



# Stage 1 Business Analysis

California Department of Technology, SIMM 19A.3 (Ver. 3.0.9, 02/01/2022)

## 1.1 General Information

**1. Agency or State Entity Name:** 2740 - Motor Vehicles, Department of

If Agency/State entity is not in the list, enter here with the organization code.

Click or tap here to enter text.

**2. Proposal Name and Acronym:** California (CA) Identifications (IDs) for All, Assembly Bill (AB) 1766

**3. Proposal Description: (Provide a brief description of your proposal in 500 characters or less.)**

Assembly Bill (AB) 1766 (Secretary of State (SOS), chapter 482, Statutes of 2022) requires the California (CA) Department of Motor Vehicles (DMV) to, no later than July 1, 2027, begin issuing original and renewal identification (ID) cards to individuals who are unable to submit satisfactory proof that their presence in the United States (U.S.) is authorized under federal law. These individuals would need to provide satisfactory proof of identity and California residency. Furthermore, this bill would clarify that documents provided by an applicant, to prove age or identity, are not public records and are prohibited from disclosure except as necessary to comply with an order, warrant, or subpoena, issued by a court.

**4. Proposed Project Execution Start Date:** 7/1/2025

**5. S1BA Version Number:** Version 1

## 1.2 Submittal Information

**1. Contact Information**

Contact Name: Kristin Triepke

Contact Email: [Kristin.Triepke@dmv.ca.gov](mailto:Kristin.Triepke@dmv.ca.gov)

Contact Phone: (916) 964-1099

**2. Submission Type:** New Submission

If Withdraw, select Reason: Choose an item.

If Other, specify reason here: Click or tap here to enter text.

**Sections Changed, if this is a Submission Update: (List all sections changed.)**

Click or tap here to enter text.

**Summary of Changes: (Summarize updates made.)**

Click or tap here to enter text.

3. Attach [Project Approval Executive Transmittal](#) to your email submission. See Attachment
4. Attach [Stage 1 Project Reportability Assessment](#) to your email submission. See Attachment

## 1.3 Business Sponsorship

### 1. Executive Champion (Sponsor)

Title: [Deputy Director](#)

Name: [Bernard Soriano](#)

Business Program Area: [Policy](#)

### 2. Business Owner

Title: [Assistant Division Chief/Program Manager](#)

Name: [Nakisha Howard](#)

Business Program Area: [Policy](#)

### 3. Product Owner

Title: [TBD](#)

Name: [TBD](#)

Business Program Area: [TBD](#)

## 1.4 Stakeholder Assessment

The Stakeholder Assessment is designed to give the project team an overview of communication channels that the state entity needs to manage throughout the project. More stakeholders may result in increased complexity to a project.

4. **Indicate which of the following are interested in this proposal and/or the outcome of the project. (Select 'Yes' or 'No' for each.)**

State Entity Only: [No](#)

Other Departments/State Entities: **Yes**

Public: **No**

Federal Entities: **No**

Governor's Office: **Yes**

Legislature: **Yes**

Media: **No**

Local Entities: **No**

Special Interest Groups: **No**

Other: **Choose Yes or No.**

**5. Describe how each group marked 'Yes' will be involved in the planning process.**

Other Departments/State Entities:

Department of Finance (DOF) will review the Budget Change Proposal (BCP) to fund the project's planning and execution process. Department of Technology (CDT) will provide guidance regarding the PAL process, oversight, and procurement.

Governor's Office is an invested stakeholder and will be interested in the outcome of the project since it is legislatively mandated.

Legislature is an invested stakeholder and will be interested in the outcome of the project since it is legislatively mandated.

## **1.5 Business Program**

**1. Business Program Name:** Administrative Services Division (ASD)

**2. Program Background and Context:**

The Administrative Services Division (ASD) provides core services essential to the day-to-day operations of the department. This division is responsible for directing the complete scope of administrative functions and employee services including budgetary and fiscal management, contracts development and procurement processes, development and delivery of training programs, mail operations, and forms management. ASD also provides information and guidance on processes, reports, and data elements to support backend processes, and other support services.

Budgets & Fiscal Analysis Branch (BFAB): The budget and fiscal planning of this branch will be impacted by the project. The branch will contribute to the fiscal activities required to support the implementation of AB 1766 identification cards. The branch will also coordinate budgetary reporting and oversight to ensure that the project efforts adhere to regulatory financial management requirements. The branch will provide data and metrics required to effectively oversee the project budget, produce workload forecasting and Activity Based Costing Modeling.

Business Management Branch (BMB): The procurement planning of this branch will be impacted by the project. The Information Technology (IT) Acquisitions Unit will assist by participating and facilitating the Primary and Ancillary procurements and contracts.

**3. How will this proposed project impact the product or services supported by the state entity?**

ASD staff will be impacted from a resource (time/staff/budget) perspective. ASD will provide support and resources to obtain additional funding through budget change proposals for the planning and project lifecycle. The division will make budgetary adjustments, procure contractor services and/or technical solution, and provide administrative updates of forms, manuals, department website, and publication.

**4. Business Program Name:** Information Systems Division (ISD)

**5. Program Background and Context:**

The Information Systems Division (ISD) provides input on technology strategy and will be impacted in terms of time and resources. ISD provides support to the current system and advises on business needs and requirements for the proposed solution. ISD assigns resources for project efforts, including Project Approval Lifecycle (PAL), privacy-related support, and organizational change management. ISD ensures that DMV establishes appropriate and reasonable administrative, technical, and physical safeguards to ensure compliance with the provisions of the Information Practices Act of 1977. ISD handles and resolves privacy related inquiries from the public and all DMV areas, and provides expertise on privacy matters including collection, use, sharing, and storage of data. It conducts privacy threshold analysis and privacy impact assessments on new and existing solutions that collect personal information. Through DMV's enterprise-wide change network, ISD ensures internal buy-in as the project is deployed.

**6. How will this proposed project impact the product or services supported by the state entity?**

Staff will be impacted from a resource (time/staff/budget) perspective. These areas will be affected as the new project will require each of those areas to modify its processes, procedures and controls, as the proposed system will have its predefined functions. Staff will require training on these new functions and procedures.

ISD will provide the technical expertise and knowledge of existing systems to transition the current system to the future system and provide input/resources to assist with technical solutions and project management. ISD will provide support for the analysis, programming, testing, installation, and maintenance of the proposed solution. ISD will secure network communications and ensure State IT standards and policies are met. ISD will support project efforts by navigating the California Department of Technology's PAL process and contract management.

**7. Business Program Name:** Field Operations Division (FOD)

**8. Program Background and Context:**

The Field Office Division (FOD) is the public face of state government with 186 offices providing services to over 32 million people annually. FOD processes applications for driver licenses,

identification cards, vehicle registration, and issues several varieties of license plates and indicia. FOD plays a key role in the overall performance of the DMV's statutory role as a regulatory, revenue-collecting, traffic safety and information storing agency, and assumes the role of liaison between the public at large and State government. Each year over 32 million people visit a field office statewide.

**9. How will this proposed project impact the product or services supported by the state entity?**

FOD will be impacted by applicants visiting the field office to apply for an original/renewal identification card under the provision of the new law. FOD will process an influx of applications and customers waiting at the field office may experience a higher wait time than normal.

FOD will provide input and resources to assist in the business process flow solution, provide relevant support and analysis, conduct production validation and provide continued field staff training to ensure Motor Voter integrity. FOD will also assist with implementation efforts and process impacted transactions and will be impacted from a resource (time/staff/budget) perspective.

**10. Business Program Name:** Policy Division (Policy)

**11. Program Background and Context:**

The Policy Division (Policy) is responsible for setting policy and procedures for the department across licensing, registration, and information release. Policy is also responsible for translating those policies and procedures into key industry oversight and driving critical policy-related programs like Driver License, Commercial Driver License, Identification card, Motor Voter and Autonomous Vehicles. Policy aligns to the DMV's strategic mission by effectively supporting internal department customers, improving the safety and well-being of the motoring public, and properly regulating the motor vehicle industries.

Policy will lead project efforts including development of project scope, contract development, business requirements, user acceptance testing, end to end testing with Secretary of State (SOS), develop policy and procedures, and provide ongoing program maintenance and production support.

**12. How will this proposed project impact the product or services supported by the state entity?**

Policy will be impacted from a resource (time/staff/budget) perspective.

Policy will oversee project efforts, obtain required resource adjustments (staff & budget), review procurement documents, identify and establish program policy, identify requirements to obtain ID cards, develop regulations, coordinate, implement the ID programs, develop business requirements, user stories, test scripts, and conduct user acceptance testing of changes, and mitigate issues before release to production, communicate with all stakeholders to ensure successful implementation.

**13. Business Program Name:** Investigations Division (INV)

#### **14. Program Background and Context:**

The Investigations Division (INV) conducts inquiries into a variety of crimes associated with the Motor Vehicle Industry, driver license and identification fraud investigations, and improprieties internal to DMV. INV provide expertise on card security features, document authentication, and training. INV processes confidential transactions related to original and renewal of driver license and identification cards. INV conducts secondary reviews and analyzes applicant documents for validations and securing identities. DMV Investigators are vested with peace officer status under the California Penal Code (PC) Section 830.3(c) and California Vehicle Code (CVC) Section 1655.

#### **15. How will this proposed project impact the product or services supported by the state entity?**

INV workload will increase to accommodate the influx of applications that may need a secondary review. INV will also provide input and ideas with regard to processes, procedures, and auditing. Staff will participate in user acceptance testing, and coordinate and implement new processes for confidential transactions. INV can assist with developing memorandums, policy, and procedural documentation.

#### **16. Business Program Name:** Customer Services Division (CSD)

#### **17. Program Background and Context:**

The Customer Services Division (CSD) serves as the liaison between the DMV and the public. It consists of the Contact Centers Branch, Help Desk, Outreach, and Customer Experience Branch. CSD primarily supports the DMV's Strategic Plan goal to become California's leading customer-centric public sector organization. CSD offers a variety of critical services throughout the State and accommodates the varying needs of customers. It provides services to the most populous state in the country and is often the government agency Californians interact with the most.

#### **18. How will this proposed project impact the product or services supported by the state entity?**

CSD will be impacted from a resource (time/staff/budget) perspective. CSD will continue to receive customer inquiries into the contact centers inquiring the new identification option, questions related to AB 1766, and status of their application.

CSD will need to modify its interactive voice response (IVR) prompts which is a computer-operated telephone system that allows customers to interact with the department's telephone keypad or speech recognition for which services can be inquired. CSD will further need to modify its automated online chatbot feature to include the new identification card option with questions and answers built in to assist customers which increases service operational efficiency through multichannel technology.

#### **19. Business Program Name:** Digital Services Division (DSD)

#### **20. Program Background and Context:**

The Digital Services Division (DSD) plays a pivotal role in transforming the agency's digital landscape. As the digital channel and e-commerce business owner, the DSD is responsible for ensuring that online transactions and services are accessible, efficient, and secure. This includes overseeing the development and maintenance of digital platforms that facilitate millions of customer interactions, such as vehicle registration renewals, driver's license applications, and other essential services. In addition to managing these digital channels, the DSD leads user experience (UX) design, ensuring that every touchpoint is intuitive and user-friendly. The division also oversees content creation and translation services, ensuring that information is accurate, up-to-date, and accessible to California's diverse population. This focus on inclusivity ensures that language barriers do not impede access to critical services. Furthermore, DSD drives automation initiatives that streamline operations, reduce manual workloads, and enhance service delivery. By leveraging cutting-edge technology, the division works to minimize processing times and improve overall efficiency, ultimately delivering a seamless experience for users. The DSD's strategic function is to align digital initiatives with the DMV's broader goals, ensuring that the agency meets the evolving needs of Californians in a mobile-first world.

**21. How will this proposed project impact the product or services supported by the state entity?**

DSD will be impacted by applicants attempting to apply online for an original identification card under the provision of the new law. DSD will need to continually optimize the digital experience and channel messaging to help the customer self-serve where possible, reduce traffic and wait times at the field office, and reduce inbound calls to the contact center.

DSD will provide input and resources to assist in the business process flow solution, provide relevant support and analysis, provide user experience design, make recommendations about architecture, conduct production validation, create onboarding materials and ensure training assets are available on the DMV Driver to ensure Motor Voter integrity. FOD will also assist with implementation efforts .

**22. Business Program Name:** Operations Division (OPS)

**23. Program Background and Context:**

The Operations Division (OPS) at DMV headquarters is responsible for managing core services such as driver license and identification (DL/ID) applications and card requests. OPS often acts as a subject matter in complex DL/ID processing. OPS is responsible for identity and legal presence verifications, updating and maintaining records, issuing and reissuing cards, answering phones, card production quality assurance, and ensuring compliance with state and federal regulations. Additionally, OPS provides extensive support to customer inquiries, DMV field offices, and contact centers, offering guidance on complex cases. The division also oversees vital document services, including digital imaging, mailing, print operations, and warehouse management, ensuring efficient internal and external operations.

**24. How will this proposed project impact the product or services supported by the state entity?**



Operations will face resource impacts, including time, staff, and budget. This bill will require system programming updates. The influx of identification card applications will necessitate additional bilingual staff, new training, and updated procedures. There will be increased card production and costs, along with a surge in phone calls, emails, and exceptions requiring manual review. More floor space, cubicles, and computers will be needed to accommodate the workload and staffing increase, along with new reports to monitor progress. Collaboration will be required with ISD, Policy, FOD, CSD, DSD, and Legal. Additionally, there will be a need to provide more customer support and assist field offices with the increased demands.

## 1.6 Project Justification

### 1. Strategic Business Alignment

#### Enterprise Architect

Title: Enterprise Architect (EA) Specialist

Name: TBD

Strategic Plan Last Updated? 1/1/2021

Strategic Business Goal: Objective 2 – Digital Services

Alignment: This project will deliver simpler, faster ways to fulfill customer needs through increased digital services. AB 1766 requires the department to expand its identification card options to include any individual meeting satisfactory requirements. This provides the opportunity for technology to evolve to meet the expectations and demands of the public.

Strategic Business Goal: Objective 3 – Technology & Data

Alignment: This project will create flexible, secure technology systems to enable innovation and continuous improvement. AB 1766 applicants are able to process their application online and with the department transitioning to a modern platform, we must ensure applicant information is protected.

Strategic Business Goal: Objective 5 – Customers

Alignment: The department is the leading customer-centric public sector providing access to secured identification cards. AB 1766 will allow the department to continue to build trust in our integral government services with the intention of making customers' experience as intuitive and streamlined as possible.

**Mandate(s):** State

Bill Number/Code, if applicable: AB 1766

Add the Bill language that includes system-relevant requirements:

AB 1766 will do the following:



- Allow for the issuance of an identification card to those who are unable to provide satisfactory proof of legal presence in the United States (US).
- Allow for the issuance of a Senior ID card for AB 1766 ID card applicants.
- Allow for the issuance of reduced fee and no fee ID cards for AB 1766 ID card applicants
- Preclude sharing an AB 1766 ID card applicant signature with SOS, including sharing via Help America Vote Act/California Online Voter Registration (HAVA/COVR).
- Remove the system constraint the prevent an AB 60 DL (Driver License) holder from obtaining an ID card.
- Allow an AB 1766 ID card holder to switch to a REAL ID DL/ID.
- Require an AB 1766 ID card applicant to provide an identity document.
- Require and AB 1766 ID card applicant to provide a residency document.
- Allow for acceptable Identity and residency document to be uploaded via eDL44 (electronic DL processing) and scanned through the ABBY program.
- Allow for AB 1766 ID card applicant to provide an (social security number) SSN and (social security administration) SSA verification using existing procedures.
- Do not require an AB 1766 ID card applicant to provide an SSN.
- Allow for a secondary review process similar to the AB 60 DL secondary review process.
- Allow for AB 1766 ID card holder to renew their ID card based on existing renewal process.
- Allow for AB 1766 ID card holder to renew their ID card remotely based on existing remote renewal process.
- Allow for AB 1766 ID card to be processed through the existing (California) CAL ID program and portal.

## 2. Business Driver(s)

**Financial Benefit:** Yes

Increased Revenue: Yes

Cost Savings: No

Cost Avoidance: No

Cost Recovery: No

Will the state incur a financial penalty or sanction if this proposal is not implemented? No

If the answer to the above question is "Yes," please explain:

AB 1766 is mandated by law and requires the department to uphold to the provisions required within the bill.

## **Improvement**

Better Services to the People of California: **Yes**

Efficiencies to Program Operations: **No**

Improved Equity, Diversity, and/or Inclusivity: **Yes**

Improved Health and/or Human Safety: **Yes**

Improved Information Security: **Yes**

Improved Business Continuity: **No**

Improved Technology Recovery: **No**

Technology Refresh: **No**

Technology End of Life: **No**

## **1.7 Business Outcomes Desired**

### **Executive Summary of the Business Problem or Opportunity:**

Existing law authorizes the department to issue a driver license or identification card to an applicant that submits satisfactory proof of their Social Security number, California residency, and legal presence in the United States and pass the driver license exam requirements for issuance of a driver license. For those applicants that cannot establish proof of legal presence, the department will issue a driver license provided the applicant establishes satisfactory proof of their identity and California residence. Applicants who cannot establish their legal presence are ineligible to apply for an identification card.

AB 1766 would require the Department of Motor Vehicles to, no later than July 1, 2027, issue identification cards to individuals who are unable to submit satisfactory proof that their presence in the United States is authorized under federal law provided they present satisfactory proof of identity and California residency. This bill would additionally require the department, at the next scheduled revision, to include a statement on the reverse of a federal non-compliant driver license or identification card that the card does not establish eligibility for firearms purchases.

AB 1766 will expand identification eligibility to approximately 500,000 individuals over a seven (7) year period.

#### **Objective ID: 1.1**

**Objective:** Issue original identification cards to eligible applicants who submit satisfactory requirements under AB 1766 provisions upon implementation.

**Metric:** Track the number of original AB 1766 identification cards issued through workload reports, within the first ninety (90) days to measure success.

**Baseline:** There is 0% option for identification card customers to apply for an identification card under provisions granted under AB 1766.

**Target Result:** 100% of applicants are able to apply and obtain an AB 1766 identification card upon providing satisfactory requirements upon implementation.

**Objective ID:** 1.2

**Objective:** Enable the issuance of renewed identification cards to eligible applicants who submit satisfactory requirements under AB 1766 provisions by the implementation date.

**Metric:** Number of renewed identification cards issued as reported in the workload report within the first ninety (90) days post-implementation.

**Baseline:** There is 0% option for identification card customers to apply for a renewal AB 1766 identification card upon providing satisfactory requirements.

**Target Result:** 100% of applicants are able to apply for a renewal of an AB 1766 identification card.

**Objective ID:** 1.3

**Objective:** Facilitate the issuance of replacement identification cards to eligible applicants who meet AB 1766 requirements upon implementation.

**Metric:** Number of replacement identification cards issued as recorded in the workload report during the first ninety (90) after implementation.

**Baseline:** There is 0% option for identification card customers to apply for a replacement AB 1766 identification card upon providing satisfactory requirements.

**Target Result:** 100% of applicants are able to apply for a replacement of an AB 1766 identification card upon implementation.

## 1.8 Project Management

### 1. Project Management Risk Score: 0.8

Follow the instructions in Statewide Information Management Manual (SIMM) Section 45 Appendix B Project Management Risk Assessment Preparation Instructions.

Attach a completed Statewide Information Management Manual (SIMM) Section 45 Appendix A Project Management Risk Assessment Template to the email submission. See Attachment

### 2. Project Approval Lifecycle Completion and Project Execution Capacity Assessment

Does the proposal development or project execution anticipate sharing resources (state staff, vendors, consultants, or financial) with other priorities within the Agency/state entity (projects, PALs, or programmatic/technology workload)?

**Answer:** Yes

Does the Agency/state entity anticipate this proposal will result in the creation of new business processes or changes to existing business processes?

**Answer** (No, New, Existing, or Both): [Existing Processes](#)

## 1.9 Initial Complexity Assessment

### 1. Complexity Assessment (Business Score): [3.0](#)

Follow the instructions in the [Statewide Information Management Manual \(SIMM\) Section 45 Appendix D Complexity Assessment Instructions](#).

Attach a completed [Statewide Information Management Manual \(SIMM\) Section 45 Appendix C Complexity Assessment Template](#) to the email submission. See Attachment

NOTE: Business complexity is initially completed in PAL Stage 1. Technical complexity is initially completed in PAL Stage 2.

### 2. Noncompliance Issues: Indicate if your current operations include noncompliance issues and provide a narrative explaining how the business process is non-compliant.

Programmatic regulations: [No](#)

HIPAA/CIIS/FTI/PII/PCI: [No](#)

Security: [No](#)

ADA: [No](#)

Other: [No](#)

Not Applicable: [Yes](#)

Noncompliance Description:

[Click or tap here to enter text.](#)

### 3. Additional Assessment Criteria

If there is an existing Privacy Threshold Assessment/Privacy Information Assessment, include it as an attachment to your email submission.

How many locations and total users is the project anticipated to affect?

Number of locations: [Original applications are processed from 176 Field Offices throughout the state. A digital signature, fingerprint, and photo of the applicant are captured in order to process the identification card. In addition to local field offices, there are approximately 300 staff located at Headquarters that will be impacted by AB 1766 such as Law Enforcement Units, Investigations both in the field and Headquarters, Training, Help Desk, Mandatory Actions Unit, Issuance, and Record Security & Identification Unit.](#)

<a href="#">City</a>	<a href="#">State</a>	<a href="#">Number of Locations</a>	<a href="#">Approximate # of Staff</a>
----------------------	-----------------------	-------------------------------------	--

Region I Field Office	CA	33	302
Region II Field Office	CA	19	639
Region III Field Office	CA	24	593
Region IV Field Office	CA	26	479
Region V Field Office	CA	21	606
Region VI Field Office	CA	15	779
Region VII Field Office	CA	17	723
Region VIII Field Office	CA	21	596
Headquarters	CA	1	300

Estimated Number of Transactions/Business Events (per cycle): 500,000

Approximate number of internal end-users: 300

Approximate number of external end-users: 5,000

## 1.10 Funding

### Planning

1. Does the Agency/state entity anticipate requesting additional resources through a budget action to **complete planning** through the project approval lifecycle framework? No

If Yes, when will a budget action be submitted to your Agency/DOF for planning dollars?

[Click or tap to enter a date.](#)

2. Please provide the Funding Source(s) and dates funds for planning will be made available:

### Project Implementation Funding

1. Has the funding source(s) been identified for **project implementation**? Yes

If known, please provide the Funding Source(s) and dates funds for implementation will be made available:

[Motor Vehicle Fund, July 1, 2025.](#)

Will a budget action be submitted to your Agency/DOF? Yes

If "Yes" is selected, specify when this BCP will be submitted: 02/03/2025

2. Please provide a rough order of magnitude (ROM) estimate as to the total cost of the project:  
[Between \\$10 Million and \\$50 Million](#)

**End of agency/state entity document.**

**Please ensure ADA compliance before submitting this document to CDT.**

When ready, submit Stage 1 and all attachments in an email to [ProjectOversight@state.ca.gov](mailto:ProjectOversight@state.ca.gov).

### Department of Technology Use Only

Original "New Submission" Date: 11/05/2024.

Form Received Date: 11/05/2024.

Form Accepted Date: 11/05/2024.

Form Status: Complete.

Form Status Date: 11/05/2024.

Form Disposition: Approved.

If Other, specify: [Click or tap here to enter text.](#)

Form Disposition Date: 11/05/2024.

Department of Technology Project Number (0000-000): 2740-240.