Motor Vehicle Division Informational Memo # 24-01
Non-Compliant Designation for Non-REAL ID Driver's License and Identification Cards

DATE: 2/13/2024
FROM: Kasey Lee, MVD Compliance Officer
TO: All Motor Vehicle Division staff, and Iowa County Treasurers and County Treasurer's staff that issue driver's licenses and non-operator's identification cards

EFFECTIVE: February 21, 2024

SUBJECT
This informational memo explains the requirement for the non-compliant designation on all non-REAL ID driver's licenses and identification cards issued.

SUMMARY
To issue REAL ID driver's licenses and identification cards, the Iowa DOT is required to comply with all federal regulations laid out by the Department of Homeland Security (DHS) as detailed by the REAL ID Act.

Our current policies and procedures for issuing REAL ID credentials follow all guidelines provided by DHS with the exception of one guideline outlined for issuance of non-REAL ID credentials.

6 CFR 37.71(a) directs states issuing non-REAL ID driver's licenses and identification cards that are not acceptable by Federal agencies for official purposes to clearly state on the face and in the machine-readable zone that the card is not acceptable for official purposes and must have a unique design or color that clearly distinguishes them from driver's license and identification cards that meet REAL ID standards.

As of 2/21/24, all non-REAL ID credentials issued by the Iowa DOT will have the language 'NOT FOR REAL ID ACT PURPOSES' printed in the machine-readable zone of the card to ensure the Iowa DOT's compliance with the REAL ID Act.
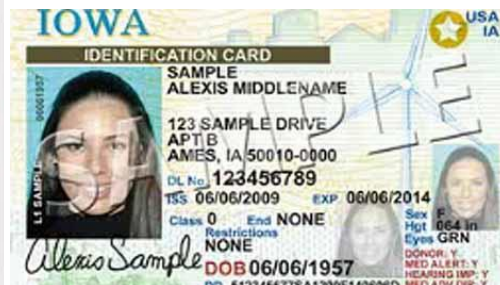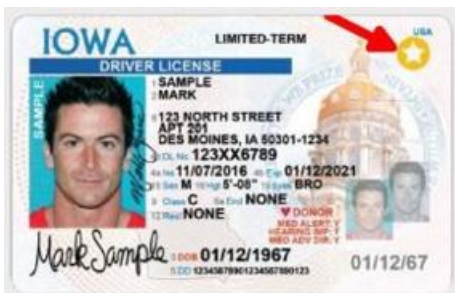
LINK TO RELEVANT CODE
https://www.ecfr.gov/current/title-6/chapter-I/part-37/subpart-F/section-37.71

CURRENT
Currently, REAL ID credentials issued by the Iowa DOT are distinguished by a gold circle with a cut-out star (identified as the "gold star"), printed in the upper right-hand corner of the credential.
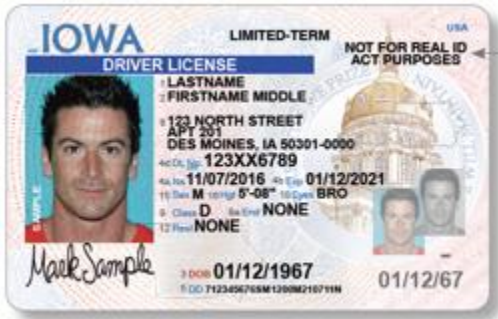
Non-REAL ID driver's licenses and identification cards do not have the gold star and are not distinguished with any other designations on the face of the credential.

NEW

Effective 2/21/24, REAL ID credentials issued by the Iowa DOT will continue to be distinguished by a gold star printed in the upper right-hand corner of the credential; no changes are being made to credentials with the REAL ID gold star.

All non-REAL ID credentials will be distinguished by 'NOT FOR REAL ID ACT PURPOSES' printed in the upper right-hand corner of the credential. See two examples below:

BUSINESS IMPACT

This change does not impact issuance processes for driver's license or identification cards. ARTS programming will automatically add the new designation to all non-REAL ID credentials issued.

The preview screen in ARTS will show either the gold star or the 'NOT FOR REAL ID ACT PURPOSES' language as it will appear on the card.

QUESTIONS AND ANSWERS

WHY ARE WE MAKING THIS CHANGE NOW?

The Department of Homeland Security (DHS) ensures state compliance with federal REAL ID regulations. In our most recent review with DHS, we were notified that the non-compliance designation has now become a firm requirement for all non-REAL ID driver's license and non-identification cards issued. This had not been a requirement outlined by DHS in prior reviews. We are implementing this change to become compliant with federal REAL ID regulation.

HOW DOES THE NON-COMPLIANCE DESIGNATION AFFECT MY DRIVER'S LICENSE OR ID?

A driver's license or ID card with the non-compliant designation, 'NOT FOR REAL ID ACT PURPOSES' printed on it will be equivalent to a non-REAL ID credential that does not have the non-compliance designation prior to this change. It is still acceptable for use for identification purposes and driving privileges (if applicable); however, it is not a federally compliant REAL ID and cannot be used for identification for TSA when flying commercially or entering a federal building once REAL ID is effective after May 7, 2025. Additional identification would be required along with a non-REAL ID driver's license or ID card.

HOW LONG WILL IT TAKE TO ADD THE NEW DESIGNATION TO CURRENTNON-REAL ID CREDENTIALS?

It will take several years to fully implement this change. We will add the new designation to non-REAL ID credentials as customers appear for a renewal or duplicate transactions. We will not be asking customers to appear for the sole purpose of adding the non-compliance designation to their credential.

WILL INTERIM DOCUMENTS INCLUDE THE 'NOT FOR REAL ID ACT PURPOSES' LANGUAGE?

No, interim documents will not include the new non-compliance designation just as they do not currently include the REAL ID designation of the gold star.

HOW WILL NON-COMPLIANT CREDENTIALS BE INDICATED IN ARTS CREDENTIAL HISTORY?

Credential History lists details about previous credentials issued to a customer. The last column indicates the REAL ID status of the credential. See example below.

Updates to the REAL ID status column will help issuance staff to identify what designation was applied to the credential.

- A blank entry indicates that the credential was issued prior to the deployment of the REAL ID Act changes within the ARTS system (in 2013) and the credential did not have any REAL ID designation.
- The text "Non-Compliant" will inform users that the credential was not a REAL ID, and the credential was blank of any designation as this was issued prior to this deployment.
- The text "Real ID" will note a credential that was issued with the REAL ID gold star on it.
- And the text, "Not for REAL ID act purposes" are credentials that will display this new designation, it is not a REAL ID, and the credential was issued after the deployment date for this change.