

## **Testimony for Pennsylvania Senate Communications & Technology Committee February 8, 2017**

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My testimony today is presented at the request of the Committee. It is intended to provide overviews of the varied experiences of states that are now determined by the U.S. Department of Homeland Security, to be compliant with the REAL ID Act rules. Hereafter, I will use the acronym DHS for that federal department. For the sake of time, my spoken testimony will only recap the written testimony to ensure there is ample time for questions.

### **REAL ID Act Background**

The following provides the Committee and those attending the hearing with a summary reference to the REAL ID Act, as a context for the legislators' current considerations regarding compliance.

The provisions of the REAL ID Act originated in the House of Representatives' Version of the Intelligence Reform Act of 2004, Public Law 108-458. It was the declared purpose of the Intelligence Reform Act to address both the recommendations of the 9/11 Commission and the deficiencies in homeland security noted by Congressional Investigations. Then Chairman of the House of Representatives Committee on the Judiciary F. James Sensenbrenner and other House conferees disagreed strongly with the final conference version. To make the point clearly, two of the designated conferees refused to sign the conference report and resolved to re-introduce the components excluded by the final version of PL 108-458 endorsed by President Bush. The REAL ID Act of 2005 passed the House on February 9, 2005 and was attached to a must pass appropriations bill to expedite its consideration by the Senate. Following extensive conferences, it was enacted into law on May 11, 2005, Public Law 109-13.

There was an effort to repeal and replace Title II of the REAL ID Act in 2009. A bill purportedly drafted by then Secretary of Homeland Security Janet Napolitano was introduced by Senator Daniel Akaka of Hawaii. The bill was entitled the PASS ID Act of 2009. It was considered by a single Senate Committee in the 111th Congress (2009-2010), but was subsequently removed from the Senate legislative schedule and was not voted upon.<sup>i</sup> Subsequently, the state of Hawaii became REAL ID compliant in 2013. Other bills to repeal and/or revise Title II of the REAL ID Act have

subsequently been introduced by Senator Tester of Montana, including one within the past month, but none have been considered by the Senate.

The REAL ID Act encompasses much more than the driver's license provisions of Title II, although the public and most state legislators only know it as a driver's license regulatory measure. The other provisions of the REAL ID Act and their importance to the homeland security initiatives of the past two administrations make it unlikely that House leadership will consider bills that open the entire act for modification. F. James Sensenbrenner, initiator and primary author of the REAL ID Act is the current Chairman of the Immigration Subcommittee of the House Judiciary Committee. Chairman of the House Committee on the Judiciary Bob Goodlatte was a co-sponsor of the REAL ID Act as was Speaker of the House Paul Ryan. As the primary Committee of Jurisdiction for any modification of the REAL ID Act, the Committee on the Judiciary would have to approve any further action on any bill to amend it. Paul Ryan and James Sensenbrenner each represent districts in Wisconsin, which state has been REAL ID compliant since 2013. The Vice President, Mike Pence, was Governor of Indiana, a state compliant with REAL ID since 2009.

Further, should a Senate bill to amend the REAL ID Act actually be referred to the House of Representatives, it would require approval by other Committees of Jurisdiction, especially the Committee on Government Reform and the Committee on Transportation and Infrastructure.

In the context of describing the specifics of the REALID Act, legislators should be aware that the new Administration is pursuing its plans for fencing on the Southern Border under the authorities under Titles I and III of the REAL ID Act:

*The major provisions of the REAL ID Act, most of which do NOT address driver's licenses are the following:*

*TITLE I--AMENDMENTS TO FEDERAL LAWS TO PROTECT AGAINST TERRORIST ENTRY; [eleven (11) pages in length]; Title I*

*(a) modifies the eligibility criteria for asylum and withholding of removal of persons subject to the Immigration and Nationality Act;*

*(b) Limits judicial review of certain immigration decisions;*

*(c) Expands the scope of terror-related activity making an alien inadmissible or deportable, as well as ineligible for certain forms of relief from removal; in particular, Section 103(c) of the REAL ID Act amends the definition of "terrorist organization" [found in INA § 212(a)(3)(B)(vi)] to expand and clarify how personal associations with a terrorist organization*

*may result in felony charges. The changes especially impact noncitizens that raise funds to support terrorist activity, and family members of terrorists who are accessories by failing to alert authorities.*

*(d) Title I, Section 102, grants broad authority to the Secretary of Homeland Security with regard to border fences and barriers.<sup>ii</sup>*

*TITLE II--IMPROVED SECURITY FOR DRIVERS' LICENSES AND PERSONAL IDENTIFICATION CARDS; [five 9(5) pages long] Contents of this title are described below.*

*TITLE III--BORDER INFRASTRUCTURE AND TECHNOLOGY INTEGRATION*

*Title III requires the Department of Homeland Security to improve U.S. security and improve inter-agency communications and information sharing, as well as establish a ground surveillance pilot program on the nation's borders.*

*TITLE IV--TEMPORARY WORKERS addressed limits for the H2 B Workers category of seasonal and short term foreign worker visas, added anti-fraud measures to prevent abuse.*

*TITLE V--OTHER CHANGES TO PROVISIONS GOVERNING NONIMMIGRANT AND IMMIGRANT VISAS facilitated a reciprocal visa arrangement with Australia.*

Now to the requirements of Title II of the REAL ID Act:

Title II of the REAL ID Act does not directly impose federal standards with respect to states' issuance of drivers' licenses and personal identification cards, as compliance by the states is voluntary. Further, it specifically allows state to issue both

- (1) Driver's licenses and ID cards that are issued through processes that comply with REAL ID security and be marked in a way that they can be recognized as compliant; and
- (2) Drivers' licenses and ID cards may be issued with different, presumably less restrictive security standards, provided the latter category are clearly marked as "not for federal identification purposes."

The REAL ID Act and the final regulatory rule recognize that

(a) States may opt out, as Pennsylvania did in 2012, and

(b) States may opt to issue non-compliant driver's licenses under separate criteria which is presumable less restrictive.

To the extent that states want to provide driver's licenses as an affordable means of identification for travel on commercial airlines, there needs to be a process to issue driver's licenses that are REAL ID compliant.

The REAL ID Act contains a definition of the phrase "official purpose." For purposes of the act, an "official purpose" is defined as including, but not limited to, "accessing Federal facilities, boarding federally regulated commercial aircraft, entering nuclear power plants, and any other purposes that the Secretary [of Homeland Security] shall determine."

What does Title II of the REAL ID Act NOT DO: (1) It does not provide any new authority for any federal government agency to access state driver's license records; (2) It does not authorize creation of a federal database of driver's license data; (3) It does not require nor imply that any driver's license needs to include a microchip for any purpose whatsoever. (4) It does not establish any authority for national tracking of individuals through driver's license technology nor access to record systems. (5) It does not pre-empt individual state requirements that exceed or compliment the REAL ID Act. For example, the use of facial recognition technology to prevent identity theft by many licensing agencies, and the use of fingerprint confirmation of identity by some state driver's license agencies are not required by the REAL ID Act.

**Minimum Issuance Standards.** Section 202(c) of the REAL ID Act establishes minimum issuance standards for federal recognition requiring that before a state can issue a driver's license or photo identification card, a state will have to verify with the issuing agency, the issuance, validity and completeness of: (1) a photo identification document or a non-photo document containing both the individual's full legal name and date of birth; (2) date of birth; (3) proof of a social security number (SSN) or verification of the individual's ineligibility for a SSN; and (4) name and address of the individual's principal residence.

**Evidence of Legal Status.** Section 202(c)(2)(B) of the REAL ID Act requires states to verify an applicant's legal status in the United States before issuing a driver's license or personal identification card.

**Temporary Drivers' Licenses and Identification Cards.** Section 202(c)(2)(C) of the REAL ID Act establishes a system of temporary licenses and identification cards that can be issued by the states to applicants who can present evidence that they fall into one of six categories. Under the REAL ID Act rules, a state may only issue a temporary driver's license or identification card with an expiration date equal to the period of time of the applicant's authorized stay in the United States. If there is an indefinite end to the period of authorized stay, the card's expiration date is one year. The temporary card must clearly indicate that it is temporary and state its expiration date. Renewals of the temporary cards are to be done only upon presentation of valid documentary evidence that the status had been extended by the Secretary of Homeland Security. If such provisions existed prior to the enactment of the REAL ID Act, they existed as a function of state law and are preempted by the act.

**Other Requirements.** Pursuant to §202(d) of the REAL ID Act, states are required to adopt procedures and practices to: (1) employ technology to capture digital images of identity source documents; (2) retain paper copies of source documents for a minimum of seven years or images of source documents presented for a minimum of ten years; (3) subject each applicant to a mandatory facial image capture; (4) establish an effective procedure to confirm or verify a renewing applicant's information; (5) confirm with the Social Security Administration a SSN presented by a person using the full Social Security account number; (6) refuse issuance of a driver's license or identification card to a person holding a driver's license issued by another state without confirmation that the person is terminating or has terminated the driver's license; (7) ensure the physical security of locations where cards are produced and the security of document materials and papers from which drivers' licenses and identification cards are produced; (8) subject all persons authorized to manufacture or produce drivers' licenses and identification cards to appropriate security clearance requirements; (9) establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of drivers' licenses and identification cards; (10) would limit the length of time a drivers' license or personal identification card is valid to eight years.

The REAL ID Act requires that states which issue drivers' licenses that do not conform to the federal requirements in addition to those which comply, mark those cards with unique color identifier or design to alert officials that the document is not to be accepted for any official purpose. States are required to clearly state on the face of the document that it is not to be accepted for federal identification or for any official purpose. Compliant states motor vehicle records systems must contains all biographic data fields printed on the drivers' license or identification card. State

record systems must also retain motor vehicle driver histories, including violations, suspensions or “points.” This clause addressing highway safety was added by Congress because a handful of states were not complying with an existing Department of Transportation regulatory requirement aimed at keeping habitually reckless and/or driving under the influence (DUI/DWI) drivers off the road.

The act requires the states to participate in a system that allows remote confirmation of previously issued driver’s licenses in other states. This requirement is aimed at preventing individuals from holding valid driver’s license from two or more states at the same time. THE REAL ID Act DOES NOT, despite many erroneous published writings to the contrary, require states to have direct access to another state’s database or driver’s license record system. The REAL ID mandated process through which the exchange of information takes place is an existing system, called “State to State.” States may participate in the “state to state” system via an MOU whether or not they choose to become compliant with the REAL ID Act.<sup>iii</sup> State to State is managed by a group of states on a cost per transaction basis, and is operated by the American Association of Motor Vehicle Administrators (AAMVA). That is the same non-profit organization that operates a number of data systems under contract for the U.S. Department of Transportation, including the Commercial Driver’s License Information System (CDLIS) used by all the states.

### **Costs of Compliance with the REAL ID Driver’s License Rules**

Now I want to move on to the value added part of my testimony, regarding potential costs and predictable public communication complications of REAL ID Act compliance.

There are now twenty five REAL ID compliant states plus the District of Columbia, and several states soon to meet full compliance status. That provides a large range of variation in methods of approach.

Before I discuss individual states’ experience, it is important to be aware that those rules were assembled from a “working group” of states that voluntarily engaged with the U.S. Department of Homeland Security in 2005 and 2006 to draft an initial set of proposed regulations. Consequently, those states helped to shape the rules in ways that comported with some of their individual existing practices. Three of the states participating in the regulatory working group (Florida, Iowa, and New York) already had in place procedures for determining lawful presence and citizenship.

Following publication of the proposed rules in January, 2007, public comments were received and a final set of regulations were issued on January 10, 2008 by Secretary of Homeland Security Michael Chertoff. The Homeland Security Department also issued an estimated cost report and a Privacy Impact Assessment (January 11, 2008). The Privacy Impact Statement included an Attachment for Privacy Best Practices and Information Security Best Practices. I have separately provide copies of the Privacy Impact Assessment to this Committee and request that it be made part of the official record of this hearing because privacy and IT security are among the notable cost generators. The Final Rule includes extensive explanations in response to comments from individual states, and totals 284 pages in length. The Final rule was subsequently updated to extend the deadlines for compliance and the beginning of REAL ID enforcement.

In February, 2009, DHS produced a REAL ID Security Plan Guidance Handbook which is not a public document and distribution was restricted by design to states motor vehicle agencies. Presumably, PennDOT has a copy of that handbook which it can use to determine how to meet that guidance. DHS has provided state motor vehicle agencies department with detailed guidance on how to comply with the rules. There are 39 individual requirements, one of which has four components so sometimes they are described as 42 requirements.

In the broadest form of generalization, the early adopters were able to limit the costs of compliance because:

- (a) their processes were already similar to roughly fifteen of the requirements, and
- (b) they were able to gradually introduce process and systems changes using their own staff or affordable contractor support.

Several states recognized that obsolescent main frame systems need to be replaced at the outset. The system replacements were budgeted outside REAL ID compliance costs because it was recognized that operating costs would be reduced with newer technology even without the new requirements. In particular, state governments know it is costly to make software changes in obsolescent mainframe systems requiring custom software code modifications to provide on-line remote services.

There are characteristics in common among states that were early adopters of REAL ID rules, which states are determined to be compliant.

- Political recognition that non-compliance would eventually mean REAL ID enforcement would have a substantial negative effect on state residents due to large military and secure federal facilities within them. Some of these states were also keenly aware of the potential disruption to tourism at airports should they fail to comply (Delaware, Maryland, Florida, West Virginia, Colorado, Nevada, Vermont).
- State government culture of excellent management of Information Technology resources combined with close coordination with state law enforcement (Iowa, Nevada, Nebraska, Indiana, Ohio, South Dakota, Wyoming);
- Business practices that included detailed budgeting and planning on an annual basis, both for internal status reports to Governor and for legislative review.
- Legislative support for rigorous enforcement of traffic laws pertaining to state roads and federal Interstate, including prosecution of those apprehended for Vehicular Homicide, Reckless Driving, Driving Under the Influence and Driving While Drugged offenders, and comprehensive record keeping of traffic offenses.
- Willingness to redesign business practices to emphasize security, accepting a short term impact on speed of customer service during transitions to new procedures and business practices.
- Excellent capability to communicate to the public through diverse methods (radio, TV, newspapers, public outreach at community gatherings such as county and state fairs) IN ADVANCE of changes, and updating while change is underway – explaining that changes are due to federal requirements.

### **Success Stories: Conversion from Traditional to REAL ID Rules**

Some of the smoothest transitions to REAL ID compliance are Pennsylvania neighbors: Maryland and Delaware. Other states that were able to align with minimal public distress or high levels of public complaint include South Dakota, Iowa, Hawaii, Nebraska, Utah, Vermont and Tennessee. Arizona became REAL ID compliant on an expedited process in 2016, despite only reversing previous opposition to REAL ID with new legislation earlier in the same year. Each of those states leveraged existing staff to help mitigate planning and process change costs.

## **Cost Generators: Renewal Driver's Licenses in the Legacy Population and Old Mainframe Systems**

Florida, Nevada and West Virginia successfully implemented procedural and technical changes on schedule with manageable costs, but encountered resistance from their elderly and rural residents who sought renewal driver's licenses. To reduce resistance, the respective driver license agencies modified exceptions policies to better accommodate people who had lost vital records pertaining to name changes. REAL ID rules allow exceptions, but the specific exceptions granted must be noted in the state's electronic records for the applicant. The exception record is required as an audit trail to limit the opportunity for insider or applicant fraud.

Based on my organization's research, which has included direct input from administrators of compliant states, older mainframe computer systems and equivalent obsolescent software require extensive code re-writing to address REAL ID security requirements. For example, the state of Connecticut had to cancel its contract with a software vendor due to a failed software update during the course of its process changes to comply with REAL ID rules. Similarly, Arkansas experienced delays and cost overruns with its software system contractor and replaced that company with another midstream, which delayed its REAL ID compliance date.

The costs in addition to federal grants received that are publically acknowledged by states now REAL ID compliant range from \$140,000 in New Mexico to a Maryland estimate of \$48 million. Maryland's costs included extensive modernization and upgrading of computer systems to accommodate a program for issuing driver's licenses and Maryland only IDs to persons without proof of lawful presence in the United States. Initially, Connecticut estimated REAL ID compliance costs at over \$100 million, primarily for mainframe computer replacement. However, subsequent cost budgets from that state describe costs for new service centers that meet REAL ID security standards. However, many of the costs of these service centers derive from expanded Commercial Driver's License examination facilities and foreign language services for that state's program of licensing illegal immigrants.

New Mexico became compliant only in October, 2016, and its state legislature mandated a two tier approach, where both those who "opt out" of the REAL ID driver's license and illegal immigrants may apply for a non-REAL ID compliant driver's license or ID. The New Mexico Tax and Revenue Division driver's license employees have found it extremely difficult to explain the difference to the lawful residents of the state who need to renew their licenses. Typically, many choose to apply for a

REAL ID compliant driver's license, but only make that determination when they arrive at the state office location without the required documents. Others select the non-compliant driver's license option only to subsequently determine that they won't be able to board an airplane at a future date, and so are angered that they must return with documentary proofs required by REAL ID.

California, a state committed to REAL ID compliance but not yet able to meet the requirements, has produced detailed cost estimates. Largest cost factors California noted are physical security of offices, capture and storage of data, and modernization of systems. As California started its REAL ID compliance activities efforts in 2009, it has budgeted improvements over a multi-year time frame. Progress toward REAL ID compliance there was interrupted by the priority assigned by Governor Brown to issue driver's licenses to foreign nationals without proof of lawful presence, following 2014 legislation. Since the immigrant oriented program began in January 2, 2015, more than 800,000 persons have obtained driver's licenses or IDs without proof of lawful presence or immigration status. Within the last month, California received a time extension for REAL ID compliance until October, 2017.

### **Estimating the Costs for Pennsylvania's Compliance**

The only reliable source for estimating these costs is the driver's license division of PennDOT.

From the January 8, 2017 DHS letter to the Honorable Governor of Pennsylvania Tom Wolf: "Based on the information provided, the Commonwealth of Pennsylvania indicates it is not meeting the following provisions of the regulation (6 C.F.R. § 37): § 37.17 (n), § 37.23(c), § 37.25(b)(2), § 37.29 § 37.55, § 37.71(a) and § 37.51

The DHS letter explained clearly what PennDOT has not been able to undertake due to Act 38, and hence what PennDOT must accomplish as soon as possible. :

- (1) Commits to marking fully compliant DL and IDs with a DRS-approved security marking. ***Pennsylvania law prevents compliance with this requirement.***
- (2) Requires in person re-issuance when there is any material change in personally identifiable information since prior issuance, as defined in § 37.03. Such information shall be verified as specified in 37.13.
- (3) Prohibits the remote renewal of REAL ID DL/ID when there is a material change in personally identifiable information, as defined in §37.03
- (4) Does not permit an individual to hold more than one REAL ID

document, and no more than one DL.

- (5) Commits to be in full compliance with Subparts A through D.  
***Pennsylvania law prevents compliance with this requirement***
- (6) Submitted Final Certification package. ***Pennsylvania law prevents compliance with this requirement.***
- (7) If the State chooses to issue both compliant and noncompliant documents, clearly states on the face of the noncompliant document and in the machine readable zone that the card is not acceptable for official purposes and incorporates a unique design or color indicator that clearly distinguishes them from compliant licenses and identification card. ***Pennsylvania law prevents compliance with this requirement.***

If the Commonwealth elects to offer a choice to residents to “opt in,” to the REAL ID requirement, it will likely be less costly and incur less cost if the state emphasizes the utility of obtaining the REAL ID compliant driver’s license. That is the option taken by Arizona, which describes its REAL ID compliant driver’s license as the “Voluntary Travel ID.” Arizona has recently generated a public awareness campaign that those “opting out” of REAL ID compliance will likely face inconvenience boarding airplanes in the future, to encourage residents to “opt in.”

*The Arizona Voluntary Travel ID is the credential that complies with the federal REAL ID Act of 2005. The Voluntary Travel ID will be available as both a driver license and identification card. As its name suggests, Arizona residents will have the option to obtain a Voluntary Travel ID. The Voluntary Travel ID will serve as adequate documentation to pass through airport security to board commercial aircraft as well as access restricted areas in federal facilities, nuclear power plants and military facilities*

### **What Happens If Pennsylvania Doesn’t Repeal Act 38**

Clearly, the enforcement of REAL ID residents will begin in June, 2017. Based on our review of federal facilities and military bases within the state in January, 2017, between 25,000 and 100,000 Pennsylvania residents will need alternative Identification Documents to access their place of work, to access customers, or to obtain retirement benefits.

Unless a major shift in policy and plans of the Transportation Security Agency occurs in the interim, beginning January, 2018 many more will need alternative IDs. Based

on enrollment statistics at Pennsylvania airports, three million to six million state residents will need alternative IDs to board commercial airlines for business or leisure trips. Beyond airport congestion, it is likely that convention business will be detrimentally affected.

To illustrate, I cite from an article from the Andrews Air Force Base Newsletter of last week:

*“Real ID Act adds implications to base access; By 11th Wing Public Affairs, Feb 3, 2017.*

*Individuals possessing certain state-issued identification cards or driver’s licenses cannot gain unescorted access Air Force Installations due to the service’s compliance with the Real ID Act.*

*‘With the continued advancement of counterfeiting capabilities, it is important the United States maintain a minimum standard for identification media used for access to its military and other government facilities,’ Steve Hubbard, 11th Security Support Squadron deputy director, said. “This helps ensure when our visitor control center staff and gate sentries inspect a visitor’s ID, they have specific items and markers they can look for to confirm the ID is not fake.’*

*The change is following the initial restrictions for IDs from Minnesota, Missouri and Washington in August 2016. The states that are restricted from Air Force Installations as of Jan. 27, 2017 are Maine and Minnesota. Alternative forms of identification to be used to access Air Force installations are: Department of Homeland Security trusted traveler cards, U.S. passports, federal or state agency-issued IDs with a picture, personal identity verification cards, permanent resident cards, veterans identification cards or employment authorization documents with a picture.*

*If extensions (are) not granted to Alaska, California, Oklahoma, Oregon, Minnesota, Missouri, Washington and Virginia by June 6, 2017, their IDs will also become non-compliant.”<sup>iv</sup> [California received an extension to October, 2017 very recently ]*

I look forward to your questions.

## END NOTES

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<sup>i</sup> Senate 1261 (200902010) Sponsor: Daniel K. Akaka, Summary: A bill to repeal title II of the REAL ID Act of 2005 and amend title II of the Homeland Security Act of 2002 to better protect the security, confidentiality, and integrity of personally identifiable information collected by States when issuing driver's licenses and identification documents, and for other purposes. (Congressional Research Service calendar report) .

<sup>ii</sup> "Notwithstanding any other provision of law, the Secretary of Homeland Security shall have the authority to waive all legal requirements such Secretary, in such Secretary's sole discretion, determines necessary to ensure expeditious construction of the barriers and roads under this section. Any such decision by the Secretary shall be effective upon being published in the Federal Register. `(2) FEDERAL COURT REVIEW- `(A) IN GENERAL- The district courts of the United States shall have exclusive jurisdiction to hear all causes or claims arising from any action undertaken, or any decision made, by the Secretary of Homeland Security pursuant to paragraph (1). A cause of action or claim may only be brought alleging a violation of the Constitution of the United States. The court shall not have jurisdiction to hear any claim not specified in this subparagraph. `(B) TIME FOR FILING OF COMPLAINT- Any cause or claim brought pursuant to subparagraph (A) shall be filed not later than 60 days after the date of the action or decision made by the Secretary of Homeland Security. A claim shall be barred unless it is filed within the time specified. `(C) ABILITY TO SEEK APPELLATE REVIEW- An interlocutory or final judgment, decree, or order of the district court may be reviewed only upon petition for a writ of certiorari to the Supreme Court of the United States.' H.R.1268 Emergency Supplemental Appropriations Act for Defense, the Global War on Terror, and Tsunami Relief, 2005 (Enrolled Bill [Final as Passed Both House and Senate] - ENR)

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### DIVISION B--REAL ID ACT OF 2005

- <sup>iii</sup> [www.aamva.org/StatetoState](http://www.aamva.org/StatetoState); The State-to-State (S2S) Verification Service is a means for states to electronically check with all other participating states to determine if the applicant currently holds a driver license or identification card in another state. State participation in S2S is voluntary. The platform that supports S2S—the State Pointer Exchange Services (SPEXS)—was successfully implemented in July 2015. The key business requirements satisfied by S2S include:
  - Limit a person to one DL:
  - Enable a State to determine if a person holds a DL or identification card in another State
  - Enable a State to send a request to another State to terminate a DL/ID
  - Provide information on all state issued DL/ID's nationwide:
  - Enable States to verify DL/ID cards presented as a form of identification
  - For states wanting to be compliant with REAL ID, limit a person to one REAL ID card (whether DL or ID):
  - Enable a State to determine if a person holds a REAL DL or REAL Identification Card in another State

**Participation in S2S does not commit a State to be in compliance with the federal REAL ID Act. However, if a State chooses to be REAL ID compliant, S2S can be part of their compliance plan.**

<sup>iv</sup> For access to Joint Base Andrews, questions can be directed to the visitor's control center. This change may also affect access to any federal facilities. For information about the Real ID Act, please visit [www.dhs.gov](http://www.dhs.gov). [http://www.dcmilitary.com/andrews\\_gazette/news/real-id-act-adds-implications-to-base-access/article\\_f1a932fa-2cd2-5802-acaf-f8df5e32c63d.html](http://www.dcmilitary.com/andrews_gazette/news/real-id-act-adds-implications-to-base-access/article_f1a932fa-2cd2-5802-acaf-f8df5e32c63d.html)