18 October 2007

The Honorable Edolphus Towns
Chairman
Subcommittee on Government Management,
Organization, and Procurement
Committee on Oversight and Government Reform
2157 Rayburn House Office Building
Washington, DC 20515-6143

Dear Congressman Towns:

I am honored to be asked to submit testimony on the subject of "Technology for Secure Identity Documents". Vermont is continually employing technologies that will ensure our documents are secure. Since the driver's license is the mostly widely accepted form of identification it is necessary that the process for issuing and the document given to our citizens is as secure as possible.

Attached are Vermont's written comments and I look forward to giving an oral summary at the hearing.

<div style="text-align: center;">Very truly yours,</div>

<div style="text-align: center;">Bonnie L. Rutledge
Commissioner</div>

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Vermont Department of Motor Vehicles current business process for the issuance of a standard license

Over the years a Drivers License has become the most widely accepted form of identification. It is the heart of our identification infrastructure and is taking a central role in the efforts to protect our homeland. While credentials can be made as "tamper proof" as possible, if the issuance process is not secure, the preponderance of identity document fraud will continue. Most fraud is committed by criminals enrolling in a system under a false identity. The State of Vermont has sound technology, policies and business systems in place to ensure the security of our license.

It is our goal to ensure that every individual is limited to one license document, and one driver control record

- Employees issuing a Vermont Driver License or Identification Card (DL/ID) are subject to criminal background checks.
- One employee completes the entire process from application to processing of the DL/ID, eliminating the possibility of "customer swap" whereby customers attempt to switch during the process.
- All materials used for license production are inventoried and stored in secure locations
- Various electronic checks are performed to validate Social Security Numbers, and to ensure the customer does not have another license or any outstanding suspensions.
- Standards are in place for computer security and unauthorized access. Audit trails will be maintained to support security and access functions. The State's Department of Information and Innovation (DII) and Agency of Transportation (AOT) both require personal user log-ins and passwords. The digital capture workstations (DCW) cannot be accessed without proper authorization and proper security dongle. All access creates an audit trail.
- Our employees all receive fraudulent document recognition training.
- We have adopted privacy principles and practices to ensure the protection and confidentiality of all personal information contained in the agency's records

Current workflow;

1) Greeter station; customers are checked in and we verify that they have proper forms and identification
2) Verification process to ensure that new applicants do not hold a driver's license from another jurisdiction
3) Applicant identity verification station; paperwork is processed, identity is verified and fees are collected
4) Vision, knowledge, and skills testing are administered if applicable
5) Image/demographic information capture station, customers photo and signature are digitally captured, license is printed and handed to customer.

Vermont Department of Motor Vehicles proposed business process for the issuance of EDL/ID

The Enhanced Driver License/ Identification (EDL/ID) workflow includes the above, but adds the scanning of identification documents, adds a station to print a temporary EDL/ID, and adds a station where a short interview is conducted to further qualify applicants.

The EDL/ID will add a number of additional enhancements to include;

The State of Vermont will require full accountability for all materials, including usage and destruction. Standards will be in place for the overall security of materials used in production, and for the loss or theft of blank documents/materials. All blank document materials are to be held in a separate secure repository with controlled access. Physical inventory of all production materials is to be conducted every week. The State of Vermont must be able to, at any time during this process, have the ability to call selected contractors facility and delay printing or pull an individual driver license out of production because an investigator or police officer has identified potential duplicate, fraud, legal presence issue, or other potential problem during the document authentication and data verification process.

Enhanced Driver license / ID cards will include document security features designed to deter forgery and counterfeiting and promote confidence in the card format.

Vermont cards are compliant with material and design standards of the American Association of Motor Vehicle Administrator's (AAMVA) card security framework, a national driver license card security standard. Vermont uses watermarking, micro-printing, fine line background, Tri-Color Polasecure with UV which incorporates three-color graphic designs printed on the inside of the laminate and ultraviolet sensitive inks, redundant data, overlapping graphics, ghost image, bar code and magnetic stripe.[1]

The face of the card will contain name, date of birth, gender, full facial photograph, address, signature, issuance/expiration date and citizenship.

Each document will contain, at the minimum, the issue date, the citizens date of birth, gender, address, signature, Vermont license number and a full color full facial photograph. A Gen 2 vicinity Radio Frequency Identification (RFID) chip will be imbedded in the enhanced DL/ID card in compliance with DHS security standards. Citizenship status will be depicted on the enhanced driver license. The back of the DL/ID will also have a machine readable zone (MRZ) which will facilitate border crossing at locations not RFID capable. The EDL will be clearly distinguishable from a standard Vermont DL.

Issuance Procedures for the enhanced DL/ID will demonstrate an applicant's eligibility.

DMV licensing staff will determine eligibility by authenticating the documents submitted and conducting investigative applicant interviews to determine identity and citizenship. One acceptable document is a valid U.S. Passport. Other acceptable documents include a certified state birth certificate, Certificate of Naturalization, or Certificate of Citizenship; an expired U.S. Passport, or a Department of State Consular Report of Birth Abroad.

Address verification will be utilized to verify the address with the U.S. Postal Service and confirm the applicant's address is valid. Social Security electronic verification will be utilized to verify every number with the Social Security Administration. Signature comparisons will be conducted on every applicant when possible.

All applicants for EDL/ID will be subject to an interview. The interview is designed to further establish a link between the applicant and the source documents. Staff will receive additional investigative interview training to look for behaviors that may suggest an imposter or intent to commit fraud. This additional step, coupled with new web-based technology and authentication of source and identity documents by trained staff significantly increases the reliability of the application and approval process.

Technology Requirements

Vermont's EDL/ID will use facilitative technology and share biographic information (including photo) with DHS.

DMV will employ facilitative technology in the enhanced DL/ID. The enhanced card will incorporate both the vicinity RFID chip and MRZ. In addition, border crossing personnel will have electronic connectivity to DMV.

The vicinity RFID or MRZ technology will assist border crossing personnel by providing a unique identifier. The unique identifier will be used to provide DHS with digital photos, biographic information and validity information. RFID technology will provide information prior to the vehicle arriving at the inspection booth. Real-time access will be used to validate the enhanced DL/ID with DMV's database.

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[1] **Watermarking** – details limited to law enforcement

Micro-printing - Commonly found on national currencies, micro-printing complicates any attempt at photocopying due to the resolution required to recreate the feature. It can be read with an eight (8x) power magnifier.

Fine line background - a pattern of fine lines, similar to those found on national currencies

Tri-Color Polasecure with UV - three optically variable inks printed on the card's inner laminate. Optically variable inks appear and disappear with the variation of the viewing angle and make attempted alterations readily apparent.

Redundant data – Certain data elements are repeated, some obvious and some contained within barcodes

Overlapping graphics – placing information over the picture to complicate any attempt to change the picture. State seal and commissioners signature overlap the photo.

Ghost image – printing the picture in more than one location

Bar code – 2D bar code encoded with AAMVA minimum standards

Magnetic stripe – magnetic stripe contains Name, DOB, Height, Weight