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May 8, 2007

The Honorable Michael Chertoff  
Secretary of Homeland Security  
U.S. Department of Homeland Security  
Attn: NAC 1-12037  
Washington, DC 20528

6 CFR Part 37  
RIN 1601-AA37  
[DHS-2006-0030]

Re: Comments for Minimum Standards for Driver's Licenses and Identification Cards Acceptable to Federal Agencies for Federal Purposes

Submitted by: Governor Jennifer M. Granholm, State of Michigan  
Terri Lynn Land, Secretary of State, State of Michigan

Dear Secretary Chertoff:

On behalf of the State of Michigan, we are jointly submitting formal comments in response to the *Notice of Proposed Rulemaking on the Minimum Standards for Driver's Licenses and Identification Cards Acceptable by Federal Agencies for Federal Purposes*. The State of Michigan maintains a solid commitment to protecting our citizens and ensuring the highest standards in processing and distributing identification documents. In that respect, we have carefully weighed the significance of these proposed regulations, the impact this will have on 7 million Michigan driver's license holders and others, and the costs associated with this program.

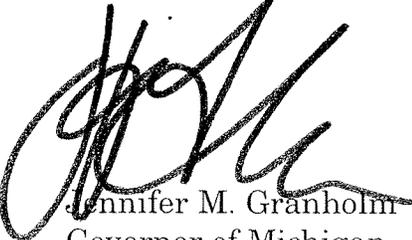
Security measures that protect both our homeland and hometowns must be both effective, feasible for states, yet still contain mechanisms to protect the privacy of our citizens. As you know, the National Governors Association, the American Association of Motor Vehicle Administrators, and the National Conference of State Legislatures have already commented on the need for adequate time and flexibility for states to implement their own

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innovations while ensuring compliance with the federal statute. For example, Michigan intends to pursue a driver's license that will allow our citizens to hold one document that complies with both REAL ID and the Western Hemisphere Travel Initiative. Such efforts will require a sustained and focused partnership between state and federal agencies at a level not yet fully demonstrated by the Department of Homeland Security (DHS).

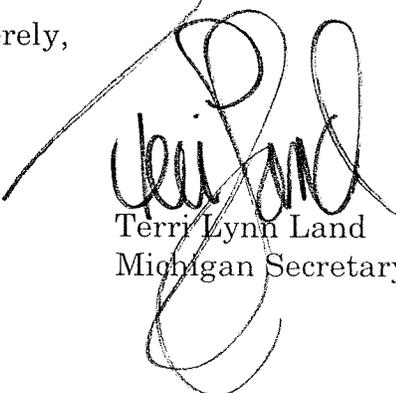
The rules proposed by DHS offer some assurance that the federal government understands the complexity of implementing REAL ID in 50 states. However, recent actions by some states reflect sincere concern about federal policy goals associated with REAL ID and the means being used to achieve them. DHS must take seriously the states' position that the process of revamping the standards for identification documents is a federal mandate that should be backed by federal funding. The Department of Homeland Security estimates that the cost to states of complying with Real ID will exceed \$14 billion over ten years. States will incur most of these costs (\$11 billion) in the first five years, including \$1 billion in up front investments. While Michigan has begun system upgrades that should ease our ability to implement new standards, REAL ID will only contribute to overall national security if all states agree to fully implement REAL ID. To ensure such success, Michigan supports full federal investment and flexibility to implement state-based solutions.

If you need clarification on Michigan's response, please contact Michael Wartella, Director of the Michigan Department of State Customer Services Administration, at [WartellaMI@Michigan.gov](mailto:WartellaMI@Michigan.gov) or 517-322-3448. Thank you for the opportunity to comment.



Jennifer M. Granholm  
Governor of Michigan

Sincerely,



Terri Lynn Land  
Michigan Secretary of State

c: Michigan congressional delegation  
Michigan State Legislature leadership  
Michael Wartella, Michigan Department of State

May 8, 2007

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Re: Comments for Minimum Standards for Driver's Licenses and Identification Cards Acceptable by Federal Agencies for Federal Purposes

Submitted by: Governor Jennifer M. Granholm, State of Michigan  
Terri Lynn Land, Secretary of State, State of Michigan

**1. How can DHS tailor the address of principal residence requirement to provide for security of categories of individuals, such as Federal judges, law enforcement officers, victims of domestic violence? [§ 37.11]**

Michigan does not have a confidential address program and does not feel one is necessary. Our justification for this position is as follows:

- Residential addresses for these individuals are available on other public records.
- The Driver Privacy Protection Act exempts personal information from disclosure.
- Michigan law requires that the voter residential address must be the same as the driver's license address.
- Michigan is unaware of any negative incidents resulting from an improperly obtained address.

**2. How would Canadians, who enter the United States without having to obtain a visa and who stay in the United States for extended periods, be affected if they are unable to obtain a U.S. REAL ID driver's license that could be used for Federal purposes? [§ 37.11]**

A valid Canadian passport should be acceptable ID for Federal purposes within the U.S. Many Canadian citizens drive into the U.S. to fly out of Detroit Metro Airport. Currently, Canadians traveling into the U.S. temporarily do not have to obtain a visa. Michigan feels it is economically advantageous for the DHS to accept Canadian passports as IDs for federal purposes. Michigan recommends DHS work with Canadian authorities directly to resolve these issues.

**3. What alternative documentation regimen may serve for Temporary Protected Status (TPS) aliens; asylees and asylum applicants; refugees; adjustment applicants; and aliens granted deferred action and whether these groups need a REAL ID driver's license or identification card before their applicable wait period expires? [§ 37.11]**

Michigan needs documentation from the federal government showing individuals are in the U.S. legally. Michigan would use this documentation as the ID verification document and would need to receive these documents from the federal government in a timely manner. Michigan currently accepts, and would accept in the future, an Employment Authorization Document (EAD) which these individuals should be able to provide.

These individuals would be handled through the exception process in Michigan, verifying them through appropriate channels, and working with refugee organizations that sponsor them. Michigan is not sure whether there is a need for a REAL ID compliant document for these individuals.

**4. Full Legal Name [§ 37.11]**

Michigan feels a standard convention should be established for full legal name on the issuance of any government document. U.S. passports, if provided as a source document for REAL ID, complicate the verification process for customers whose names do not match other source documents, as full legal name is not required on passports. Consistency and accuracy in naming convention depends on a single standard between states and the federal government. The U.S. Department of State should adopt a similar standard to that required by states under the REAL ID Act for determining an individual's full legal name.

**5. How can the Federal government better assist States in verifying information against Federal databases? [§ 37.13]**

The federal verification systems should be available to the states at no cost. Michigan feels the verification systems need to be available by the federal implementation date and be able to handle the load. A single uniform query should be created to simplify verification to multiple systems. Assuming the verification systems are not available at implementation, DHS must provide guidance to the states on re-certification after issuance and strategies for issued licenses for which source documents cannot be verified.

**6. Should individuals born before 1935 with established histories be wholly exempt from birth certificate verification requirements or handled under exception process? [§ 37.13]**

Individuals born before 1935 with an established history should be wholly exempt from the birth certificate verification requirements. Individuals who do not have an established history should be handled through an approved exception process. Michigan also suggests changing the static date of 1935 to an age exemption of 62 years of age, which is the age you can begin collecting social security benefits. Those 62 years of age or older with established histories should be exempt from birth certificate verification requirements when they apply for Real I.D. cards.

**7. Performance-based independent adversarial testing. [§ 37.15] [§ 37.41]**

Michigan believes the proposed standards will provide more secure documents. However, Michigan is unsure how process issues will be handled that may result from annual testing. The final regulation must clarify how states must respond if state cards fail subsequent tests.

As an alternative to adversarial testing, Michigan suggests a card design security program (CDSP). A CDSP would allow us to work proactively with our card manufacturer and a variety of stakeholders concerning driver's license security. Meetings would include law enforcement, internal enforcement staff, businesses, schools, other interested entities, and representatives from the manufacturer. The discussions about driver's license security could be held on a quarterly or semi-annual basis or simply as needed. Stakeholders would be asked to provide feedback, including counterfeit documents, to help determine what attempts have been and are being made to compromise our driver's license (and ID card) security. Michigan anticipates being able to take quick action to counteract any counterfeit attempts. For example, Michigan could release information on other previously unreleased but existing security features that could be used to authenticate a Michigan license.

Contract costs may increase as Michigan will want to request regular assessments of our REAL ID. We would also want the vendor to modify the card if security problems surface with the existing card.

**8. How would a State integrate the type of ICC technology necessary to provide a travel facilitation benefit at the land and sea border along with the common machine readable technology, while also including MRZ meeting ICAO standards? [§ 37.17] [§ 37.19]**

Michigan would need to work with its card manufacturer to include both technologies in our card design specifications. The technology that is used must maintain the privacy and security of individual data. Michigan will work with DHS to securely share data. Michigan would continue to follow provisions of both Michigan and federal driver privacy protections laws.

**9. What data elements should be included in the machine readable zone and what are the privacy considerations regarding the selection of such data elements and this technology. [§ 37.17]**

- Expiration Date
- Date of Birth (information needed for warrant check by law enforcement)
- Unique Identification Number
- Citizenship Indicator (optional for WHTI compliance)
- Gender (information needed for warrant check by law enforcement)
- Name (information needed for warrant check by law enforcement)

From a DMV perspective, Michigan sees no need to store the full name history in the MRZ. If the full name history is stored in the MRZ, then encryption should be used.

Storing the address within the bar code gives ready access to a driver's residential location just by swiping the card. Retailers may use or sell swiped and stored names/addresses. The same process could also be used for stalking and harassment purposes. The passport does not contain an address. If the REAL ID license and passport provide equal access for Federal purposes, then the REAL ID licenses do not need to contain the address in the MRZ. Although Michigan opposes the inclusion of the address in the MRZ, if the final regulation requires it, the data should be encrypted.

**10. Should and how encryption could be employed to secure the information stored in the machine readable zone (MRZ) of the cards (2D bar code), while permitting law enforcement access. [§ 37.19]**

Michigan does not believe encryption is needed if the address, citizenship, and full-name history are not stored in the MRZ. One single encryption key, nationwide, could be compromised. Multiple encryption keys create difficulty in reading the cards for law enforcement or any other official use. Once encryption is compromised, it would be very costly to the agency to reissue all licenses. Encryption of the date of birth would also prevent use of MRZ by bars/restaurants to combat under-age drinking and cigarette sales. This is an effective and simple method of checking for counterfeit documents currently, since an MRZ is more difficult to change than the front of the card.

If encryption is adopted in the final regulation, partial encryption is preferred. The fields that Michigan believes should be encrypted are address, full-name history and citizenship.

Legislation should be enacted to address privacy concerns. Severe penalties should be imposed for misuse of data in the MRZ.

**11. Does demonstrable law enforcement need exist to include address in the machine-readable zone portion of the REAL ID driver's license? [§ 37.19]**

Michigan does not feel there is a need to include the address in the MRZ. The same information is on the face of the card and also stored in the driver database.

If officers simply run a record, they will have the most up-to-date address information on the subject unless the Michigan Secretary of State system is down. Having the address and other information in the barcode would be beneficial in that situation. Some officers have the ability to “swipe” a license to read the information encoded on the card from their patrol car, others do not.

As DHS has admitted, there is no way to verify address. The passport does not contain an address. If the REAL ID license and passport provide equal access for federal purposes, then the REAL ID licenses does not need to contain the address in the MRZ. Although Michigan opposes the inclusion of the address in the MRZ, if the final regulation requires it, the data should be encrypted.

**12. If states choose to produce WHTI-compliant D/L and ID cards, could citizenship be denoted on the face or machine-readable portion of card? [§ 37.19]**

The citizenship could be encrypted/denoted in the machine readable zone of the card. Placing citizenship on the face of the card could lead to discrimination or profiling; therefore, Michigan believes some other benign language or symbol could be placed on the face of the card to denote WHTI compliance. Michigan’s preference would be to store citizenship designation centrally, which could then be accessed via electronic means by authorized persons.

**13. What procedures and business processes could be adopted to issue REAL ID D/L and ID cards that include citizenship information for WHTI compliance? Would or could states incorporate a separate WHTI-compliant technology (such as RFID) in addition to the REAL ID PDF417 barcode requirement? [§ 37.19]**

Michigan intends to pursue a combination WHTI/Real ID compliant license/ID system. Michigan would denote citizenship and type of document provided and verified on our database. Proposed draft rules for PASSCARDS require a separate application, the administration of an oath, and the incorporation of a machine readable technology required by DHS. Michigan could add these requirements as an optional item for Michigan card applicants who possess proof of citizenship. The vast majority of Michigan original driver’s licenses are persons born in Michigan and would have a verifiable Michigan birth certificate. In addition, data could be sent to the U.S. Department of State as needed for adjudication.

Encrypted citizenship data could also be included in the MRZ, but Michigan’s preference would be to store this information centrally and access it via electronic means by authorized persons.

**14. Handling changes of address for renewals and re-issuances. [§ 37.03 and 37.23]**

Michigan seeks clarification regarding whether a change of address transaction is subject to the same requirements as a card renewal or reissue. A reissue is defined in the draft rule as “a card that a State DMV issues to replace a card that has been lost, stolen or damaged”. [§ 37.03] Relating to renewed and reissued cards, the draft rule states that “Any information that has changed since prior issuance (such as name or address) must be established through original source documents as provided in Subpart B, and must be verified, or in the case of address, validated.” [§ 37.23.b.1.ii.] In addition, Michigan seeks clarification on the difference between “verified” and “validated” as referenced in § 37.23.b.1.ii.

Michigan requires proof of residency to obtain an original Michigan driver’s license or ID; however, it does not require proof of residency for every address change or at time of renewal or re-issuance. A requirement to present proof creates a conflict with Michigan law as it requires a driver to change the address immediately (257.315 [1]) and many documents that would prove residency require the passage of time to obtain (utility bills, bank statements, etc.). The requirement to provide two proofs of residency when changing an address will prevent any type of remote means of changing an address. Driver/ID card holders would be forced to appear to present proof of the new address. We believe the wait times encountered and

the documentation needed to change an address would be a disincentive and drivers would not report address changes. We rely on accurate address information to inform drivers of sanctions against their driver licensing privilege and to inform them about vehicle registration renewals and cancellations. Law enforcement uses the address to locate individuals.

Perhaps most importantly, Michigan law aligns the driver/ID card address with the voting address. If Michigan drivers do not report address changes, they will become disenfranchised; unable to vote at their new address, no longer a resident of the old address. Circumstances could also arise where voting driver/ID card holders report a new address but the State cannot accept the proof. These voters may also be disenfranchised if they do not provide additional proof (see comments to question 18 for more details).

Michigan questions the need to verify another address in Michigan once REAL ID identity, Michigan residency, and lawful status has been established. Currently, passports do not contain an individual's address. Michigan believes verification of subsequent address changes should be eliminated from the rules.

As an alternative to applicant validation, Michigan could support a subscription to the National Change of Address or other third party address verification system.

**15. What are State's concerns on proposed renewal procedures, including suggestions on any alternative approaches for remote renewals and authentication of remote renewals? [§ 37.23]**

Michigan is concerned that the requirement for identity re-verification with every renewal and re-issuance will increase state costs and increase the electronic messaging traffic between states and agencies, yet adding little value to the process. The intent of this rule would seem to be to ensure that the identities of deceased drivers and ID card holders are not assumed by others. Michigan understands the need to re-verify temporary REAL ID licenses and supports re-verification of those driver and ID card holders who do not have SSNs.

Michigan suggests alternatively that states receive death records regularly from SSA and timely update driver and ID records with this information, prohibiting any future activity. The Michigan remote driver's license/ID renewal/duplicate process will comply, at a minimum, with industry standard best practices for authentication.

If verification systems are delayed, Michigan seeks authority to submit unverified data in batch mode once systems are available instead of waiting for license renewal to re-verify.

Again, Michigan believes verification against federal systems should be available at no cost to the states.

**16. Source Document Retention [37.31]**

Michigan believes the requirement to obtain color scanners by December 31, 2011 is unnecessary. All states electing to issue REAL IDs will have been doing so for at least one year before this requirement is due. Color scanning adds additional costs for purchase of new equipment, image storage, and scanning time for no apparent purpose. The authenticity of the document must be ascertained prior to issuance of the REAL ID credential. The retention of the image of that document provides proof that the document was presented, but cannot prove its authenticity. Retaining the document in color adds no value to its retention.

**17. To what extent would the adoption of any physical security performance-based standard have on modification of existing office space or construction of new space, or its impact on historical properties? [§ 37.43]**

For State of Michigan facilities, the only area impacted is its technology location where the database is stored. It is expected that there will be minimal changes required, as this is already a secured facility. However, Michigan may need to update the technology location security standards to comply with mandatory NASPO Class 2 standards.

If Michigan continues to mail cards under the current system, mailing staff will need to have background checks and the security of handling the cards may need to be tightened or enhanced.

**18. Is the proposed list of disqualifying offenses appropriate, too large, or insufficient as it concerns REAL ID? [§ 37.45]**

Michigan believes the disqualifying offense list is appropriate.

**19. What concerns exist with the Federalism aspects of the rule, particularly arising from the proposed background check requirements? [§ 37.45]**

Depending on DHS' response to question 14 above, Michigan is apprehensive that the proposed rules erode the important principles of Federalism, especially as they pertain to our state's ability to manage elections. Many aspects of the draft rule, including the background check proposal, could adversely affect Michigan's ability to efficiently administer and maintain its voter registration database, the Qualified Voter File (QVF). The U.S. Constitution specifically empowers the states to regulate the "times, places and manner of holding elections", concurrently with the federal government. US Const, Art I, § 4, cl 1. As proposed, the rule that implements the REAL ID Act seriously compromises our state's constitutional authority to manage the "times, places and manner of holding elections".

The National Voter Registration Act of 1993 (NVRA), which was designed to streamline the process of registering voters, requires states to allow an individual to register to vote at the same time that he or she applies for or renews a driver's license. 42 USC 1973gg-3. Subsequent to the enactment of the NVRA, Michigan amended its Election Law to require that a person's address of record for voting purposes must be the same as the address indicated on his or her driver's license or personal identification card. MCL 168.509o(3). In keeping with the national effort to enhance the efficiency of the voter registration process and the accuracy of voter registration information as mandated by the NVRA, Michigan law allows residents to report a change in address directly to the clerk of the city, village, township or county in which they reside, or to the Secretary of State. When the Secretary of State is notified by a local clerk that a person has changed his or her address for voting purposes, the Secretary of State updates the address indicated on his or her driver's license or personal identification card record to match the address provided to the local clerk.

Furthermore, the Federal Help America Vote Act of 2002 (HAVA), imposes additional election administration requirements upon the states, including the creation and maintenance of a single computerized statewide voter registration list. Of particular relevance to the REAL ID Act, HAVA contains at least two provisions that require states to verify a voter's identity. First, HAVA provides that "[t]he chief State election official and the official responsible for the State motor vehicle authority of a State shall enter into an agreement to match information in the database of the statewide voter registration system with information in the database of the motor vehicle authority to the extent required to enable each such official to verify the accuracy of the information provided on applications for voter registration." 42 USC 15483(a)(5)(B)(i). Secondly, HAVA requires certain first-time voters to present proof of identity at the polls. 42 USC 15483(b)(1).

Michigan's QVF system was deliberately designed to satisfy the mandates of the NVRA and HAVA, while efficiently enhancing the accuracy and completeness of our voter registration and driver's license and personal identification card records. The Secretary of State presently maintains "parallel" driver and qualified voter files and has the ability to carefully track change of address information to ensure consistency and reliability. Michigan's voter registration application specifically notifies applicants that:

“Michigan law states that the same address must be used for voter registration and driver license purposes. Therefore, if the residence address you provide on this form differs from the address shown on a driver license or personal identification card issued by the State of Michigan, the Secretary of State will automatically change your driver license or personal identification card address to match the residence address entered on this form. If an address change is made, the Secretary of State will mail you an address update sticker for your driver license or personal identification card.” State of Michigan Form ED-121 (Rev. 4-04). See also MCL 257.307(1)(b).

Thus, a Michigan resident’s address change that is reported to one governmental source (i.e., the local election clerk) is promptly reported to another agency (i.e., the Secretary of State) and updated for both voting and identification purposes.

As noted in response to item number 14 herein, Michigan objects to the notion that a REAL ID cardholder’s address change requires the person to report and document the change in person at a DMV office. (*See* NPRM Supplementary Information, Part II.J., “Documents supporting name changes or address changes since prior issuance must be presented to the DMV and verified. This process should apply any time a driver’s license or identification card is renewed or reissued for any purpose.”) Should the DHS revise this aspect of the proposed rule, serious consideration should be given to allowing Michigan to continue its efficient process of automatically modifying the applicant’s driver’s license or personal identification card address to match the address reported on its voter registration application form.

In the alternative, the DHS should recognize that Michigan law requires that a person’s address for voting purposes match the address indicated on his or her driver’s license or personal identification card, and exempt the employees of Michigan’s local election clerks from the proposed regulatory requirements to submit to comprehensive background checks, and store and verify documentation of a person’s address change.

If the relief requested above is not granted, Michigan may be compelled to amend its Election Law and alter its election administration procedures. Given the “parallel” nature of Michigan’s driver and qualified voter files, a modification of this sort may compromise – but most certainly will complicate – our state’s ability to comply with the voter registration and list maintenance requirements of the NVRA and HAVA.

For these reasons, Michigan seeks clarification to determine whether its successful process may continue, or whether the DHS will require employees of local election clerks to submit to the proposed background checks. If the DHS concludes that local election clerks are subject to the background check requirements, Michigan also seeks a determination of whether the document imaging and verification requirements proposed in the draft rules will apply to an address change that is reported to a local election clerk.

## **20. Costs [§ 37.51]**

In 2003, the Michigan Legislature committed over \$30 million to revamp the state’s outdated technology and process for the issuance of these cards. When the REAL ID Act was passed, the department immediately began incorporating the known requirements of REAL ID into the business requirements of the new system. This positions Michigan to incorporate many of the requirements that were known prior to the release of the draft rules. However, we recognize that there will be additional costs to implement the REAL ID Act in our state.

Estimates from the National Governors Association (NGA), the American Association of Motor Vehicle Administrators (AAMVA), the National Conference of State Legislatures (NCSL) and U.S. Department of Homeland Security have identified these costs to be at least \$11 billion over ten years. Michigan’s greatest concerns are with the new ongoing costs that we will face, such as state-to-state charges, verification charges, background checks, increases in license card and ID issuance fees for individuals, color scanning and training. Michigan believes that REAL ID security can only be achieved if all states are in compliance with the Act. States like Michigan expect that existing state investments made to meet the terms of

REALID will be reimbursable by the federal government. To achieve this goal, states must be given the federal resources needed to ensure timely and uniform implementation by states that would justify Michigan's investment in the secure technologies we plan to employ.

**21. What benchmarks are appropriate for measuring progress toward implementing the requirements and what schedule and resource constraints will impact these benchmarks?**

**[§ 37.63]**

Benchmark recommendations: State legislation enacted; business requirements; systems design (analysis and technical specs); testing and implementation; employee background and financial history checks; training plan; security plan; exception procedures; availability of verification systems; funding.

Recommendations for performance-based standards: Verification that vendor contract provisions are acceptable, physical site audits, third-party audits, status check on background check of staff.

Mandatory NASPO Class 2 standards, with the addition of fingerprint background checks, appear to be adequate. DHS could provide a list of vendors who meet the standards.

**22. Should a uniform design/color be implemented nationwide for non-REAL ID driver's licenses and identification cards and whether DHS should also implement a standardized design or color for REAL ID licenses? [§ 37.67]**

Each state should be able to personalize their card to prevent counterfeiting. AAMVA issued uniform card standards in 2005 (Driver's License/Identification Card Design Specifications, Annex A, section A.7.7.2.). DHS needs to provide guidance as to whether the standards apply to both the REAL ID compliant cards and the non REAL ID compliant cards.

**23. Birth certificate verification systems. [§37.13] [§37.23]**

The proposal to authenticate birth certificates through an automated validation process is a sound concept that is feasible and an economical method of controlling fraud. The approach will place heavy demands on vital records operations to develop queryable databases and the secure systems infrastructure to support the expected needs of agencies issuing Real ID. The timeline proposed, however, presumes an available and operating national system for birth certificate verification that does not currently exist, is not currently being pursued aggressively on a national scale, and for which there is no possibility of this being available by May of 2008. The states will need at least a two-year lead-time window and, most importantly, will need adequate funding to develop the required databases and establish the infrastructure to adequately support such a system. A mechanism to ensure continued financial support to maintain this system would be needed as well. Michigan could enable access to EVVE compatible data since 1950 with only modest funding needed to improve the database. EVVE compatible birth data prior to 1950 do not exist. An estimated \$6 million would be needed to clean and complete the 1935 forward data files for Michigan to enable an EVVE type system.

Additionally, the rule requires the Department of Motor Vehicles to refer an applicant whose birth certificate cannot be authenticated through an EVVE type system to the vital records office for a resolution. This would be a very inefficient approach. The EVVE information comparison process remains rather crude and results in a 10 percent or higher false negative rate due to an inability to read handwriting, relatively minor discrepancies in the vital records database and similar problems. A tiered query system is needed, whereby assistance from the vital records office staff can be requested through an online messaging system. This will enable efficient problem resolution between agencies. Vital records offices will need funding support to provide this level of service for DMV application processing.

Finally, the rules do not address the essential need for the birth certificate authentication process to include information on when a death has been recorded. Vital records files for Michigan and for most states do not adequately identify when a death has occurred. The use of an unannotated birth certificate for a deceased individual is a common tactic for establishing a false identity. Michigan would require funding to develop an effective method for tagging birth records with the fact of death. It is practical to expect that 80 percent or more of the birth records for deceased individuals could be identified and tagged using Michigan data, while a comprehensive matching to historic deaths outside of Michigan would require a coordinated and adequately funded national effort. Matching of births to historic Michigan deaths would require \$1.4 million and take 15-24 months to complete once funds were made available. The matching process would create an alternative to recertification at each renewal for U.S. born applicants.