

Midwest Cross-Jurisdictional Image Verification

Final Report
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16. Abstract The Iowa Department of Transportation's (DOT's) Midwest Cross-Jurisdictional Image Verification project was a multi-state (Iowa, Illinois, Nebraska, and South Dakota) project employing an interstate image verification program to detect and prevent commercial driver's license (CDL) fraud. This report documents the existing resources and workflows of the participating state driver's license agencies (SDLAs), subsequent project-related efforts and impacts, and the level of cross-jurisdictional fraud uncovered. The project demonstrated that four state driver's licensing agencies can successfully communicate and exchange data to systematically identify possible CDL fraud involving multiple agencies.					
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- Nebraska Department of Motor Vehicles Fraud Unit
- South Dakota Department of Public Safety Driver Licensing Program
- IDEMIA

EXECUTIVE SUMMARY

Objectives

This project aimed to ultimately improve commercial motor vehicle safety through the following:

- Prevent cross-state commercial driver's license (CDL) fraud among the four participating states
- Establish a replicable model that could be used by or expanded to other state driver's license agencies (SDLAs) for nationwide, multi-jurisdictional, fraud detection and prevention

Project Scope

As part of the Midwest Cross-Jurisdictional Image Verification project, the Iowa State University (ISU) research team was responsible for the following:

- Document the resources and workflows of the four participating SDLAs and all project-related efforts and impacts
- Evaluate the amount of cross-jurisdictional fraud uncovered

Background

Facial Recognition Technology

Facial recognition (FR) is a biometric software application that can assist with identifying a specific individual in a digital image or across multiple images by analyzing and comparing facial features.

FR helps state departments of motor vehicles (DMVs) identify fraud and theft and correct clerical errors, among other benefits, by comparing applicants' photos to other driver's license application photos, booking photos, etc.

Illinois first began using FR to review driver's license applications in 1999, and the technology has since become widely used by DMVs across the United States. As of 2015, more than 40 states used FR.

Midwest Cross-Jurisdictional Image Verification Project

In 2015, the Iowa Department of Transportation (DOT) Motor Vehicle Division (MVD) received a Federal Motor Carrier Safety Administration (FMCSA) CDL Program Implementation Grant to initiate the Midwest Cross-Jurisdictional Image Verification project.

The Iowa DOT was the lead agency for the project, with Illinois and Nebraska as the original partner states and South Dakota joining later.

Before the project was initiated, all four participating SDLAs used IDEMIA's (formerly MorphoTrust's) Biometric Identification (BI) platform for FR. FR enabled each state to identify, flag, and prevent potential driver's license fraud within its respective jurisdiction.

However, no collaboration existed among the four participating SDLAs to cross-check and detect CDL identity fraud that occurred across state lines. The BI platform was extended to enable the communication and exchange of data with cooperating entities, facilitating the cross-jurisdictional effort.

Image sharing among states began incrementally. Iowa and Nebraska began sharing images in July 2018, and Nebraska and South Dakota began sharing images in October 2018. The project was fully implemented, with images being shared among all states, in December 2018.

Research Description

In the early stages of the project, the research team gathered information from each of the four participating SDLAs regarding their use of FR to identify fraud. This information included staffing, core functions, probe image sources, daily review practices, priorities, general workflow, and baseline statistics.

After interstate collaboration began, each participating SDLA was asked to record information regarding their activities, workloads, and fraud cases. Because the four states began sharing information at different dates, each state provided this information for a sample period during implementation. Moreover, the information provided by the states was at different levels of completeness.

To supplement the self-reported information and provide a frame of reference, each state also provided standard "external" reports automatically generated by the FR system.

The research team also participated in two major project-related events. In June 2016, IDEMIA sponsored a Midwest Multi-State CDL Screening Summit to discuss the CDL applicant screening process. The overarching goal was to minimize the changes that the project might impose on existing agency procedures and initially estimate the potential changes in workload.

In July 2017, the four participating states organized a Multi-State Facial Recognition LEAN event to develop a standard approach for sharing information across all states, establish a business practice to minimize delays in investigation and license issuance, and develop a working memorandum of understanding (MOU) for a multi-state information sharing and investigation process.

Key Findings

- All participating states found the ability to check applicants against other states' databases to be the greatest success of the project. States are now capable of detecting fraudulent applications across state lines.
- Through interagency data sharing, multiple clerical errors have been corrected, and both possible and confirmed cases of CDL fraud have been identified.
- The communication and cooperation among states in identifying fraudulent applications uniformly and securely was also found to be a success.
- The image databases against which applicant photos were checked naturally became larger, leading to the identification of additional potential fraud cases and thus increased workloads. Lack of staffing was consistently considered the biggest challenge.
- All participating states reported increased workloads. Iowa, Illinois, and Nebraska reported that their workloads increased slightly, while South Dakota reported that its workload increased moderately.
- In addition to working a greater number of cases, all states spent time and effort on communication and information exchange.
- In addition to the costs of staff time, additional project costs included initial investment in an FR system, system maintenance and upgrades, and the computational and communications infrastructure to support both FR and cross-jurisdictional data sharing.
- Although communication and cooperation among the four states was successful, developing uniform processes and effective communication practices during information exchange was considered challenging.
- Iowa and Nebraska reported no changes in their internal workflows, while Illinois and South Dakota changed their workflows to prioritize external leads.

Conclusions

- The Midwest Cross-Jurisdictional Image Verification project demonstrated that four SDLAs can successfully communicate and exchange data to systematically identify possible CDL fraud involving multiple agencies.
- The project demonstrated the importance of interagency cooperation and agencies' dedication to the effort. Without the commitment of all agencies involved, the technological benefits of cross-jurisdictional FR cannot be realized.
- Agency staff were also critical to the project's success. The most extensive staffing issue is the increased burden on staff to clear daily leads and address possible cases of fraud. This increased workload should be considered when expanding cross-jurisdictional efforts to more agencies.
- Even if no fraud had been discovered during the project, an implicit benefit of the collaboration may exist in confirming no cases of fraud for the well over 100,000 CDL applicants screened during the project.

Implementation Readiness and Benefits

The cross-jurisdictional project was implemented successfully and can be expanded to include other states or used as a model for other interstate collaboration efforts.

The benefits of cross-jurisdictional collaboration include the value associated with correcting clerical errors and the impact of identifying and preventing different types of fraud.

The FR system used by the participating states is scalable in terms of the number of probe images and participating agencies. The system is also designed to work with systems from other vendors, which could facilitate the inclusion of agencies not using the same product as the four SDLAs involved in this project.

With a larger image database containing images from additional states, the FR system would become more robust in terms of identifying fraudulent applications, and records would become more accurate through correction of clerical errors.

However, if additional staffing resources are not allocated, increasing the number of available comparison images with data from additional states would likely increase workloads and possibly delay response times.

INTRODUCTION

Overview

In fiscal year 2015, the Iowa Department of Transportation (DOT) Motor Vehicle Division (MVD) applied for a Federal Motor Carrier Safety Administration (FMCSA) Commercial Driver's License (CDL) Program Implementation Grant for the Midwest Cross-Jurisdictional Image Verification project. The ultimate objective of this project was to reduce the frequency and severity of commercial motor vehicle (CMV) crashes. This would be accomplished by preventing the issuance of CDL privileges and credentials when possible fraud is detected and minimizing the potential for commercial drivers whose licenses have been suspended/revoked in one state from illegally obtaining a valid CDL in another participating state. Additionally, the project aimed to establish a replicable model that could be used by other jurisdictions and expanded to other state driver's license agencies (SDLAs) for nationwide, multi-jurisdictional fraud detection and prevention.

The Iowa DOT served as the lead agency for the project, with the original partner states being Illinois and Nebraska. The project was later expanded to include South Dakota.

Prior to project initiation, all participating SDLAs used IDEMIA's (formerly MorphoTrust's) Biometric Identification (BI) platform for facial recognition (FR). However, the versions used were not consistent among agencies, and all SDLAs had to be upgraded to BI version 4.10. BI enabled each state to identify, flag, and prevent potential driver's license fraud within its respective jurisdiction; however, no interstate collaboration existed to cross-check and detect CDL identity fraud that occurred across state lines. Therefore, the base BI platform was extended to enable the communication and exchange of data with cooperating entities, facilitating the cross-jurisdictional effort.

Objective

In support of the Midwest Cross-Jurisdictional Image Verification project, the research team was responsible for independently documenting the existing resources and workflows of participating SDLAs and subsequent project-related efforts and impacts. The team was also responsible for evaluating the level of cross-jurisdictional fraud uncovered and, if possible, any impacts of this fraud on highway safety.

While the FR system is critical to the project, through identification of possible fraud both within and across agencies, the functional specifications, solution architecture, and information technology (IT) considerations of IDEMIA's Biometric Identification platform are not covered in this report. This report provides an overview of the cross-jurisdictional process as a whole as well as participant SDLA experiences and project outcomes.

BACKGROUND

Use of Facial Recognition by SDLAs

Facial recognition is a biometric software application that can assist with identifying a specific individual in a digital image by analyzing and comparing patterns. The FR software consists of an array of algorithms that measure various features of the face, facilitating recognition of the same or a similar individual. Every face has numerous distinguishable features that enable electronic matching, including the following:

- Distance between the eyes
- Length and/or width of the nose
- Depth of the eye sockets
- Shape of the cheekbones
- Length of the jaw line

Within the United States, Illinois began using FR for driver's license applications in 1999. Since then, FR has become widely used by state departments of motor vehicles (DMVs) in the US. In 2015, the American Association of Motor Vehicle Administrators (AAMVA) reported that over 40 states utilize FR. This number may have since increased.

The three primary areas in which FR assists DMVs are in identifying fraud and theft, flagging and eliminating internal fraud, and clearing and correcting clerical errors. Other potential benefits of FR include the following:

- Improving highway safety by eliminating potential high-risk drivers
- Reducing the benefit of financial fraud by preventing a fraudster from obtaining an identification (ID) under a different name
- Assisting disaster response by identifying deceased individuals, homeless or lost individuals (i.e., those with memory challenges), and unconscious crash victims
- Assisting law enforcement agencies in criminal investigations (AAMVA 2015)

New York State Facial Recognition Program: Traffic Safety Implications

From February 2010 to January 2013, the New York State (NYS) DMV conducted a study to identify the possible safety implications of FR. Upon comparing more than 20 million intrastate images during the three-year period, more than 12,000 cases were identified as possible fraud.

While it was not within the project scope to identify specific cases of fraud, a total of 12,338 of the possible fraud records had complete information available for analysis of driver history, including license status and involvement in a crash and/or conviction of a traffic-related offense. The possible fraud cases were then compared to all licensed drivers in NYS (approximately 11.3

million). Findings are presented in Table 1. These findings clearly suggest that the possible fraud cases involved higher risk drivers. (NYS DMV 2013).

Table 1. Comparison of possible fraud cases and all NYS licensed drivers

	Possible Fraud Records	All Licensed Drivers (NYS)
No valid license	24%	-
Involved in a crash	67%	43%
Conviction of impaired driving	10%	2%
Conviction of cell phone violation	27%	9%
Conviction of unlicensed operation	49%	8%
Conviction of seat belt violation	57%	21%
Accumulated six or more points on their license within 18 months [after November 18, 2004]	34%	11%

Source: NYS DMV 2013

Interstate Fraud Prevention Initiative

The Interstate Fraud Prevention Initiative was the first example of a successful cross-jurisdictional partnership, involving the New Jersey Motor Vehicle Commission and New York State Department of Motor Vehicles. The objective of this pilot project was to use interstate FR images and associated data to identify individuals who held CDLs in more than one jurisdiction. The pilot effort was successful in discovering both identity-related crimes and fraudulent CDL procurements, often involving suspensions in one state. Moreover, this effort proved that cross-jurisdictional FR efforts were feasible and could be successful (AAMVA 2015)

Facial Recognition and Fraud Experience in Cross-Jurisdictional States

Overview

The Midwest Cross-Jurisdictional Image Verification project proposal documented the critical role of FR in fraud detection within the cross-jurisdictional states. For example, Illinois, one of the first states to adopt facial recognition technology, found more than 5,000 cases of identity fraud from 1997 to 2007. Of those cases, 4,600 involved people with one fraudulent identification and 600 cases involved people with two or more fraudulent identifications. Since 2009, image verification has matched 334 CDL drivers to multiple identities in Illinois.

All participating states have had specific experiences where individuals have held multiple valid credentials in multiple states. In most cases, fraudulent use was discovered by requesting another state’s DMV to check its image databases for duplicate images. Specific examples of the kinds of fraud detected using facial recognition include the following:

- An escaped fugitive for over 40 years from North Carolina tried to register a vehicle and apply for an Iowa driver's license using a different name. His application was flagged, and the individual was apprehended and returned to North Carolina to continue serving his sentence.
- An image from the Iowa Department of Public Safety Sex Offender Registry was sent to the Iowa DOT MVD for positive identification.
- An individual using a stolen identity from Texas to secure an Iowa driver's license had his application flagged. After further research by Iowa investigators, the individual was interviewed and arrested, and multiple charges were issued, including identity theft.
- An individual was using at least three different identities in Iowa and Missouri to obtain valid driver credentials, while using other identities in Nebraska for employment.
- Six different individuals were discovered using the same identity in the states of Nebraska, Missouri, Kansas, Arkansas, Florida, and California.
- Four different individuals obtained driver credentials in the states of Nebraska, Missouri, North Carolina, and South Carolina using the identity of an Army service member who was serving on active duty in Iraq.
- An individual from Fort Dodge, Iowa, used a stolen identity to obtain U.S. Government benefits in the amount of \$74,000. When the driver's license (in the person's own name) was suspended due to vision problems, the person obtained a CDL using the false identity. The fraud was detected when the person attempted to renew the Iowa ID using his true identity.
- An individual attempted to secure an Iowa non-driver ID using a false identity. The subject had previously obtained an Iowa driver's license using a different identity. Further investigation revealed that the individual had used a Tennessee driver's license as part of a false identity in order to obtain the Iowa driver's license.
- An Illinois resident who had seven false identities and purchased high-end automobiles to operate an auto-theft ring was identified and apprehended.

State of the Practice Prior to Cross-Jurisdictional Implementation

During the early stages of the cross-jurisdictional project, each participating state provided background information regarding the FR state of the practice within its driver's licensing agency. This included staffing, core function, probe image sources, daily review, priorities, general workflow, and baseline statistics. Later in this report, additional technical details regarding each state's FR program are presented. Such details are more targeted towards project facilitation, such as intelligence sharing.

Each state uses various probe image databases in order to detect fraud and has established procedures to investigate possible fraud cases. In general, possible image matches generate leads. These leads may be cleared through an initial review process. If not cleared, a case is generated and assigned to an investigator. Through the investigation process, an attempt is made to resolve each case, which may or may not include identifying fraud.

Each state addresses a different number of leads annually. The number of leads is directly impacted by the number of candidates processed, which may vary throughout the year and certainly varies among states. Additionally, the biometric thresholds employed by each state may differ, impacting the possible number of resulting leads.

The state of the practice for each cross-jurisdiction state is summarized within this section. The detailed responses from each state are included in Appendix A.

Iowa

The Bureau of Investigation and Identity Protection at the Iowa DOT investigates criminal cases involving title and registration, motor vehicle dealer compliance, Iowa driver's licenses, motor vehicle fees for new registrations, odometer compliance, and National Motor Vehicle Title Information System (NMVTIS) hits. These criminal cases may result in an arrest and the filing of criminal charges. Additional bureau responsibilities include administrative duties such as vehicle identification number (VIN) corrections, assignment of Iowa-specific VINs for specially constructed and reconstructed vehicles, odometer corrections, bond title inspections, dealer onsite physical inspections (prior to issuing a dealer license), and problem driver pointer system (PDPS) approvals. The unit staff is comprised of a director, a deputy director, an investigative assistant, bureau interns, and 17 sworn investigators.

FR was implemented in 2007. The sources of probe images include candidate ID and driver's license images dating to 1995–1996, driver's license cards, applications for commercial driver's licenses and renewals, kiosk renewal applications (since 2014), sex offender registry photos (since 2015), and county booking photos (since 2015).

One full-time staff and one part-time bureau intern process daily leads (i.e., matches between probe images and candidate images) generated by the FR software. If there is a valid match, the case is flagged for investigation. Data errors, identical twins, and booking photo errors are corrected. When charges are beyond the statute of limitations, which is typically three years, the bureau mails a standard letter to the applicant who is believed to have made a false application. The applicant is asked to call the appropriate investigator to discuss his/her application.

The order of priority for investigation is as follows: suspects that are wanted for known crimes, CDL applicants, new driver's license/ID applicants, renewed license/ID applicants, and duplicate license/ID applicants. The bureau processes about 2,000 leads per week from December to May and about 3,700 leads per week from June to August.

Illinois

In 1997, the use of an FR system was included as an option in the contract for the state's driver's license issuance system. In 1999, FR was implemented to identify fraudulent activity relating to driver's license and ID card issuance.

The Fraudulent Review Unit of the Illinois Secretary of State is responsible for reviewing all records where it is suspected that fraud has been committed to obtain an Illinois driver's license or identification card. Suspected fraud can be identified as a result of a match made by the FR software or through the presentation of altered or false documents to facility employees while applying for a driver's license or ID card. The unit is also responsible for working cases in the FR queues. The unit is comprised of an Administrative Assistant III, an Executive I, a Secretary, two contractual employees, and 11 Motor Vehicle Technician IIs.

The sources of probe images include the state's driver's license and ID card database, photos from renewals by mail, and uploaded requests from local, state, and national law enforcement offices.

Leads are processed by 11 full-time motor vehicle technicians located within the Fraud Review Unit and 14 full-time employees located outside of the unit. The process has three levels. Level 1 involves a quick scan for cases where further review can be skipped, cases that can be linked to other cases, possible fraud, process errors, and cases where no fraud can be identified. The outside staff work the leads at this level. Level 2 involves further investigation of possible fraud cases, which are sent to a fraud unit technician. If fraud is confirmed at this level, the record is sent to Level 3. An Illinois Secretary of State Police Memo is created and forwarded to the appropriate district for an investigator to review the case. The investigator meets with the applicant and determines whether any criminal charges are warranted. A report is then sent back to the Fraud Review Unit of the findings. If an administrative sanction is warranted, then a suspension or revocation is applied to the applicant's driving record for a period of one year. Although the Fraud Review Unit processes leads in order of date, technicians are required to work on certain assignments for the week.

Nebraska

FR was deployed in 2009. The Fraud Unit at the Nebraska Department of Motor Vehicles investigates a variety of criminal and administrative cases pertaining to driver's licenses, ID cards, and motor vehicle-related crimes and criminal statutes. Investigators provide training to DMV staff relating to document fraud and identity theft. They review DMV images in the FR system and identify subjects who attempt to use multiple identities for fraudulent purposes. The unit consists of a director, a deputy director, an administrator, a unit chief, three sworn investigators, and three research analysts.

The sources of probe images include candidate ID/driver's license images (since 2003), ID/driver's license cards (since 2003), applications for CDL renewals/duplicates/licenses (since 2003), jail images (since 2001), and county booking photos.

Three full-time employees within the unit process the leads generated by the FR system. If a match is found, it is sent for further research. The analyst confirms the true identity of the applicant and researches whether additional crimes have been committed. Once the analyst finishes with his/her research, the case file is turned over to the unit chief with the analyst's recommendations. The unit chief reviews the case, then assigns it to a DMV fraud investigator, who either refers it to another law enforcement agency or closes the case. The license/ID card is not cleared until the case is closed. The case may be closed due to expired statute of limitations, inability to identify the suspect, or the county attorney's office declining to prosecute. The suspect must contact the court and move any criminal convictions to his/her true identity before the license is cleared for issuance. Data errors, identical twins, and booking photo errors are corrected during this process.

Investigative priority is as follows: suspects that are wanted for known crimes, CDL applicants, new driver's license/ID applicants, renewed license/ID applicants, and duplicate license/ID applicants. The unit processes about 2,500 leads per week throughout a given year.

South Dakota

The South Dakota Department of Public Safety's Driver Licensing Program is comprised of a director, an investigator, and an examiner to process and analyze the results of the state's FR program. The core function of FR in South Dakota is to detect fraudulent applications and identify and eliminate criminal activity based on photos sent by the South Dakota Fusion Center.

The sources of probe images include candidate ID/driver's license images dating back to 2000, ID/driver's license cards, applications for commercial driver's licenses/duplicates/renewals, and uploaded requests from the South Dakota Fusion Center and South Dakota Highway Patrol.

The examiner processes the daily leads generated by the FR software, which matches probe images to candidate images. If there is a match for possible fraud (e.g., the probe image and candidate image are listed under different names), a file is created and sent to the Fusion Center in Sioux Falls for further investigation. Further investigation includes the collection of intelligence regarding false applications and archived photos of the suspect and, if applicable, victim(s). If a data error is confirmed by the investigator, it is corrected before the case is entered into South Dakota's Public Notices repository.

The order of priority for investigation is as follows: suspects that are wanted for known crimes, CDL applicants, new driver's license/ID applicants, renewed license/ID applicants, and duplicate license/ID applicants.

The unit processed about 750 leads per week from December 2015 to May 2017.

IMPLEMENTATION

Midwest Multi-State CDL Screening Summit

A critical element in the success of the Midwest Cross-Jurisdictional Image Verification project was the functionality of the FR system. Without the capabilities to identify possible fraud and communicate among agencies, the project would have been a non-starter. Therefore, IDEMIA sponsored a summit early in the project to focus on the FR component. This section provides an overview of the Midwest Multi-State CDL Screening Summit that was held in June 2016.

Participants in the summit included the three original state SDLAs (Iowa, Illinois, and Nebraska), the IDEMIA project team, and the Iowa State University (ISU) research team. Key aspects of the summit included program delivery, program governance, screening architecture and operation, workloads, and requirements. A primary goal of discussing the CDL applicant screening process was to minimize the changes that the application of FR might impose on existing agency procedures. Additionally, six categories of requirements, specifically related to multi-state cooperation, were identified: leads, review and adjudication of results, interactive tools, reporting, auditing, and purging/archiving. IDEMIA demonstrated how each of these requirements are implemented within the FR system.

Following the summit, IDEMIA conducted a workload analysis based on existing CDL applicant frequencies within each participating state. Based on estimates that 10% of leads would involve multi-state investigation and 10 minutes would be required per case, the daily increase in work hours was estimated to be 8, 6, 3, and 1.3 for Iowa, Illinois, Nebraska, and South Dakota, respectively. Table 2 presents the comprehensive workload analysis. This represents only an estimate, and both self-reported and report-generated frequencies and times are presented in the Outcomes chapter of this report.

Table 2. Preliminary CDL workload analysis

	Iowa	Illinois	Nebraska	South Dakota
Total CDL Records	296,576	453,800	110,450	70,316
Revoked/Suspended CDL Records	6,092	26,675	6,172	1,002
Valid CDL Records	190,890	348,049	92,571	53,333
Daily CDL Images	492	360	181	75 (high est.)
Annual Issuance	944,000	2,800,000	515,000	201,000
Daily Issuance Screening Identifications	3,932	11,667	2,146	838
External Multi-State Daily Identifications	616	748	927	1,033
Multi-State Leads – 10%	49	36	18	8
Daily Multi-State Hours (10 min/case)	8	6	3	1.3

LEAN Design Event

As discussed in the previous chapter, each state has somewhat different practices, workloads, and staffing resources regarding FR-generated leads. Additionally, the cross-jurisdictional project would require new institutional-level interagency coordination and cooperation. Therefore, a two-day LEAN design event was conducted involving the four participant SDLAs. This section presents an overview of, and material shared during and after, the Multi-State Facial Recognition LEAN event held in July 2017.

A primary emphasis of any LEAN design event is outlining a methodology to create a new service, product, or process. Such events are applicable to any project that needs a significant amount of new design, like the cross-jurisdictional effort. LEAN events also place a strong emphasis on capturing and understanding customer and organization needs. The cross-jurisdictional project involves both many customers (CDL applicants in participant states) and organizations, e.g., participant SDLAs.

Three primary project objectives were identified during the LEAN design event:

- Developing a standard approach for sharing information across all four states that will include notification, coordination, and resolution
- Establishing a business practice that works best for all four states that will help minimize the delay of investigation and issuances
- Establishing a working model memorandum of understanding (MOU) for a multi-state information sharing and investigation process

The identification of these objectives was accomplished, in part, by participants sharing information on current SDLA practices, discussing and understanding the critical issues, discussing project implementation steps, and establishing communication channels/protocols to be used during integration. For this report, the questions posed and summaries of the responses are organized into eight tables (Tables 3 through 10) pertaining to information sharing, supporting documents (three tables), statute of limitations, driving records (two tables), and database access. While current SDLA practices are also outlined in the previous chapter of this report, the practices presented in Tables 3 through 10, such as intelligence sharing, are more targeted toward project facilitation.

Table 3. Information sharing

	Currently, what is your secure means of sharing information between other states?	Do you have a Mid-States Organized Crime Information Center (MOCIC) RISS email?
Iowa	MOCIC RISS email	Yes
Illinois	USPS & password protected email	Yes
Nebraska	Password protected doc via email	Yes
South Dakota	Voltage secure email system	No

Table 4. Supporting documents, Part 1

	What office within your state agency is the main repository for supporting documents (customer records, vehicle records, applications, and photos)?	How is a formal request for information made?
Iowa	Driving Records and Customer Records: Driver & Identification Services (DIS), Electronic Record Management System (ERMS), and Archon Technologies System (ARTS)	Via email and sometimes via phone call.
Illinois	The Driver Services Department	Fax, email, or USPS indicating why the information is being requested, and how it is being used.
Nebraska	Driver and Vehicle Records Division	Email request including case number and criminal predicate.
South Dakota	The South Dakota Department of Public Safety, Driver Licensing Program	Through a secure email that includes the name, DOB, and DL# of the driver.

Table 5. Supporting documents, Part 2

	What are the DPPA requirements?	Is a request for information from a law enforcement agency treated differently than that from a DMV (sworn vs. civilian)
Iowa	Yes. 1 DPPA per agency on a 2-year renewal	No
Illinois	Depends	Yes
Nebraska	None	No
South Dakota	None	Yes. If the law enforcement agency is separate from the SDLA.

Table 6. Supporting documents, Part 3

	Does your agency maintain a wage database, and is it available for investigative intel? If not your agency, who?	Do you routinely run a criminal history for your suspects?
Iowa	No. Iowa Workforce Development	Yes
Illinois	No	No
Nebraska	No. Nebraska Dept. of Labor	Yes
South Dakota	No. South Dakota Dept. of Labor	No

Table 7. Statute of limitations

What is your state’s statute of limitations regarding identity theft and DL fraud charges?	
Iowa	3 years from application
Illinois	For taking withdrawal sanctions (suspension, revocation, cancellation, etc.) against a DL or ID card record, there is no statute of limitations. For misdemeanor charges relative to ID theft and DL fraud the statute of limitations is 18 months. For felony charges relative to ID theft and DL fraud the statute of limitations is 3 years.
Nebraska	18 months to 3 years
South Dakota	General criminal statute of limitations is 7 years (SDCL 23A-42-2), but it would depend on the specific type and severity of the crime.

Table 8. Driving record, Part 1

	Once an investigation is complete, how is the driving record cleared up in your state?	What’s your process for vacating of charges, collecting unpaid fines and satisfying outstanding violations?
Iowa	Once the report has been reviewed and approved by the Director, the report gets sent to our records management Administrative Assistant II.	If there was a false app and they are coming in under their true identity today and there is a conviction, the investigator must get a motion to vacate from the clerk of court. If there is any other action that needs done, it can be removed based on the investigator’s report.
Illinois	The suspension or revocation is terminated when the sanction period is complete, unless it has been extended for some reason, and the person is required to pay a reinstatement fee.	Handled through the court system.
Nebraska	The record is marked within the DMV listing the previous matching record & case number. The fraudulent images are deleted from the victim’s DMV record. The license/ID is cleared for renewal	If the case is closed, the record is marked within the DMV listing the previous matching license and case number. The license/ID is cleared for renewal. The courts handle unpaid fines, and most likely will issue a warrant or suspend the driving record for failure to comply. If the suspect accumulated convictions as the victim and are listed on the victim’s driving record, the suspect must have the convictions moved to their true identity before a license/ID will be issued.
South Dakota	Either through a receipt of a law enforcement report or an updated court record.	Handled through the court system.

Table 9. Driving record, Part 2

	Should your state require an investigation, who would need a copy of the investigation report?	How do you prefer to receive the report?
Iowa	-	Secure email
Illinois	-	Secure email
Nebraska	-	Secure email
South Dakota	-	Secure email

Table 10. Database access

	Do all participating states have access to Nebraska Criminal Justice Information System (NCJIS)?	Do all participating states, other than Nebraska, have something similar to NCJIS?
Iowa	Yes	No
Illinois	No	Yes. Illinois Criminal Justice Information Authority
Nebraska	Yes	N/A
South Dakota	No	Access to National Law Enforcement Communication System

Addressing the information provided in these tables was critical to establishing the institutional framework for the cross-jurisdictional program. These tables may also serve as a guide for the types of information necessary for other agencies interested in participating in this program or initiating a similar program. While the SDLA-specific details may not be directly applicable to efforts involving other agencies, the responses convey how individual practices may differ and must be addressed when implementing a cross-jurisdictional program. For privacy purposes, not all responses are presented, for example, the responses to “Who is the point of contact to request these documents?” and “Should your state require an investigation, who would need a copy of the investigation report?”

The four SDLAs identified the current state of the process (at the time of the LEAN design event) as well as three future goals for the process. The current state of the process included a standard approach initiated immediately by all states after full launch of the FR system, channels for timely and accurate communication between states that will ensure no additional delays in processing, and no additional unnecessary impact to innocent applicants due to implementation of the new system. The latter was the most customer-focused aspect of the process.

The three future goals for the process that were defined were closely tied to the current state of the process and addressed implementation, customer focus, and measurement. Specifically, all four SDLAs would fully implement the cross-jurisdiction FR system after testing, a 48-hour response time was established for interstate communication, and measurements of workload and effectiveness were to be determined and defined. The future state of the process, after the implementation of the cross-jurisdiction FR program, is presented in Figure 1.

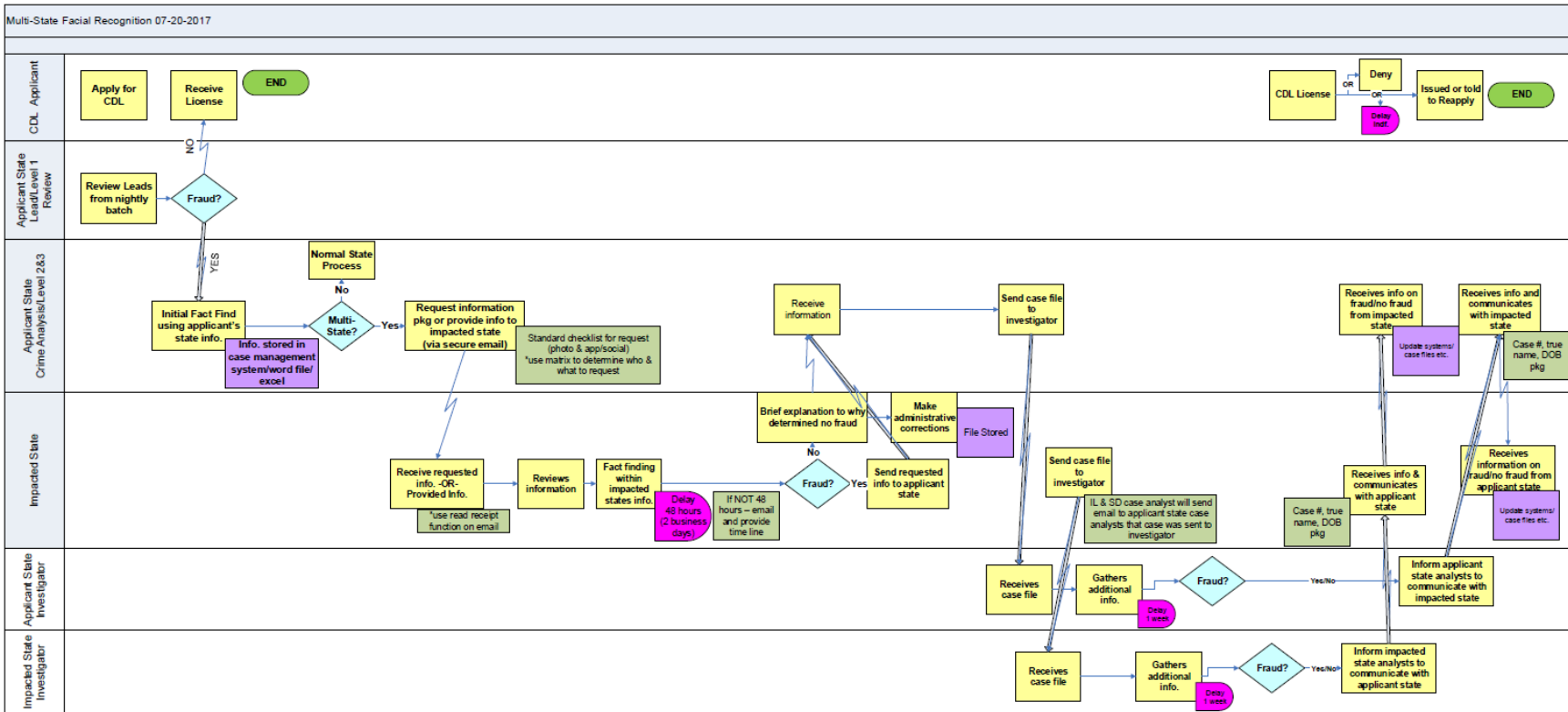


Figure 1. Map of the future state of the process

The process resulting from the event includes six levels and the associated relationships and workflows for each. The levels are as follows:

1. CDL applicant
2. Applicant state lead (Level 1 review)
3. Applicant state crime analysis (Levels 2 and 3)
4. Impacted state
5. Applicant state investigator
6. Impacted state investigator

Regarding the design of the future state of the process, it is important to note that the FR component is essentially only represented by a single box, i.e., generated nightly leads. This occurs at the second level, Applicant state lead. Most activity will likely be limited to the first two levels, CDL applicant and Applicant state lead. However, to successfully implement a cross-jurisdictional program to identify and prevent CDL fraud, it was necessary to map the entire workflow, much of which directly pertains to the tabular summaries presented above.

Lastly, meeting participants identified project strengths, weaknesses, opportunities, and challenges/threats. Project strengths were identified as participating SDLAs having the same demographics, participating states willing to work together to make the project successful, and decreasing fraud. Weaknesses included SDLAs' reliance on each other without a single SDLA having control, budget constraints, and the uncertainty of how processing would work between SDLAs. Overall, SDLA cooperation and coordination were viewed as both a strength and a weakness of the project.

Several project-related opportunities were identified, including the potential for expansion (to other SDLAs), increased identity security, and the availability of additional data for use by participating SDLAs. Major challenges and threats were related to system failure, the inability of SDLAs to fulfill the agreement due to high workloads, and the possibility of more restrictive FR-related legislation.

Daily Operation Overview

As noted above, a critical element in the success of the Midwest Cross-Jurisdictional Image Verification project was the functionality of the FR system. At project onset, as well as throughout the project, IDEMIA and the SDLAs' IT staff coordinated on FR-related matters, including system updates, communication, operations, and testing. The time required for system updates within each SDLA was dependent, in part, on the software version at the time of project initiation. Older versions required additional time for upgrades.

The Iowa DOT estimates that about 60 hours of internal IT support was devoted to the project prior to implementation. A limited amount of IT support was required by the agency after implementation. However, this amount of effort may not be representative of all agencies,

because Iowa benefited from having an IT staff person dedicated to FR. Additional time may be required for larger agencies and/or agencies without IT staff dedicated to FR.

Image sharing among states began incrementally. Iowa and Nebraska began sharing images in July 2018, and Nebraska and South Dakota began sharing images in October 2018. The system was fully implemented, and all states began sharing images, in December 2018. Table 11 presents the “go live” dates for each state with respect to each other.

Table 11. State “go live” dates

	Iowa	Nebraska	Illinois	South Dakota
Iowa	-	7/17/2018	12/4/2018	12/12/2018
Nebraska	7/17/2018	-	12/12/2018	10/11/2018
Illinois	12/4/2018	12/12/2018	-	12/12/2018
South Dakota	12/12/2018	10/11/2018	12/12/2018	-

Each evening, the FR system shared daily CDL applicants among agencies and generated leads for review. Agencies then followed the process outlined in Figure 1, beginning with Applicant state lead (Level 1 review). Generally, but not always, the process ended at this stage, as applicants were cleared upon further review. All agencies were responsible for addressing both intrastate leads (all types) and multi-state CDL leads.

As part of the research effort, each agency was also requested to document the following details regarding their activities, workload, and fraud cases:

- Date
- Day of week
- Total number of BI leads
- Total number of records in cases report
- Total number of CDL applicants (external)
- Total number of data errors identified. This includes both intrastate and interstate clerical errors.
- Total time (hours and minutes) to work leads, excluding intelligence gathering. This may include reviewing past photos, contacting another office for record verification, and reviewing whether an applicant came through multiple times in the same day.
- Total number of local records requiring a record search. Specifically, this is the number of times a user must cross-reference information in the database. For example, a person might have a booking image, and the date of birth and last name of the applicant do not match the information associated with the booking photo, or an applicant might match an older driver’s license in a participating state, and it must be verified that the license in that state has been surrendered.
- Total number of minutes to research local records. This includes the time required to cross-reference for aliases or check whether an individual ever surrendered a license in another participating state.

- Total number of minutes to research external records. This represents the amount of time required to contact another participating state regarding research on an applicant.
- Total number of fraud occurrences identified. This is the total number of applicants that were sent to investigation.
- Motive for CDL fraud. This represents the conclusion of any cases.
- Internet browser used. The browser used can impact the amount of time required while working within the FR system. Given the additional workload of the multi-state effort, this information is beneficial for identifying the best performing browser(s).
- Number of users clearing leads
- State “go live” date

Recording this information did require additional time and effort from each agency beyond their responsibilities of clearing both intrastate and interstate leads. As a result, some of the information was incomplete, and the practice was not conducted throughout the entire duration of the project. To supplement this information, each state also generated automated, standard “external” reports within the FR system. While these reports provided quantifiable data, they lacked details regarding the time required to address leads. These reports, representing different time periods, as well as the information recorded by each state, are discussed in the Outcomes chapter.

Lastly, bi-weekly meetings were held among SDLA staff, the IDEMIA project team, and the ISU research team to discuss implementation and data collection and analysis. Each SDLA and the IDEMIA project team addressed implementation-related issues as encountered.

OUTCOMES

As discussed in the previous chapter, each agency recorded details regarding their activities and workload. Because the “go live” date was not the same for every state, the information provided by each state represented a sample period during implementation for that state, and the information from different states may convey different levels of completeness, different levels of image sharing among participating states, and different time periods. All information is assumed to be accurate. However, as a frame of reference, a summary of information from the standard FR system reports is also presented.

State Workloads

Iowa

Iowa provided the most comprehensive self-reported data, allowing for two different time periods to be assessed: a period in which images were shared with Nebraska only and a period in which all states shared images (full implementation). Table 12 presents descriptive statistics for the period in which only Iowa and Nebraska were sharing images. Data were provided for a total of 82 days.

Table 12. Iowa self-reported workload – July 8, 2018 to December 3, 2018

	Total	Average (Daily)	Minimum (Daily)	Maximum (Daily)	Standard Deviation (Daily)
Leads	29,059	354.4	40	824	160.2
Records (Case Report)	27,337	346.0	38	856	150.0
External CDL Applicants	3,282	41.5	1	206	33.2
Local Data Errors	20	0.3	0	2	0.6
Hours Required to Work All Leads	145.9	1.8	0	7.5	1.3
Records Requiring Research (Local)	786	11.2	0	43	10.4
Minutes Required to Research Records (Local)	1,112	15.9	0	72	16.5
Minutes Required to Research Records (External)	174	2.6	0	19	4.1

Data for 82 total days

On average, Iowa spent 1.8 hours daily clearing leads. External records research represented about 14 percent of total records research, which is greater than the average proportion of external CDL applicants to total leads (0.11), and occurred on 40 percent of the days (33) on which any lead was reported. In general, the descriptive statistics also indicate that the workload varies from day to day.

Table 13 presents descriptive statistics for the period in which all states were sharing images. Data were provided for a total of 56 days.

Table 13. Iowa self-reported workload – December 4, 2018 to February 28, 2019

	Total	Average (Daily)	Minimum (Daily)	Maximum (Daily)	Standard Deviation (Daily)
Leads	19,595	349.9	17	863	178.3
Records (Case Report)	19,321	345.0	4	736	152.7
External CDL Applicants	3,315	59.2	0	333	43.3
Local Data Errors	49	0.9	0	6	1.2
Hours Required to Work All Leads	90.4	1.7	0	4	1.0
Records Requiring Research (Local)	433	8.0	0	25	6.0
Minutes Required to Research Records (Local)	552	10.2	0	39	7.8
Minutes Required to Research Records (External)	622	11.5	0	35	8.9

Data for 56 total days

On average, during this period Iowa spent 1.7 hours daily clearing external leads, which is slightly less than during the prior period. However, external records research increased to 53 percent (from 14 percent) of total records research, which, similar to the previous period, is greater than the average proportion of external CDL applicants. External records research also occurred on 84 percent of the days (47) on which any lead was reported. As with the prior time period, the descriptive statistics also indicate that the workload can vary from day to day.

The descriptive statistics presented in Table 12 and Table 13 may be compared to the self-reported pre-implementation workload estimates provided by Iowa in Table 14 and Table 15.

Table 14. Estimated Iowa pre-implementation daily leads

	Mon	Tues	Wed	Thurs	Fri	Average (Daily)
Dec–May and Sept–Nov	600	100	500	300	500	400
Jun–Aug	1,200	200	800	500	100	560

Table 15. Estimated Iowa pre-implementation hours required to clear daily leads

	Mon	Tues	Wed	Thurs	Fri	Average (Daily)
Dec–May and Sep–Nov	3	0.75	3	1.5	3	2.3
Jun–Aug	6	1	5	3	5.5	4.1

During the period of multi-state implementation, the average daily time required to clear leads was reported as 1.8 hours, compared to the estimated daily average before implementation of 2.3 hours.

It is important to consider that some inherent differences exist between these two sets of tables, as follows. Table 12 and Table 13 present detailed daily estimates of workload, i.e., by individual dates, while Table 14 and Table 15 represent broader estimates over a longer time period (multiple years). Additionally, workload variability is very apparent from the corresponding descriptive statistics of both sets of tables, e.g., the range of values and generally large standard deviations compared to the averages. Differences between the two sets of tables should be expected.

Table 14 and Table 15 also convey how workload varies by time of year. The average estimated time required to clear leads in the summer months is nearly twice that of other times of year.

Figure 2 presents the number of unique cases listed in the standard FR reports, both local (intrastate only) and external.

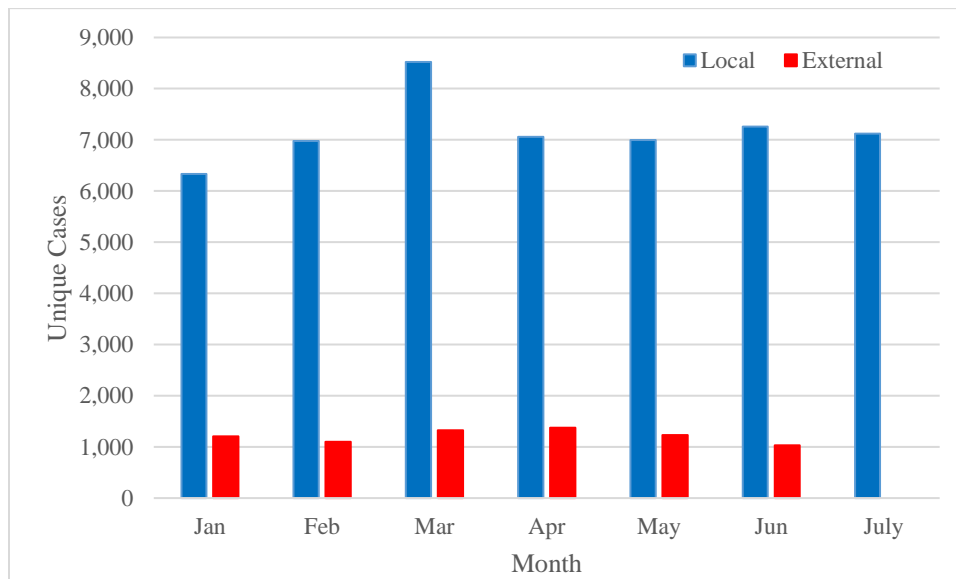


Figure 2. 2019 Iowa case reports: local and external

Local cases are presented for January through July 2019, and external cases are presented January through June 2019. These time periods represent full implementation. During these periods, the average number of local cases was about 7,200, but this number could fluctuate. The average number of external cases was about 1,200, which represents about 16 percent of all cases generated.

Table 16 simply presents a selected summary of the reported local case workflow, focusing on the cases with issues or potential issues.

Table 16. 2019 Iowa local case report: workflow type

Month	Confirmed Data Error	Criminal Activity	Lead	Possible Data Error	Research
Jan	17	4	110		
Feb	16	3	61		1
Mar	11	2	103		
Apr	38	1	78		1
May	2	1	167		4
Jun	2		174		1
July	3	1	144	1	4

Compared to the total number of cases presented in Figure 2, the percentage with issues is very small. However, the workload reflected by this set of cases does not account for the time required to clear leads for which no issues were ultimately found.

Nebraska

Nebraska provided self-reported data for 52 days during which images were shared with Iowa only. Table 17 presents descriptive statistics for a portion of this period.

Table 17. Nebraska self-reported workload – July 18, 2018 to September 28, 2018

	Total	Average (Daily)	Minimum (Daily)	Maximum (Daily)	Standard Deviation (Daily)
Leads	8,061	155.0	4	251	31.2
Records (Case Report)	3,578*	155.6	131	199	18.1
External CDL Applicants	400	7.7	3	12	2.5
Hours Required to Work All Leads	38**	1.8	1.3	2.5	0.2

* Beginning 8/28/2018 (23 total days)

** Beginning 8/30/2018 (21 total days)

Partial data, pertaining to case reports and time required to work leads, were provided for only 23 and 21 of the 52 days, respectively.

On average, Nebraska, like Iowa, spent 1.8 hours daily clearing leads. External CDL applicants represented a smaller proportion of total leads compared to Iowa, at 0.05. Also like Iowa, the descriptive statistics for Nebraska indicate that the workload varies from day to day.

The descriptive statistics presented in Table 17 may be compared to the self-reported pre-implementation workload estimates provided by Nebraska in Table 18.

Table 18. Estimated Nebraska pre-implementation daily leads

	Mon	Tues	Wed	Thurs	Fri	Average (Daily)
Daily Leads (number)	1,500	100	700	750	650	740
Time Required to Clear Daily Leads (hours)	7	0.75	4	4	3	3.75

While the pre-implementation data include higher numbers on average, they represent broader estimates over a greater time period. Table 17 presents very detailed estimates of workload, and, as mentioned previously, workload variability is very apparent from the corresponding descriptive statistics. This variability should also be considered in the pre-implementation estimates.

During the period of multi-state implementation, the average daily time required to clear leads was less than that reported in the pre-implementation estimates. As discussed above for Iowa, however, some inherent differences exist between these two tables, e.g., that workloads are estimated by individual dates in Table 17 but for an entire calendar year in Table 18. In addition, the data provided by Iowa in Table 15 demonstrate the significant seasonal impacts on workload. Lastly, workload variability is very apparent from the wide ranges of values in the corresponding descriptive statistics, so differences from day to day should be expected.

Figure 3 presents the total number of unique cases listed in the standard FR case reports for Nebraska.

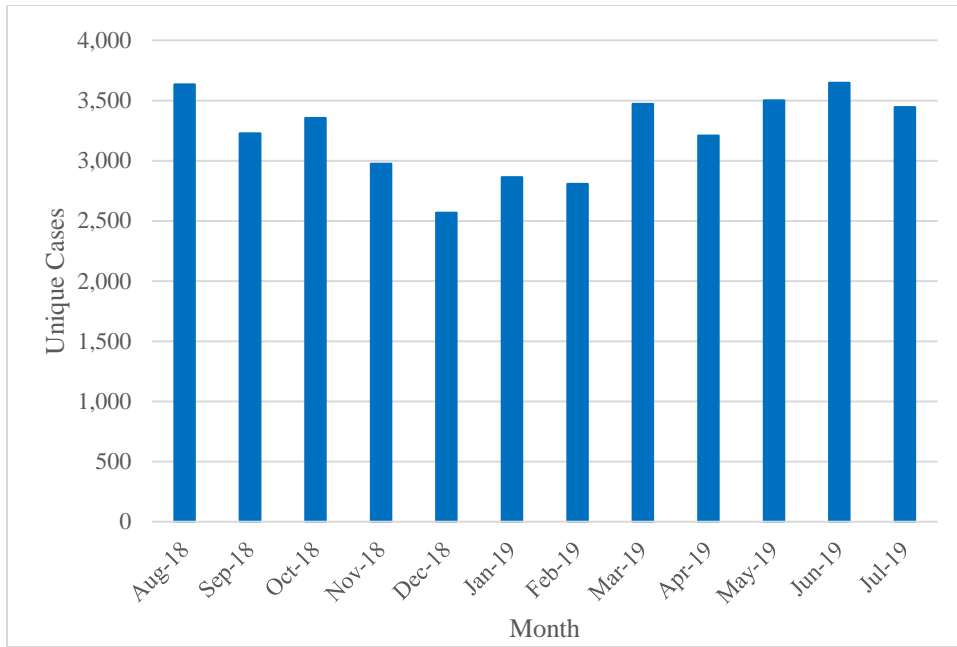


Figure 3. Nebraska case reports

Cases are presented beginning from the first full month following implementation with Iowa, i.e., August 2018, through July 2019. South Dakota became active in early October 2018, and Illinois became active in early December 2018.

The frequency of cases appears relatively stable at approximately 3,400 per month until November 2018, when a decline occurs to approximately 2,800 per month until March 2019. From March 2019 to July 2019, the number of unique cases again appears stable (about 3,500 per month). This may seem somewhat counterintuitive given the incorporation of additional state image databases into the FR system during this period; however, given the low percentage of external CDL applicants, the variability in the number of cases may be especially sensitive to the number of intrastate applications.

Illinois

Illinois provided self-reported data for 51 days during the project. Table 19 presents descriptive statistics for a portion of this period, which included one week of image sharing with Iowa only and the remaining time involving image sharing with all states. The descriptive statistics for the week when images were shared with Iowa only are limited to the reported number of leads and CDL applicants.

Table 19. Illinois self-reported workload – December 5, 2018 to February 22, 2019

	Total	Average (Daily)	Minimum (Daily)	Maximum (Daily)	Standard Deviation (Daily)
Leads	17,558	344.3	50	707	161.1
Hours Required to Work All Leads	75.0*	1.8	0.3	4.5	1.1
Minutes Required to Research Records (Local)	772*	18.8	0	38	9.3

* Beginning 12/17/2018

On average, Illinois, like both Iowa and Nebraska, spent 1.8 hours daily clearing leads. Also like Iowa, the descriptive statistics indicate that the workload varies from day to day.

Figure 4 presents the number of unique probe folios from Illinois’ automatically generated external adjudication report.

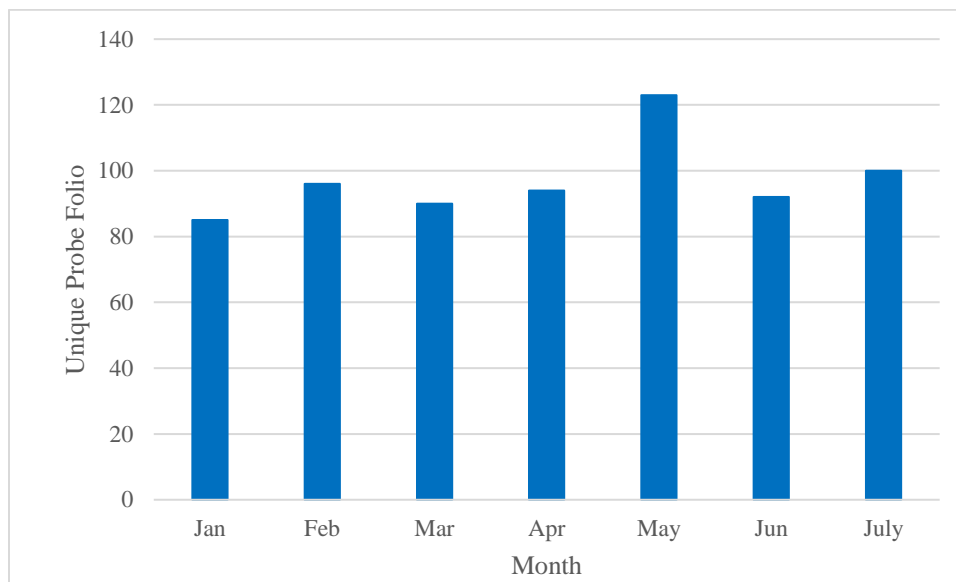


Figure 4. Unique probe folios per month from Illinois’ 2019 external adjudication report

The complete months of January through July 2019 are represented, corresponding to the period of full project implementation. The average number of external CDL leads during this period was about 97 per month, which is a very small percentage of the total Illinois leads. Specifically, Illinois addressed nearly 350 leads per day, compared to fewer than 100 external leads per month.

South Dakota

South Dakota provided self-reported data for two different time periods: a period in which images were shared with Nebraska only and a period in which all states shared images (full implementation). Table 20 presents descriptive statistics for the period in which only South Dakota and Nebraska were sharing images.

Table 20. South Dakota self-reported workload – October 5, 2018 to December 11, 2018

	Total	Average (Daily)	Minimum (Daily)	Maximum (Daily)	Standard Deviation (Daily)
Leads	7,970	215.4	68	458	97.3
Records (Case Report)	8,068	218.1	71	448	96.7
External CDL Applicants	195	5.7	1	13	2.9
Hours Required to Work All Leads	37.7*	1.6	0	3.25	1.0
Records Requiring Research (Local)	8*	0.3	0	2	0.6
Minutes Required to Research Records (Local)	104*	4.3	0	24	7.4

Data for 37 total days, except for * Beginning 11/1/2018

Data were provided for 37 total days; however, during the first two weeks of this time period, no data were provided for time required to work leads, number of local records requiring research, or time required to conduct local records research.

On average, South Dakota spent 1.6 hours daily clearing leads. This is slightly less than the time spent by the other participating states, which averaged 1.8 hours daily. External CDL applicants represented a smaller proportion of total leads compared to both Iowa and Nebraska, at 0.02. In general, the descriptive statistics also indicate that the workload varies from day to day.

Table 21 presents descriptive statistics for 48 days during full implementation.

Table 21. South Dakota self-reported workload – December 12, 2018 to February 26, 2019

	Total	Average (Daily)	Minimum (Daily)	Maximum (Daily)	Standard Deviation (Daily)
Leads	8,657	180.4	51	395	78.2
Records (Case Report)	8,815	183.6	55	396	78.1
External CDL Applicants	457	9.5	1	18	4.3
Hours Required to Work All Leads	59.1	1.2	0	3	0.8
Records Requiring Research (Local)	14	0.3	0	3	0.6
Minutes Required to Research Records (Local)	56	1.2	0	21	3.5
Minutes Required to Research Records (External)	28	-	0	10	-

Data for 48 total days

On average, the time spent clearing daily leads decreased from 1.6 hours to 1.2 hours daily. This may be due, in part, to some missing data. For example, record reviews were reported to have occurred on several days, but no total time to work leads was provided for those days. The proportion of external CDL applicants increased from 0.02 to 0.05. Nebraska’s proportion was also 0.05. About 33 percent of the total time reported for records research (both local and external) was attributed to external records.

The descriptive statistics also indicate that the workload varies from day to day, evidenced by the wide ranges of values and generally large standard deviations compared to the averages. Again, differences from day to day should be expected.

The descriptive statistics presented in Table 20 and Table 21 may be compared to the self-reported pre-implementation workload estimates provided by South Dakota in Table 22.

Table 22. Estimated South Dakota pre-implementation daily leads

	Mon	Tues	Wed	Thurs	Fri	Average (Daily)
Daily Leads (number)	210	90	150	160	160	154
Time Required to Clear Daily Leads (hours)	2	1	1.5	1.5	1.5	2

During the period of multi-state implementation, the average daily time required to clear leads was less than that in the pre-implementation estimates but still within the range of two hours on average. As discussed above for Iowa and Nebraska, however, some inherent differences exist between these two sets of tables, e.g., that workloads are estimated by individual dates in Table 20 and Table 21 but for an entire calendar year in Table 22. In addition, the data provided by Iowa in Table 15 demonstrated the significant seasonal impacts on workload. Lastly, variability

is very apparent from the corresponding descriptive statistics of both sets of tables, so differences from day to day should be expected.

Figure 5 presents the total number of unique cases for South Dakota according to the automated external case reports for November 2018 through May 2019.

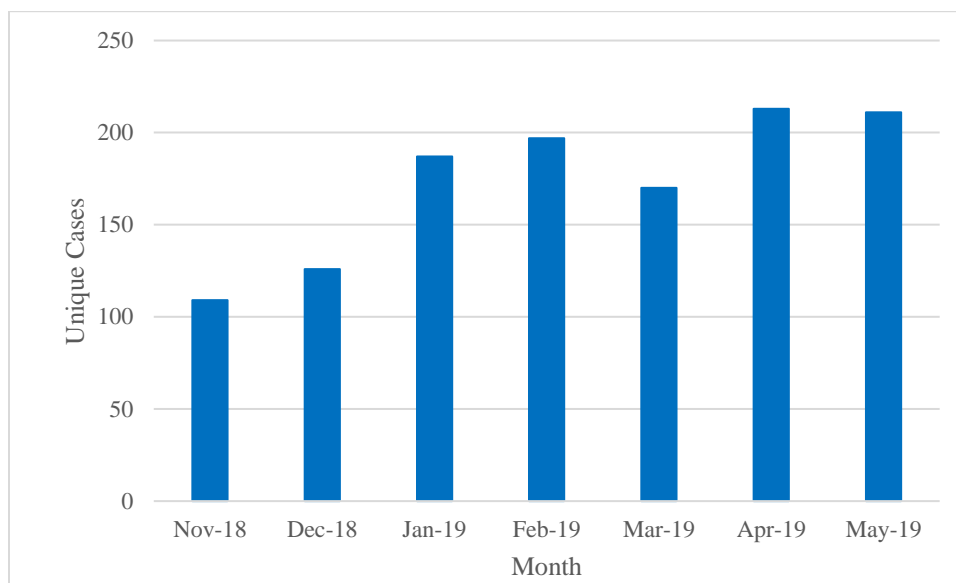


Figure 5. South Dakota external case reports

November 2018 represents the first full month of image sharing with Nebraska, while the remaining period represents image sharing among all agencies. An increase from November to December 2018 is apparent but not as marked as the increase from December 2018 to January 2019. This may be due, in part, to the fact that image sharing among all states did not begin until nearly two weeks into December 2018. The average number of monthly external cases beginning in January 2019 is about 196. Both April and May 2019, with an average of 212 external cases, are very consistent with this number.

State Experiences

Near the end of the project, a survey was sent to all participating states to obtain information regarding their experiences during project implementation. The survey results are summarized in the following sections. Original responses from each state are included in Appendix B.

Successes

All participating states found the ability to check and compare applicants against other states' databases to be the greatest success of the project. States are now capable of detecting fraudulent applications beyond state lines. The communication and cooperation among states in identifying fraudulent applications uniformly and securely was also found to be a success.

Challenges

Through the cross-jurisdictional effort, the comparison image databases naturally became larger, leading to increased workloads. Lack of staffing was consistently considered the biggest challenge. While the outcome of the project was ultimately considered a success, developing uniform processes and effective communication practices during information exchange was considered challenging. For some states, the external leads and cases were prioritized, requiring in a change in process for those states.

Change in Workload

All participating states reported increased workloads. Iowa, Illinois, and Nebraska believe their workloads increased slightly, while South Dakota reported that its workload increased moderately (in part due to its record keeping practices for the research effort). In addition to the larger, collective images databases, there was also an increased effort by all states to invest in communication and information exchange.

Change in Workflow

Iowa and Nebraska reported no changes in their internal workflows, i.e., how leads and cases are worked. The leads and cases in these states are worked in the same manner as that prior to implementation. Illinois and South Dakota have prioritized the external leads.

Potential Future Challenges: Project Continuation and Expansion

Continuing to increase the size of the image database and expanding the image database with data from additional states would likely increase workloads and possibly delay response times if additional resources are not allocated. Additional fraud-related issues may not yet have been encountered in this effort and would need to be addressed.

Potential Future Benefits: Project Continuation and Expansion

With a larger and expanding image database, the FR system would become more robust in identifying fraudulent applications. Records would also become more accurate through correction of clerical and other errors.

Future Project Improvements

The ability to view notes from other states, such as demographic information and issue date, on images would increase the speed of communication between states. Another possible improvement would be the ability to access the archived images of other states.

Fraud

Although full implementation began later than anticipated, the direct outcomes of the Midwest Cross-Jurisdictional Image Verification project have included identification of additional clerical errors, possible cases of fraud, and known fraud cases. For example, Iowa discovered four cases of clerical errors through cross-jurisdictional cooperation. Additionally, the project allowed two cases in Iowa to be flagged for further research into possible fraud. Illinois identified 31 possible fraud cases through cross-jurisdictional cooperation. Examples of fraud and alleged fraud cases discovered through the cross-jurisdictional project follow.

Four cross-jurisdictional fraud cases have been investigated and closed:

- Iowa and Nebraska were involved with a fraudulent application in Iowa. The motive for fraud was unknown, and no charges resulted.
- Iowa and Illinois were involved with a fraudulent application in Illinois. The applicant had been suspended due to an operating while intoxicated (OWI) charge in Illinois. Pending suspensions, the applicant's name will be corrected on the fraudulent application, and the Iowa DOT Bureau of Driver and Identification Services will be notified to carry out the suspensions.
- Iowa and Illinois were involved with an allegedly fraudulent application in Iowa. The motive for fraud was unknown, and no charges resulted.
- Iowa, Illinois, and Nebraska were involved with related fraudulent applications in both Illinois and Nebraska. No charges resulted.

As of mid-September 2019, three cross-jurisdictional cases of possible fraud were still open:

- Iowa and Illinois were involved with an allegedly fraudulent application in Iowa. To date, Illinois has completed the case report and confirmed the identity documents.
- Iowa and Illinois were involved with an allegedly fraudulent application in Iowa. To date, Illinois has completed the case report. The alleged applicant denied being in Iowa.
- Illinois and Nebraska were involved with an allegedly fraudulent application in Illinois.

Additional cases of fraud and possible fraud may also exist but have not been reported. Furthermore, cases may have been initiated after completion of this report.

Beyond identification of clerical errors, possible fraud, and fraud, the cross-jurisdictional effort confirmed that no fraud existed for thousands of CDL applicants among the participating states. For example, the inclusion of Illinois represents well over 100,000 CDL applicants being cross-referenced against information from the other three participating states.

CONCLUSIONS

The Midwest Cross-Jurisdictional Image Verification project demonstrated that four SDLAs can successfully communicate and exchange data—through the FR system—to systematically identify possible CDL fraud involving multiple agencies.

The FR system was designed to be scalable in terms of the number of probe images and participating agencies. For example, South Dakota was included in the effort after project initiation. The FR system was also designed to work with systems from other vendors, which could facilitate the inclusion of agencies not using the same product as the four SDLAs involved in this project.

While FR was essential to success, the project also demonstrated the importance of interagency relationships and cooperation and agencies' dedication to the effort. Without the support and commitment of all agencies involved, including administrators, investigators, technicians, and IT staff, the technological benefits of cross-jurisdictional FR cannot be realized. Furthermore, without this commitment, CDL customers may potentially face delays in application processing.

Agency staffing was also critical to project success. During the initial stages of the project, staff were responsible for establishing the necessary interagency agreements and protocols. The support of the agencies' internal IT staff was required to achieve implementation, while limited support was required post-implementation.

The most extensive, and ongoing, staffing issue is the increased workload on staff to clear daily leads and address possible cases of fraud through external record research, intelligence gathering, and/or formal investigation. For example, during implementation, the time required for external records research increased and was greater than the proportion of external CDL applicants. During one period of time in Iowa, external records research occurred on more than 80 percent of the days on which any lead was reported. This increased workload should be recognized by participating agencies and considered when expanding cross-jurisdictional efforts to more agencies.

The project was not without cost. In addition to agency staff time, several other areas of project-related investment, or resource allocation, existed. This included initial investment in an FR system, which all states had done prior to project initiation, as well as FR system upgrade/expansion, which was necessary to accommodate the cross-jurisdictional effort. The level of upgrade varied among agencies depending on the status of the existing system. FR maintenance and support was also required and is ongoing. Lastly, agencies must possess the computational and communications infrastructure to support both FR and cross-jurisdictional data sharing.

Through the various stages of project implementation and interagency data sharing, multiple clerical errors have been corrected, and both possible and confirmed cases of CDL fraud have been identified. The motivation of one such CDL fraud case was an OWI conviction. This is the

type of possibly high-risk driver that this project was, in part, intended to discover. Identification of this type of fraud may have a positive impact on highway safety.

Ultimately, individual agencies must assess the level of project success. Project costs may be somewhat more quantifiable, such as FR system-related expenses and project-related increases in the levels of effort required by staff. Benefits tend to be more subjective, such as the value associated with correcting clerical errors and the value (or impact) of identifying different types of fraud. Nevertheless, even if no fraud had been discovered during the project, an implicit benefit may exist in confirming no cases of fraud for the well over 100,000 CDL applicants screened during the project.

REFERENCES

- AAMVA. 2015. *Facial Recognition Program Best Practices*. American Association of Motor Vehicle Administrators, Arlington, VA.
- NYS DMV. 2013. *Facial Recognition Program Traffic Safety Implications, The First Three Years: February 2010 – January 2013*. New York State Department of Motor Vehicles and Institute for Traffic Safety Management and Research, University of Albany, NY.

APPENDIX A: STATE OF THE PRACTICE PRIOR TO CROSS-JURISDICTIONAL IMPLEMENTATION

Iowa DOT Bureau of Investigation and Identity Protection

Staff

- DIRECTOR
- DEPUTY DIRECTOR
- INVESTIGATIVE ASSISTANT
- BUREAU INTERN
- 17 SWORN INVESTIGATORS STATEWIDE

Bureau Core Function

The investigative unit is responsible for criminal cases involving Title and Registration, Motor Vehicle Dealer Compliance, Iowa Driver's License, Motor Vehicle Fee for New Registration, Odometer Compliance, and NMVTIS Hits. These criminal cases may result in arrest and the filing of criminal charges. Additional responsibilities include administrative duties such as VIN corrections, Iowa-assigned VINs for Specially Constructed and Reconstructed vehicles, Odometer corrections, Bond Title inspections, Dealer On sites, and Problem Driver Pointer System (PDPS) approvals.

Case Priority

- BI LEADS/FBI REQUESTS
- IDENTITY THEFT COMPLAINT
- MOTOR VEHICLE TITLE COMPLAINTS
- NMVTIS INVESTIGATIONS
- DEALER AUDITING
- FEE FOR NEW REGISTRATION INVESTIGATIONS
- ODOMETER INVESTIGATIONS

Face Recognition (FR) History

- 2007: Bureau acquires FR
- 2013: Obtained upgrade to 4.9, add 3 licenses to the Face Examiner Workstation (FEW)
- 2014: Began FBI face requests
- 2015: Iowa Department of Public Safety obtained facial recognition. Sex Offender Registry (SOR) photos and (AFIS) criminal booking photos were added to our ABIS database.
- 2016: Multi-state CDL facial recognition (IA, NE, IL)
- 2017: Multi-state CDL facial recognition (IA, NE, IL, SD)

BI Specs

Threshold: 4.55 for 1:N and 1.6 for 1:R for current version of 4.9.

Source of Probe Images

- Candidate ID/DL images may date back to 1995-1996
- Identification/driver's license cards
- Commercial driver's Renewal, duplicate, licenses
- Kiosk renewals- 2014
- Uploaded requests from Bureau of Investigation Investigators

Our ABIS database consists of ID/DL, Sex Offender Registry (SOR), and county booking photos (captured via Livescan machine).

Daily Leads Process

- Staff
- 1 full-time
- 1 part-time (Bureau Intern)

Processing Daily Reviews

1. Review daily LEADS and compare Probe vs. Candidate's image(s).
2. Identifying Fraud and Workflow procedure
 - If Probe and Candidate are a match, Probe is moved to Research until the investigator notifies us of true identity.
 - When true identity is known we permanently deny the false identity or pass through for issuance.

DATA ERRORS

- Data errors are confirmed with the Office of Driver Services prior to flagging and entering Public Notes.

CONFIRMING IDENTICAL TWINS

- Most birth certificates have twin noted, while others do not. If "Twin" is not noted, we contact a Vital Records Investigator for confirmation.

BOOKING PHOTO ERRORS

- When identified, our office forwards to Iowa Dept. of Public Safety for correction.
3. Possible Fraud out for investigation: Intelligence collected may include, false applications, archived photos of suspect and victim, reported wages, vehicles title/registered, outstanding citations, criminal history and 50 state DL check.

Standard Letter Mailed to Applicant

The Bureau mails a standard letter to the applicant who we believe made a false application when charges are beyond the statute of limitations.(3 years typically) The applicant is asked to call the appropriate Investigator to discuss his or her application.

Priority of FR Applicants to Investigate

1. Suspects that are Wanted
2. CDL applicants
3. New DL/ID applicants
4. Renewed DL/ID applicants
5. Duplicate DL/ID applications

Iowa DOT Investigator's Steps to Working an Identity Theft/DL Fraud Investigation

These types of cases are originated from the Biometric Identification System, written complaints from victims of identity theft, local law enforcement, driver's license issuance locations, and anonymous. When a driver's license case is first assigned for investigation, the Investigator gathers all pertinent documents and information related to the investigation. This includes, but not limited to, complete driving and vehicle records within the Iowa DOT ARTS database, specific driving violation records, reported wages, an Accurint check, and a criminal history. Data collected from January 1, 2016 to January 1, 2017 indicates an identity theft/DL fraud case takes the investigator, on average, 3-4 weeks to work and close. This includes an in-person interviews of the suspect.

Correcting Driving Records

The Iowa DOT Driver and Identification Services (DIS) is responsible for correcting driving records.

Upon completion of the completed case report, based on the Investigator's recommendation to correct the driving record, the Investigative Assistant will forward the report to, DIS, Administrative Assistant for correction.

Suspensions

- If fraud occurred within the 3 year statute of limitations, DIS will suspend for maximum 60 days.
- If fraud occurred 6 years beyond statute of limitations, DIS will not suspend.

Statistics: Total Number of Leads and Average Time to Review via All Sources

Average total number of LEADS per day from Dec through May, September through November (while schools/colleges are in session).

- Monday: **600** (Heavy LEADS day due to Friday & Saturday issuances.)
 - Average total time for 1 person to review: **3 hours**
- Tuesday: **100** (Driver's license issuance stations throughout state are closed Monday, however, all 88 county driver's license issuance stations are open, thus, producing a minimal amount of LEADS this day.)
 - Average total time for 1 person to review: **30-45 minutes**
- Wednesday: **500**
 - Average total time for 1 person to review: **3 hours**
- Thursday: **300**
 - Average total time for 1 person to review: **1½ hours**
- Friday: **500**
 - Average total time for 1 person to review: **3 hours**

Average total number of LEADS per day from June through August (schools/colleges on summer break).

- Monday: **1200**
 - Average total time for 1 person to review: **6 hours**
- Tuesday: **200**
 - Average total time for 1 person to review: **1 hour**
- Wednesday: **800**
 - Average total time for 1 person to review: **5 hours**
- Thursday: **500**
 - Average total time for 1 person to review: **3 hours**
- Friday: **1000**
 - Average total time for 1 person to review: **5½ hours**

Total Number of Fraud Cases

Data Collected from 1/1/2016 to 1/1/2017

- Total number of CDL issuance cases: 1
- Total number of New DL issuance cases: 16
- Total number of DL Renewal issuance cases: 4
- Total number of DL Duplicate issuance cases:
number of Identification issuance cases: 72
- Total number of cases from all sources: 101

Total time spent collecting intelligence for one fraudulent identity from all sources:
Approximately 1 hour

Total time spent collecting intelligence for multiple fraudulent identities from all sources:
Approximately 2–3 hours

Total number of cases assigned for investigation from all sources: Approximately 8–10 per week

FBI Face Unit Facial Recognition Requests

- In 2014- signed MOU with the FBI's Facial Analysis, Comparison, and Evaluation (FACE) Services Unit
- Maximum amount of daily requests: 15
- Each daily request takes 5-10 minutes to complete

Note

March 2017- FBI CJIS Division requested we consider fulfilling facial recognition requests for agencies within the Department of Justice.

- ATF (in the short term)
- DEA
- US Marshals
- Bureau of Prisons
- Interpol

The additional Bureau staff required for this request is unknown at this time.

Illinois Secretary of State Fraudulent Review Unit

Staff

- 1 Administrative Assistant III
- 1 Executive I
- 1 Secretary
- 2 Contractual Employees
- 11 Motor Vehicle Technician II

Fraud Unit Core Function

The Fraud Review Unit is part of the Policy and Programs Bureau within the Driver Services Department. The Unit is responsible for reviewing all records where it is suspected fraud has been committed to obtain an Illinois driver's license or identification card. Suspected fraud can be identified as a result of a hit through the FRS, presentation of altered or fake documents presented to facility employees while making application for a DL or ID Card, etc. The Unit is also responsible for working cases in the FRS queues.

In 2016, the Office began issuing driver's licenses and identification cards via a Central Issuance process. This process uses a gated system to control when and if a record is sent to print. There are 4 Central Issuance gates that are related to the functions of the Fraud Review Unit: Suspected Fraud, Further Investigation, FRS-Duplicate Analyzer and FRS-Intra ID. The FRS Duplicate Analyzer and IntraID Gates correspond to the records processed in the FRS queues. The Suspected Fraud Gate is manually set/controlled and related to DL/ID applicants identified as suspected fraud through a means other than the FRS queues. The Further Investigation Gate is manually controlled and related to DL/ID applicants of special interest wherein the Office has deemed a more detailed review of the identify documents is necessary before allowing the DL/ID hard card to be produced.

Case Priority

Primarily the oldest date is worked first

Face Recognition History

- 1997 – Facial Recognition System (FRS) was included as an option in our DL issuance system contract.
- ILSOS began using FRS in November 1999 to identify fraudulent activity relating to DL & ID Card issuance, contracted with Viisage.
 - This system was used as a back-end process. If fraud was identified, we cancelled the DL or ID Card.
 - January 2000 went to “binning” to improve performance

- 2001 improved eye finding and algorithms
- 1-28-04 Viisage acquires ZN Vision Technologies (German based) European leader in FR technology
- By January 2005, approximately 17 million templates in system
- 2005 Upgrade from Eigen values to Hierarchical Graph Matching (HGM) with web based application
- 8-30-2006 - Viisage merger with Identix, Inc. to form new company-L1 Identity Solutions
 - 2008 Additional upgraded (ABIS engine)
- July 2011 SANFRAN acquires L1 Identity Solutions-creates Morpho Trust, USA
 - 8-28-12 Upgrade (ABIS)
- June 2015 - Contract with Morpho Trust expires and new Central Issuance DDLS is implemented
 - 2016 New DDLS implemented
 - Under this new system, an issuance image was required to successfully complete the FRS process before the hard card was allowed to be issued. If fraud is identified, the hard card issuance is denied. NOTE: Prior to July 2016, the FRS was ran as a back end process of our DL/ID issuance process and the Fraud Unit would cancel records suspected of committing a fraudulent offense.
- 2016 Multi-state CDL facial recognition (IL, IA, NE)
 - 2017 Multi State CDL facial recognition - adding SD)

BI Specs

Threshold: 7 for 1:N and 2 for 1:R current version of 5.0

Source of Probe Images

Driver's license and Identification cards

SDR (Safe Driver Renewal)-IntraID pre-check to determine eligibility for renewal by mail. Images date back to 2000

Upload request from local/state law enforcement and FBI 1:N search. Return results to the requesting agency.

Daily Leads Processed: Staff Involved in Daily Process

- 11 full time Motor Vehicle Technician II (located within the Fraud Review Unit)
- 14 full time employees (located outside of the Fraud Unit who work level 1 queues only)

Processing Daily Reviews

1. Review Daily Leads identified through FRS
 - a. Level 1 queues 1:N and 1:R
 - b. This is a fairly quick process. The screener will adjudicate based on a visual examination only. 1:N compares the probe image to all images in the database. 1:R compares the probe image to all past issuances for the candidate. Adjudication options are Skip, Link, Possible Fraud, Process Error and No Fraud. Level 1 is primarily worked by 14 employees outside of the Fraud Unit.
 - c. Level 2 queues 1:N and 1:R
 - d. Once a record is sent to Level 2, a Fraud Unit technician will review the records to determine if Fraud has been committed and if the applicant has already been sanctioned for the fraud offense. This requires the technician to pull microfiche, microfilm and applications to make that determination. The adjudication options are Skip, Link, Possible Fraud, Multiple, Process Error and No Fraud. If fraud is confirmed in Level 2 then a stop is placed on the records and it is sent to Level 3. If no fraud is determined then the record is adjudicated and sent to print.
 - e. Level 3 queues 1:N and 1:R
 - f. Once a record has been confirmed fraud and is sent to Level 3, an Illinois Secretary of State Police Memo is created and forwarded on to the appropriate District for an Investigator to review the case. The Investigator will meet with the applicant and determine if any criminal charges are warranted. A report will be sent back to the Fraud Unit of their findings. If an administrative sanction is warranted then a suspension or revocation will be applied to the applicants driving record for a period of one year.

2. Review Records of Special Interest:

Applicants presenting documents that were issued by US Agencies or foreign countries and for which the Illinois Secretary of State's Office receives notification that there is a high document counterfeit or fraud rate. In these cases, all documents submitted at the facility by the applicant must be forwarded to the Fraud Unit for further review. Once the documents are approved, the hard card will be released to print. If the documents are denied, an automated denial letter will be sent to the applicant.

3. LAW ENFORCEMENT CASES

These are cases that are returned to fraud unit for administrative action from the Illinois Secretary of State Police. The technician will review the case and implement a suspension or revocation. If administrative action is not necessary then the case will be loaded to the applicant's record as a history item.

4. Miscellaneous Files

These are files that have been sent to the Fraud Unit from different departments within the

Secretary of State's Office. The majority of these files are those that need combined. A suspension or revocation can also be loaded to the record based on the applicant obtaining a driver's license while being suspended or revoked on another file.

5. Letters sent to applicants

If a sanction is taken against an applicant's driving record such as a cancellation, suspension or revocation then a letter is sent. We may also send letters if we need more documents to make the determination if the driver's license or identification card should be mailed out. An applicant may request a fraud stop be placed on their driving record due to identity theft reasons. A letter is sent to the applicant explaining the purpose of the stop and what to expect with the stop on their file.

6. Sanctions loaded to DL/ID records

The fraud unit can take sanctions against an applicant record such as a cancellation, suspension or revocation. One example is if a person has obtained a driver's license during the period of a suspension then the current record will be canceled and a suspension will be loaded to their record for a period of one year. If they are revoked on one file and obtain another driver's license then the Fraud Unit will cancel and revoke their current driver's license.

7. Record Correction

Often times the Fraud Unit will have to do record corrections. This may include reloading or modifying entries on a DL or ID record, correcting the social security number or name, updating an address or combining files to reflect the most current information.

8. Calls from Facilities and DL/ID Applicants

The Fraud Unit receives about 800 phone calls per week from Facilities and applicants. These calls may be because of a letter the Fraud Unit sent out or that an applicant is in the facility and there may be a stop on their file.

9. Maintaining CI Record gates

The Fraud Unit also receives message switches from facilities. The majority of these are alerting the Fraud Unit that an applicant from one of the 9 countries has been processed. At that point the technician will mark the further investigation box on the CI table which holds up the hard card until the documents are sent to fraud for review. If the documents are approved a clear date is entered on the CI table and card will go to print. If the documents are fraudulent and are denied then a 22-113 possible fraud stop is loaded to their driving record which in turn marks the suspected fraud gate on the CI table. The suspected fraud gate will

not allow the hard card to print as long as it is marked. A denial letter is then sent to the applicant explaining that their driver's license has been denied.

Priority

Although the Fraud Unit works by date order, technicians are required to work on certain assignments for the week. They are also responsible for working an hour a day in the queues. By assigning the work this insures that all of the work is processed in date order on a daily basis.

Statistics

Commercial Driver's Licenses Issued

(This number includes new, renewal, upgrade, duplicate, or corrected CDLs issued):

- 2013 – 181,065
- 2014 – 178,923
- 2015 – 191,721
- 2016 – 179,628
- 2017 – 78,161 (thru 5/31/17)

Level 1 Queue – Daily Average of New Leads

NOTE: We did not start tracking this until December 2016.

IntraID

- 2016:
 - December - 1899
- 2017:
 - January - 2133
 - February - 1922
 - March - 2356
 - April - 2148
 - May – 2246
 - June – xxxxx (as of 6/xx/17)

IntraID for SDR

This is a special queue for individuals who are eligible to renew their DL by mail. As part of a pre-check process, we do a Intra ID process to compare their last issuance image.

- 2017
 - January – 12,003
 - February – 14,725
 - March – 13,710
 - April – no stats
 - May – 14,065
 - June – process not ran for June

Dup Analyzer

- 2016
 - December – 726
- 2017
 - January – 705
 - February – 778
 - March – 1015
 - April – 929
 - May – 896
 - June – 1081

Nebraska Department of Motor Vehicles Fraud Unit

Staff

- DIRECTOR
- DEPUTY DIRECTOR
- ADMINISTRATOR
- UNIT CHIEF
- 3 SWORN INVESTIGATORS
- 3 RESEARCH ANALYSTS

NE DMV Fraud Unit Core Function

The investigative unit is responsible for a variety of criminal and administrative investigations pertaining to driver's license, identification card and motor vehicle related crimes and criminal statutes. Investigators provide training to DMV staff relating to document fraud and identity theft. Review DMV images in the Facial Recognition System and identify subjects who are attempting to use multiple identities for fraudulent purposes.

Case Priority

1. BI LEADS
2. IDENTITY THEFT COMPLAINTS
3. TITLE FRAUD INVESTIGATIONS
4. FBI REQUESTS
5. EMPLOYEE BACKGROUND CHECKS
6. VIN INSPECTIONS
7. OUTSIDE AGENCY REQUESTS

Face Recognition (FR) History

July 2009: NE deploys FR

April 2012: Deployed Face Examiner Workstation (FEW) (1 user)

August 2012: Deployed enhancement adding NE criminal booking images to FR System

2014: Began FBI face requests

2016: Multi-state CDL facial recognition (IA, NE, IL)

2017: Multi-state CDL facial recognition (IA, NE, IL, SD)

BI Specs

Threshold: 4.1 for 1:N and 1 for 1:R, current BI version 4.4.

Source of Probe Images

Candidate ID/DL images - February 2003.

Identification/driver's license cards - February 2003.

Commercial driver's Renewal, duplicate, licenses - February 2003.

Nebraska jail images - 2001

Our ABIS database consists of ID/DL, and county booking photos

1. Records in BI with datasource="DMV": **6,946,081**

2. Records in BI with datasource = “JD” (booking photos): **690,488**

Number of Commercial Issuances

- 2013 – 45,246
- 2014 – 44,124
- 2015 – 41,704
- 2016 – 37,802

Daily Leads Process

3 full-time

Processing Daily Reviews

1. Review daily LEADS and compare Probe vs. Candidate’s image(s) and Probe vs. other DMV, jail images
2. Identifying Fraud and Workflow procedure
 - a. If Probe and Candidate are a match, Probe is moved to Research
 - b. Analyst attempt to identify which is the true identity and research if additional crimes have been committed while using the victim’s identity.
 - c. The case is then assigned to an investigator or other law enforcement agency.
 - d. The license/ID Card will not be cleared until the case is closed.

DATA ERRORS

- e. Data errors are confirmed through investigation or contacting the appropriate DMV Division. The correct data is entered on the Public Notes for the image.

CONFIRMING IDENTICAL TWINS

- f. Identify differences in appearances such as: wrinkles, scars, blemishes, teeth, ear shape, etc. Analysts compare issuance dates, SSN’s and jail records. We will reach out to the Inspector General/Social Security Administration and/or contact the subjects directly.

BOOKING PHOTO ERRORS

- g. When identified, our office contacts the Nebraska Crime Commission or the local Corrections agency directly. The correct data is entered on the Public Notes for the image.

3. Possible Fraud out for investigation: Intelligence collected may include false applications, proof of identity documents presented by the suspect, archived photos of suspect and victim, jail/prison images and data, reported wages, vehicles title/registered, outstanding citations, criminal history, 50 state DL check, USCIS documents, Identity Theft Affidavit from the victim, court documents.

Standard Letter Mailed to Applicant

The DMV does not send a letter to the applicant suspected of making a false application if the statute of limitations expires (18 months to 3 years typically). The Analyst marks the suspect's license/ID Card as "DO NOT ISSUE" in the DMV's record database. A fail safe in the system will not allow anything to be issued. If the suspect reapplies, the examiner provides the applicant with a form letter advising to contact the Fraud Unit.

Priority of FR Applicants to Investigate

1. Suspects with active warrants, probation, or parole
2. CDL applicants
3. Suspects with numerous crimes linked to the use of the false identity
4. New DL/ID applicants
5. Renewed DL/ID applicants
6. Duplicate DL/ID applications

NE DMV Fraud Unit's Steps to Working an Identity Theft/DL Fraud Investigation

These types of cases are originated from the Biometric Identification System, Identity Theft Affidavits, or local law enforcement requests for assistance.

The Crime Analyst, in almost all cases, researches the entire case before it is assigned to an Investigator. The Analyst collects all documents presented to the DMV, sends an Identity Theft Affidavit to the victim and identifies additional crimes committed by the suspect while using the victim's identity.

Outside agencies are contacted to assist in verifying identities and are notified of violations which should be followed up by their office. Out of state DMV's are notified when it is determined a suspect was issued a license using another identity in that state.

Once the Analyst finishes with his/her research, the case file is turned over to the Unit Chief with the Analyst's recommendations. The Unit Chief reviews the case, then assigns it to a DMV Fraud Investigator, refers to another law enforcement agency or closes the case. The case may be closed due to expired statute of limitations, unidentifiable suspect or the county attorney's office declines to prosecute.

Correcting Driving Records

The suspect must contact the court and move criminal convictions to their true identity before the license will be cleared for issuance. Traffic convictions suspending the driving privileges must also be moved to the suspect's true identity. If the suspect is not known or cannot be located, the DMV Fraud Analysts will assist the victim in the process of moving the convictions by contacting the local county attorney or court on the victim's behalf.

At times licenses are cancelled due to Fraud and cannot be issued until the DMV Fraud Unit's Case is cleared.

Statistics: Total Number of Leads and Average Time to Review Via All Sources

Average total number of LEADS per day from January through December

- **Monday: 1200 – 1500**
 - Average total time for per person to review: **6 – 7 hours**
- **Tuesday: 100**
 - Average total time for per person to review: **30-45 minutes**
- **Wednesday: 700**
 - Average total time per person to review: **3 – 4 hours**
- **Thursday: 750**
 - Average total time per person to review: **3 – 4 hours**
- **Friday: 650**
 - Average total time per person to review: **3 hours**

Total Number of Fraud Cases

- Total number generated from BI Matches (2016): 76
- Total number generated from BI Matches (2015): 68
- Total number generated from BI Matches (2014): 129
- Total number generated from BI Matches (2013): 157
- Total number generated from BI Matches (2012): 205

This does not include cases generated by Identity Theft Affidavits submitted by victims.

- Total time spent collecting intelligence for one fraudulent identity from all sources: 1 day – 1 week
- Total time spent collecting intelligence for multiple fraudulent identities from all sources: 1 day – 2 weeks
- Total number of cases assigned for investigation from all sources: Approximately 8–10 per week

FBI Face Unit Facial Recognition Requests

- In 2014- signed MOU with the FBI's Facial Analysis, Comparison, and Evaluation (FACE) Services Unit
- Maximum amount of daily requests: 10
- Each daily request takes 5-10 minutes to complete

Note

March 2017- FBI CJIS Division requested we consider fulfilling facial recognition requests for agencies within the Department of Justice.

- ATF (in the short term)
- DEA
- US Marshals
- Bureau of Prisons
- Interpol

The additional Unit staff required for this request is unknown at this time.

SD Department of Public Safety Driver Licensing Program Facial Recognition Procedures

Staff

- DIRECTOR – Program Director
- INVESTIGATOR – One
- EXAMINER – One

Program Core Function

The function of facial recognition in SD is to detect a fraudulent application and to check photos against our database that are sent by the SD Fusion Center in the hopes of apprehending those involved in criminal activity.

Case Priority

1. Requests from SD Fusion Center, SD Highway Patrol
2. CDL/DL/ID issuance

Source of Probe Images

- Candidate ID/DL images may date back to 2000
- Identification/driver's license cards
- Commercial driver's Renewal, duplicate, licenses
- Uploaded requests from SD Fusion Center, SD Highway Patrol

Daily Leads Process

- Staff
- 1 Investigator
- 1 Examiner

Processing Daily Reviews

1. Review daily LEADS and compare Probe vs. Candidate's image(s).
2. Identifying Fraud and Workflow procedure
 - a. If Probe and Candidate is a match a dossier is created and forwarded to the Fusion Center in Sioux Falls.

DATA ERRORS

- b. Data errors are confirmed by the Investigator prior to flagging and entering Public Notes.
3. Possible Fraud out for investigation: Intelligence collected may include false applications and archived photos of suspect and victim.

Priority of FR Applicants to Investigate

1. Suspects that are wanted
2. CDL applicants
3. New DL/ID applicants
4. Renewed DL/ID applicants
5. Duplicate DL/ID applications

SD DPS Investigator's Steps to Working and Identity Theft/DL Fraud Investigation

These types of cases are originated from the Biometric Identification System, SD Fusion Center, SD Highway Patrol and driver's license issuance locations. Photos are compared to DPSs database and if fraud is detected a dossier is sent to the SD Fusion Center in Sioux Falls.

Statistics: Total Number of Leads and Average Time to Review Via All Sources

Average total number of LEADS per day from Dec 2015 through May 2017

- Monday: **210** (Heavy LEADS day due to Friday & Saturday issuances.)
 - Average total time for 1 person to review: **2 hours**
- Tuesday: **90** (Driver's license issuance stations throughout state are closed Monday, with the exception of the Sioux Falls exam station.)
 - Average total time for 1 person to review: **1 hour**
- Wednesday: **150**
 - Average total time for 1 person to review: **1½ hours**
- Thursday: **160**
 - Average total time for 1 person to review: **1½ hours**
- Friday: **160**
 - Average total time for 1 person to review: **1½ hours**

APPENDIX B: MIDWEST CROSS-JURISDICTIONAL IMAGE VERIFICATION PROJECT: AGENCY EXPERIENCE RESPONSES

Iowa

1. What would you consider the greatest success(es) of the cross-jurisdictional project?

The project has been a success as the system is doing what it was designed to, catch fraud. Though we have not caught much fraud and it has been simply clearing up records in other states, there have been many successes along the way. A few to note, is during the development stage of the project, the 2-day Intel Sharing Meeting involving all four states was a major accomplishment. In terms of travel arrangements, open communication, cooperation, and successfully developing a plan to share secure information.

Upon going live with the project, I would consider the second greatest success to be the rapid communication among the states when fraud was identified. This communication occurred via phone calls between individuals from the impacted states, emails and conference calls. This helped expedite the investigation, and if determined the CDL applicant was applying under their identity, was released for issuance in a timely manner.

2. What opportunities may exist by continuing the cross-jurisdiction effort and/or expanding the effort to other agencies or license types?

To ensure our records are accurate and ensuring the roadways are safe by issuing one license to one driver.

3. What would you consider the greatest challenge(s) of the cross-jurisdiction project?

Understanding the states' best business practices, their shortage of staff, and overall workload.

4. What challenges may exist by continuing the cross-jurisdiction effort and/or expanding the effort to other agencies or license types?

Having the system designed to continually add additional states onto the multi-state facial recognition system, as well as, to include more than just commercial drivers which may lead up to all forms of identification cards and licenses. Having the opportunity to work with more agencies with more than just commercial drivers means a greater opportunity to combat fraud and identity theft, however, that also means a larger opportunity for challenges to arise. Challenges that may arise include: delayed response times, miscommunication in expectations, lack of staffing due to increased workload, and differences in business practices.

5. Could any changes/improvements be made to the cross-jurisdiction project? YES NO

If YES, what changes/improvements would you recommend?

A change to improve the project would be the ability to add Public Notes to a record and have all jurisdictions be able to view the notes. This would eliminate a phone call to the other state requesting they research the record for past fraud or record should have been identified as a data error.

An additional improvement would be the ability to look up archived images from the other states.

This would assist the end user when trying to determine if the individuals being compared are two different people or the same without disrupting the workflow of the impacted state.

6. To what degree has the cross-jurisdiction project increased the work load of existing staff?

- None
- Slightly
- Moderately**
- Significantly

For all responses other than None, please provide a description(s) of the impacts on staff?

Workload increased slightly by having added communication with the impacted state(s), gathering daily statistics, organizing meetings and traveling to other states for demonstrations of the system.

7. Has the cross-jurisdictional project impacted your internal workflows, e.g., order in which leads are addressed? YES NO

If YES, how has your workflow been impacted?

Illinois

1. What would you consider the greatest success(es) of the cross-jurisdictional project?

Identifying fraud beyond state lines.

2. What opportunities may exist by continuing the cross-jurisdiction effort and/or expanding the effort to other agencies or license types?

The capability to prevent identity fraud on a larger spectrum by using images instead of only demographics.

3. What would you consider the greatest challenge(s) of the cross-jurisdiction project?

Keeping Multi-State cases as a priority to meet other states' guidelines.

4. What challenges may exist by continuing the cross-jurisdiction effort and/or expanding the effort to other agencies or license types?

A larger search database would result in more leads which would increase our already high workload.

5. Could any changes/improvements be made to the cross-jurisdiction project? **YES** **NO**

If **YES**, what changes/improvements would you recommend?

The external lead would display the issue date with the image.

6. To what degree has the cross-jurisdiction project increased the work load of existing staff?

- None
- Slightly-at this time
- Moderately
- Significantly

For all responses other than None, please provide a description(s) of the impacts on staff?

Extra time is necessary for research and intelligence collecting. The Illinois Fraud unit is a separate entity from Secretary of State Police

7. Has the cross-jurisdictional project impacted your internal workflows, e.g., order in which leads are addressed? **YES** **NO**

If **YES**, how has your workflow been impacted?

Multi State leads are processed as priority causing internal cases to be set aside until Multi-State cases are complete.

Nebraska

1. What would you consider the greatest success(es) of the cross-jurisdictional project?

The greatest success is the cooperation between the four states. Although there was not a lot of fraud detected, states were able to clean up records that were either data entry errors or conflicting information provided by applicants to different states (example: name changes, nicknames, inconsistent DOB's, questionable proof of identity documents, identified surrendered licenses that were not noted on all states records.) I consider another success the fact that a state was unaware that their applicant previously used a false identity in another state. This knowledge allowed the current state to double check that the false identity was not used in their state.

2. What opportunities may exist by continuing the cross-jurisdiction effort and/or expanding the effort to other agencies or license types?

Continuing the cross-jurisdictional project will help combat fraud and assist in ensuring accurate records.

3. What would you consider the greatest challenge(s) of the cross-jurisdiction project?

My greatest challenge was keeping statistics for the project. During the project, NE DMV Fraud Unit had a change of personnel and the Fraud Unit Chief retired December 2018 with not replacement named. This caused additional workload outside the cross-jurisdiction project.

4. What challenges may exist by continuing the cross-jurisdiction effort and/or expanding the effort to other agencies or license types?

Since there were very few fraud issues located, the cross-jurisdiction states have not been able to work through any issues that may come up between states when fraud is identified - such as: response times, statute of limitations issues, jurisdiction issues, cooperation between states and the actual criminal prosecution of a case identified by another state's facial recognition system..

5. Could any changes/improvements be made to the cross-jurisdiction project? **YES** NO

If YES, what changes/improvements would you recommend?

An improvement would be the ability to view other states' notes on images. Although we only identified one active fraud case, we did identify old fraud cases worked by other states. If states were been able to view other states' notes, each state could list: case number, status of the case and if the image was the victim or suspect identity. Had this been available, it would have given the identifying agency an immediate answer as to whether their applicant was using the correct identity.

6. To what degree has the cross-jurisdiction project increased the work load of existing staff?

Slightly

Workload increased for statistics, meetings, phone calls.

7. Has the cross-jurisdictional project impacted your internal workflows, e.g., order in which leads are addressed? YES **NO**

South Dakota

1. What would you consider the greatest success(es) of the cross-jurisdictional project?

The cross-jurisdictional project has expanded our fraud detection ability. Through the process, we have been provided a more secure and uniform way to share information both through the cross-jurisdictional project and through Riss.net.

2. What opportunities may exist by continuing the cross-jurisdiction effort and/or expanding the effort to other agencies or license types?

It's not clear what other opportunities may exist, other than expanding our fraud detection ability.

3. What would you consider the greatest challenge(s) of the cross-jurisdiction project?

The greatest challenge is staffing and taking on the additional task of reviewing the matches from out-of-state. The overarching challenge of the project itself was getting everyone together to develop uniform processes and communication. The in-person meeting we had was very valuable.

4. What challenges may exist by continuing the cross-jurisdiction effort and/or expanding the effort to other agencies or license types?

As noted above, staffing is a concern, and expanding the effort will require more resources. The other challenge is the possible pushback from agency and state leadership when it comes to expanding the effort to other agencies or license types.

5. Could any changes/improvements be made to the cross-jurisdiction project? **YES** NO

If **YES**, what changes/improvements would you recommend?

It would be helpful to be able to see all the demographics for leads from other states.

6. To what degree has the cross-jurisdiction project increased the work load of existing staff?

- None

- Slightly
- **Moderately**
- Significantly

For all responses other than **None**, please provide a description(s) of the impacts on staff?

Leads are a top priority and there is only one person in South Dakota who is processing them. The additional workload has created some issues but for now we have absorbed it. We will need to look at the possibility of adding staff if the project grows much more.

7. Has the cross-jurisdictional project impacted your internal workflows, e.g., order in which leads are addressed? **YES** **NO**

If **YES**, how has your workflow been impacted?

Leads are processed first thing in the morning and other work is delayed since there isn't a full-time employee dedicated to multi-state.

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