

Interim Benchmarks (Material Compliance Checklist)

Does the State:

1. Subject each applicant to a mandatory facial image capture and retain such image even if a drivers' license (DL) or identification card (ID) is not issued
2. Have each applicant sign a declaration under penalty of perjury that the information presented is true and correct, and retain this declaration pursuant to § 37.31.
3. Require an individual to present at least one of the source documents listed in subsections 37.11 (c)(1)(i) through (x) when establishing identity
4. Require documentation of:
 - Date of birth
 - Social Security Number
 - Address of principal residence
 - Evidence of lawful status
5. Have a documented exceptions process that meets the requirements established in 37.11(h)(1)-(3) (if States choose to have such a process)
6. Make reasonable efforts to ensure that the applicant does not have more than one DL or ID already issued by that State under a different identity
7. Verify lawful status through SAVE or another method approved by DHS
8. Verify Social Security account numbers with the Social Security Administration or another method approved by DHS
9. Issue DL and IDs that contain Level 1, 2 and 3 integrated security features
10. Surface (front and back) of cards include the following printed information in Latin alpha-numeric characters:
 - Full legal name
 - Date of birth
 - Gender
 - Unique DL/ID number
 - Full facial digital photograph
 - Address of principal residence [with exceptions]
 - Signature [with exceptions]
 - Date of transaction
 - Expiration date
 - State or territory of issuance
11. Commit to mark materially compliant DL and IDs with a DHS-approved security marking
12. Issue temporary or limited-term licenses to all individuals with temporary lawful status and tie license validity to the end of lawful status
13. Have a documented security plan for DMV operations in accordance with the requirements set forth in § 37.41
14. Have protections in place to ensure the security of personally identifiable information
15. Require all employees handling source documents or issuing DLs or IDs to attend and complete the AAMVA approved (or equivalent) fraudulent document recognition training and security awareness training
16. Conduct name-based and fingerprint-based criminal history and employment eligibility checks on all employees in covered positions or an alternative procedure approved by DHS
17. Commit to be in material compliance with Subparts A through D no later than January 1, 2010 or within 90 days of submission of this document, whichever date is earlier
18. Clearly state on the face of non-compliant DLs or IDs that the card is not acceptable for official purposes, except for licenses renewed or reissued under § 37.27