

Proposed Process

Current DL/ID holders will log into their secure Virginia DMV online account to initiate a verification of their Trusted Traveler Card. The system will prompt them to enter the required data fields and an inquiry will be electronically submitted.

**[No system is currently available to jurisdictions for the verification of DHS Trusted Traveler Cards. To offer this online service to existing DL/ID holders would require DHS to develop or provide states with access to electronic verification services for these cards.]**

It is recommended that DHS include 24/7 system availability for these verification systems or the most system availability as possible with the understanding it may be necessary to have established maintenance windows.

Additionally, Virginia DMV recommends that a 3-try enforcement rule be enacted to these verification transactions for added security.

Estimated Increase in Adoption Rate and Additional Staff Time Realized / Cost Savings

It is estimated that 100,000 Virginians have been issued a DHS Trusted Traveler Card.

- If **half** of these individuals utilize the online verification, it would free up approximately 14,000 staff hours to allow for other customers to be served. This assumes each REAL ID takes 17 minutes per transaction in the customer service center. If half of Virginians with a DHS Trusted Traveler Card chose to go online to get a REAL ID, an estimated additional 50,000 Virginians would potentially obtain a REAL ID credential. This change would allow us to process more REAL IDs for customers through our combined in-person and online service channels than we would be able to accomplish under the current requirements, and to do so in a more cost-effective manner.

- If **a quarter** of these individuals utilize the online verification, it would free up approximately 7,000 staff hours to allow for other customers to be served. This assumes each REAL ID takes 17 minutes per transaction in the customer service center. If half of Virginians with a DHS Trusted Traveler Card chose to go online to get a REAL ID instead of going into a Virginia DMV customer service center, an estimated additional 25,000 Virginians would potentially obtain a REAL ID credential. This change would allow us to process more REAL IDs for customers through our combined in-person and online service channels than we would be able to accomplish under the current requirements, and to do so in a more cost-effective manner.

IT Estimate / Conditions / Assumptions

Once verification systems are made available by DHS to verify these Trusted Traveler Cards, Virginia would require approximately 6 months to program and implement these electronic verification systems. This would be programmed concurrently with other new electronic verification systems.

Cost to Implement

One combined cost of \$96,000 will be expended to implement all new electronic verification systems.

It is recommended that SAVE include 24/7 system availability or the most system availability as possible with the understanding it may be necessary to have established maintenance windows.

Additionally, Virginia DMV recommends that a 3-try enforcement rule be enacted for added security.

**e. Create an electronic verification system to allow states to verify HSPD-12 PIV cards (US Government Employee ID cards)**

Proposed Process

Current DL/ID holders will log into their secure Virginia DMV online account to initiate a verification of their US government employee ID card. The system will prompt them to enter the required data fields and an inquiry will be electronically submitted.

**[No system is currently available to jurisdictions for the verification of HSPD-12 PIV government employee ID cards. To offer this online service to existing DL/ID holders would require the federal government to develop or provide states with access to electronic verification services for these cards.]**

Estimated Increase in Adoption Rate and Additional Staff Time Realized / Cost Savings

The Department of Labor 2018 total federal jobs estimate for Virginia is 177,000. It is assumed that all of these federal employees are holders of the HSPD-12 PIV Card.

- If **half** of these individuals utilize the online verification, it would free up approximately 25,000 staff hours to allow for other customers to be served. This assumes each REAL ID takes 17 minutes per transaction in the customer service center. If half of Virginians with a HSPD-12 PIV Card chose to go online to get a REAL ID, an estimated additional 88,500 Virginians would potentially obtain a REAL ID credential. This change would allow us to process more REAL IDs for customers through our combined in-person and online service channels than we would be able to accomplish under the current requirements, and to do so in a more cost-effective manner.
- If **a quarter** of these individuals utilize the online verification, it would free up approximately 12,500 staff hours to allow for other customers to be served. This assumes each REAL ID

takes 17 minutes per transaction in the customer service center. If half of Virginians with a HSPD-12 PIV Card chose to go online to get a REAL ID, an estimated additional 44,250 Virginians would potentially obtain a REAL ID credential. This change would allow us to process more REAL IDs for customers through our combined in-person and online service channels than we would be able to accomplish under the current requirements, and to do so in a more cost-effective manner.

#### IT Estimate / Conditions / Assumptions

Once verification systems are made available by the federal government to verify these US government employee ID cards, Virginia would require approximately 6 months to program and implement these electronic verification systems. This would be programmed concurrently with other new electronic verification systems.

It is recommended that the federal government include 24/7 system availability or the most system availability as possible with the understanding it may be necessary to have established maintenance windows.

Additionally, Virginia DMV recommends that a 3-try enforcement rule be enacted for added security.

#### Cost to Implement

One combined cost of \$96,000 will be expended to implement all new electronic verification systems

#### **f. Create an electronic verification system to allow states to verify US Department of Defense identification cards**

##### Proposed Process

Current DL/ID holders will log into their secure Virginia DMV online account to initiate a verification of their US Department of Defense ID card. The system will prompt them to enter the required data fields and an inquiry will be electronically submitted.

**[No system is currently available to jurisdictions for the verification of US Department of Defense ID cards. To offer this online service to existing DL/ID holders would require the US Department of Defense to develop or provide states with access to electronic verification services for these cards.]**

##### Estimated Increase in Adoption Rate and Additional Staff Time Realized / Cost Savings

According to the Defense Manpower Data Center, as of September 30, 2018, the Commonwealth of Virginia is home to approximately 126,000 active duty military and 26,000 National Guard and Reserve Forces. Virginia has the second largest active duty population in the United States. Additionally, one in twelve Virginians is a veteran.

Residents who are currently in the military or the Reserves have already met the federal burden of proof to obtain their military identification. If Virginia DMV were to allow those with valid military identification to obtain a REAL ID online, potentially 152,000 people would obtain a REAL ID in Virginia.

- If **half** of these individuals used an online system to obtain a REAL ID instead of coming into an office, it would free up approximately 21,000 staff hours to allow other customers to be served. This assumes each REAL ID takes 17 minutes per transaction in the customer service center. If all Virginians with military identification chose to go online to get a REAL ID, an estimated additional 76,000 Virginians would potentially obtain a REAL ID credential. This change would allow us to process more REAL IDs for customers through our combined in-

person and online service channels than we would be able to accomplish under the current requirements, and to do so in a more cost-effective manner.

- If a **quarter** of these individuals used an online system to obtain a REAL ID instead of coming into an office, it would free up approximately 11,000 staff hours to allow other customers to be served. This assumes each REAL ID takes 17 minutes per transaction in the customer service center. If all Virginians with military identification chose to go online to get a REAL, an estimated additional 38,000 Virginians would potentially obtain a REAL ID credential. This change would allow us to process more REAL IDs for customers through our combined in-person and online service channels than we would be able to accomplish under the current requirements, and to do so in a more cost-effective manner.

#### IT Estimate / Conditions / Assumptions

Once verification systems are made available by the US Department of Defense to verify these US Department of Defense ID cards, Virginia would require approximately 6 months to program and implement this electronic verification system. This would be programmed concurrently with other new electronic verification systems.

It is recommended that the Department of Defense include 24/7 system availability or the most system availability as possible with the understanding it may be necessary to have established maintenance windows.

Additionally, Virginia DMV recommends that a 3-try enforcement rule be enacted for added security.

#### Cost to Implement

One combined cost of \$96,000 will be expended to implement all new electronic verification systems.

## **II. Recognize electronic verification of social security number via Social Security Online Verification (SSOLV) in lieu of requiring presentation of a physical document**

#### Justification

Social security numbers are verified with the Social Security Administration (SSA). Also requiring the presentation of a physical document as proof of social security number poses a significant burden to customers without also offering significant benefit. Additionally, requiring individuals to carry physical documentation with their full legal name and social security number places them at risk of losing the document and falling victim to identity theft.

#### Proposed Process

Applicants for a REAL ID DL/ID will provide their SSN on the DL/ID application. Virginia DMV will send this number along with the applicant's name and date of birth electronically to SSOLV for verification. Both the information sent for verification and the SSOLV response will be maintained in the customer record.

- If all data fields are confirmed, the person will be considered to have met the proof of SSN requirement.
- If all data fields are not confirmed via SSOLV, the individual will not be issued a credential and will need to work with the Social Security Administration to resolve any discrepancy.

#### Estimated Increase in Adoption Rate / Reduced Customer Return Rates

It is estimated that **14%** of Virginians are turned away at the Virginia DMV information counter for not having with them adequate paper documentation of their social security number.

To date, if Virginia DMV had the ability to verify social security numbers through SSOLV without also requiring paper documentation, an estimated 116,000 additional customers would have potentially obtained a REAL ID on their first visit to Virginia DMV, thus eliminating a second visit which takes up additional time for customers and Virginia DMV staff. This is based on 830,000 REAL IDs issued as of November 2019. It is important to note that although no statistics are available, it is reasonable to assume a portion of the 116,000 customers originally turned away for lack of proof of SSN would decide against returning to Virginia DMV to obtain a REAL ID.

Note: A survey was conducted at six Virginia DMV customer service center locations of varying sizes and in different regions to determine how many customers are turned away.

IT Estimate

Virginia DMV would require 1 month for implementation.

Cost to Implement

Approximately \$2,000

**Note:** This concept was presented to DHS by the Virginia DMV through written communications dated January 9, 2014, April 15, 2015, and August 4, 2016.

**III. Eliminate the requirement to re-verify the SSN of customers renewing a REAL ID DL/ID**

Justification

The benefit to this change is that states would no longer need to expend system resources and pay the Social Security Administration (SSA) to re-verify SSNs that have already been verified.

Proposed Process

Discontinue the monthly batch SSN verification process currently taking place for REAL ID DL/IDs up for renewal.

Annual Cost Savings

\$12,485.35

Virginia utilizes a batch verification process to re-verify SSNs of individuals up for renewal of their REAL ID DL/ID. Rather than a per inquiry fee, the SSA charges a set annual fee to utilize batch verification. Because REAL ID is the only reason Virginia uses this process, if this requirement is eliminated, Virginia would no longer be responsible for this annual fee.

IT Estimate

Virginia DMV would require 1 month for implementation.

**Note:** This concept was presented to DHS by the Virginia DMV through written communications dated January 25, 2013, January 9, 2014, April 15, 2015, and August 4, 2016

**IV. Permit states to use Electronic Verification of Vital Events (EVVE) certification of US birth documents for proof of identify and lawful status**

Justification

This process would assist US citizens who do not have a certified copy of their US birth certificate to present to Virginia DMV during their REAL ID application process. States should be authorized to utilize the EVVE birth certification process in lieu of presenting a physical US birth document. This process has been deemed to meet federal proof of identification requirements as it is

currently authorized for the issuance of a Transportation Worker Identification Credential (TWIC) and TSA Pre-check approval/authorization.

Proposed Process

Rather than turning these individuals away and requiring a subsequent Virginia DMV visit, applicants will be permitted to present EVVE required proofs of ID, submit identifying information from their birth record and have their official birth record certified.

This process actually offers benefits over and above the presentation of a physical document as in this case, there is a confirmation that the record exists at the issuing authority.

Estimated Increase in Adoption Rate

Since October 2018, 3,185 customers who were born out-of-state received a successful match when EVVE birth certification was utilized in Virginia DMV customer service centers to obtain a standard (non-compliant) DL/ID. An additional 709 customers accessed Virginia DMV's online EVVE transaction during the same time frame. Together, 3,894 customers would have been eligible to use this successful query for proof of identity for a REAL ID credential.

Since Virginia DMV began issuing REAL IDs in October 2018, usage of EVVE has declined because the certification is not allowed to be used as proof of identification for REAL ID. In FY 2018, on average 633 customers were utilizing EVVE each month. As of October 2019, the average monthly usage is approximately 177 customers per month. This equates to a 72 percent decline in EVVE usage over the past year.

If EVVE certification is allowed to be utilized as proof of identification, it would eliminate potential lengthy delays customers may experience when obtaining their birth certificate document from other states/jurisdictions.

IT Estimate / Conditions / Assumptions

Virginia DMV would require 6 weeks for implementation.

Cost to Implement

Approximately \$10,000

**Note:** This concept was presented to DHS through written communications dated January 9, 2014, April 15, 2015, and October 1, 2019

**V. Eliminate the need for states to image proof document if they have been imaged by another state**

Justification

Because this individual will have already had their REAL ID proof documents scanned and maintained by a state, it would be redundant to also scan and maintain those documents during subsequent application transactions in different states.

Eliminating the requirement to scan proof documents for customers who already have proof documents stored in another state's records will not only constitute a time and resource savings but it will also minimize possible exposure of individuals who move from state to state; requiring only one state to maintain images translates to fewer possibilities of personal information being jeopardized.

Proposed Process

When an applicant for a Virginia credential surrenders a REAL ID license or ID card, an indicator will be placed on the customer record. This indicator will waive the requirement that Virginia's customer service representative scan proof documents presented.

IT Estimate / Conditions / Assumptions

Virginia DMV would require 2 months for implementation.

Cost to Implement

Approximately \$12,000

In addition to the proposals above, reciprocity for REAL ID status is recommended. Based on *Va. Code*, applicants for a credential are required to appear in person and present proof of identity, legal presence, social security number and proof of Virginia residency so reciprocity would not benefit Virginia. However, it may benefit other states with different laws that would permit such reciprocity. States current exchange certain driving privileges such as commercial privileges and license classifications and endorsements so this would be consistent with current practice.

When adopting any of these changes, Virginia DMV strongly recommends that DHS establish a listing of acceptable processes rather than mandating specific requirements. This will provide the states with necessary flexibility to utilize those processes that best fit their situations, laws and capabilities.

It is further recommended that DHS ensure no national database is established and that wherever possible, federal access to state databases is strictly controlled and limited to official business as it relates to specific individuals rather than any sharing of bulk data.