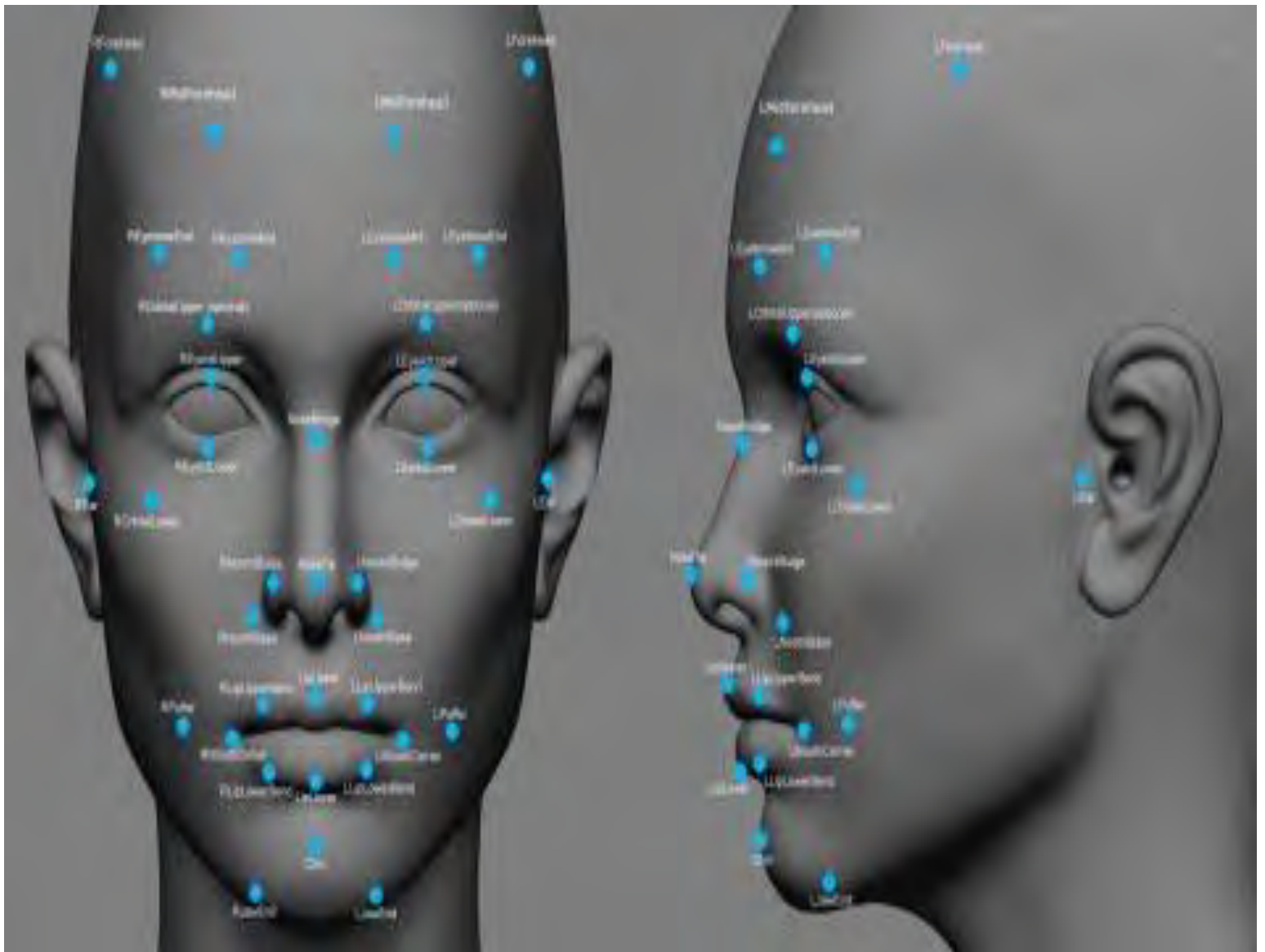




WASHINGTON STATE DEPARTMENT OF
LICENSING

Facial Recognition Matching System Annual Report

October 2013



dol.wa.gov

Department of Licensing Facial Recognition Matching System Annual Report

Under RCW 46.20.0371, the Department of Licensing is required to submit a report to the Governor and the legislature on investigations based on Facial Recognition Matching System (FRMS) results and related data during the previous fiscal year by October 1 of each year. This report is for the fiscal year beginning on July 1, 2013.

Item	Number
1. Total number of potential matches identified by FRMS	176,970
2. Investigations initiated by the department due to FRMS	Not available ^A
3. Determinations that a person committed a prohibited practice under RCW 46.20.0921	1,173 ^B
4. Hearings requested	11
5. Determinations that were confirmed by a hearings examiner	10
6. Determinations that were overturned by a hearings examiner	1
7. Number of cases where a person declined a hearing or did not attend a scheduled hearing	308
8. Number of determinations that were referred to law enforcement	9 ^C

^A All 176,970 potential matches were visually inspected by DOL staff. **The vast majority of potential matches were found to be false matches** and no further investigation was done. It is important to note that this number represents *potential* matches that the system returns. Further investigation was initiated where matches were believed to be the same person. None of them are considered to be fraud simply because they are returned as potential matches, or even if they are the same person. For example, a person formerly licensed in Washington State may have moved to another state and legally changed their name. Upon later returning to Washington, the person may have applied for a license under their new name and simply neglected to notify DOL of an existing record under a previous name.

Specific data on the number of confirmed matches that required further investigation but did not result in a determination that a person committed a prohibited practice under RCW 46.20.0921 were not collected for this reporting period.

^B Of the 1,173 cases where it was determined that a prohibited practice was committed, 319 resulted in a driver's license suspension. The remaining 854 were not recommended for suspension at this time for one of the following reasons:

- **Identicard fraud** - DOL does not have the authority to take suspension action against a person who commits a prohibited practice relating to Identicards. In lieu of suspension action, a formal notice was mailed to the person requiring that the person submit additional documentation proving identity. Failure to prove identity resulted in the cancellation of the Identicard.

Department of Licensing Facial Recognition Matching System Annual Report

- **The prohibited practice occurred more than 6 years ago** – The statute of limitations for criminal prosecution in a case involving a prohibited practice is six years. Under that basis, DOL does not actively pursue administrative action in a case that is more than six years old.
- **Habitual Traffic Offenders (HTO)** – Since the driving privileges of a person who has been determined to be an HTO (Revoked in the First Degree) are revoked for several years, investigators complete an abbreviated case to document the prohibited practice, but do not recommend further suspension action. The records are combined under the person's true name and noted as such. This provides a notation on the record that an alias exists.
- **21-year old age-related cases** – if the prohibited practice occurred as a result of a person under the age of 21 attempting to obtain an identity document misrepresenting the person's age, DOL generally prevents the document from being produced and issued when possible, and sends a letter to the person requiring the person to return the temporary document, or permanent document if it has already been mailed, within 15 days. If the person fails to respond within the 15 days, an investigative report is completed and appropriate administrative action follows.
- **Unable to identify** – If DOL is unable to identify the true identity for the person the document is cancelled rather than suspended.
- **Backlog** – 356 of the 854 fraud cases identified have not been assigned to an investigator at this time as a result of a backlog of cases.

^c All cases where it was determined that a prohibited practice was committed involving an Enhanced Driver's License or Identicard (EDL/ID) were referred to law enforcement. For cases that do not involve an EDL/ID, the following criteria are used to determine whether a case should be forwarded to a law enforcement agency:

- Preferably two or more identifiable identity theft victims. The Washington State Patrol (WSP) may pursue charges if there is only one victim, provided WSP finds financial loss.
- Identity theft has occurred within last 6 years where a written application has been submitted.
- A prohibited practice has been determined to have been committed in connection with a Commercial Driver's License (CDL) application which involves interstate criminal activity.

October 2014



Department of Licensing Facial Recognition Matching System Annual Report

Under RCW 46.20.0371, the Department of Licensing is required to submit a report to the Governor and the legislature on investigations based on Facial Recognition Matching System (FRMS) results and related data during the previous fiscal year by October 1 of each year. This report is for the fiscal year beginning on July 1, 2013.

Item	Number
1. Total number of potential matches identified by FRMS	185,314
2. Investigations initiated by the department due to FRMS	1,208 ^A
3. Determinations that a person committed a prohibited practice under RCW 46.20.0921	907 ^B
4. Informal administrative review requested	62
5. Determinations confirmed by informal review	54
6. Determinations that were overturned by an informal review	6
7. Formal hearings requested	9
8. Determinations that were confirmed by a hearings examiner	8
9. Determinations that were overturned by a hearings examiner	1
10. Number of cases where a person declined an informal review or hearing or did not attend a scheduled informal interview or hearing	189
11. Number of determinations that were referred to law enforcement	9 ^C

^A All 185,314 potential matches were visually inspected by DOL staff. The vast majority of potential matches were found to be false matches and no further investigation was done. Further investigation was initiated where matches were confirmed to be the same person. *It is important to note that this number represents potential matches that the system returns. None of them are considered to be fraud simply because they are returned as potential matches.*

Many of the confirmed matches were determined not to involve fraud. For example, a person formerly licensed in Washington state may have moved to another state and legally changed their name due to marriage or other circumstances. Upon later returning to Washington, the person may have applied for a license under their new name and simply neglected to notify DOL of an existing record under a previous name.

Statistics for the number of confirmed matches that required further investigation but did not result in a determination that a person committed a prohibited practice under RCW 46.20.0921 were collected from October 2013 through June 30, 2014.

Department of Licensing Facial Recognition Matching System Annual Report

Disposition of prohibited practices

^B Of the 907 cases where it was determined that a prohibited practice was committed, 258 resulted in a driver's license suspension. The remaining 649 were not recommended for suspension at this time for one of the following reasons:

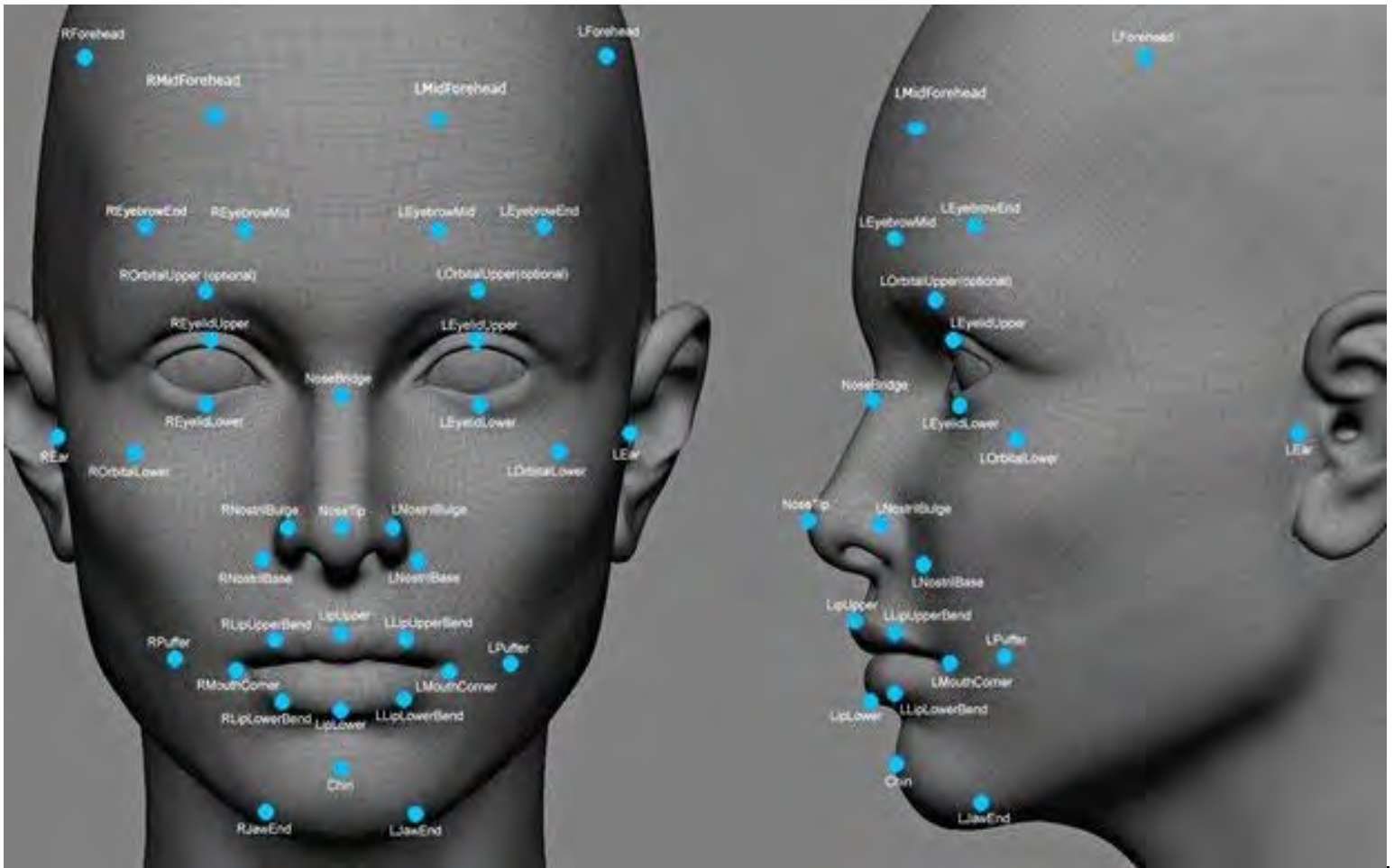
- **Identicard fraud** - DOL does not have the authority to take suspension action against a person who commits a prohibited practice relating to Identicards. In lieu of suspension action, a formal notice was mailed to the person requiring that the person submit additional documentation proving identity. Failure to prove identity resulted in the cancellation of the Identicard.
- **The prohibited practice occurred more than 6 years ago** - The statute of limitations for criminal prosecution in a case involving a prohibited practice is six years. Under that basis, DOL does not actively pursue administrative action in a case that is more than six years old.
- **Habitual Traffic Offenders (HTO)** - Since the driving privileges of a person who has been determined to be an HTO (Revoked in the First Degree) are revoked for several years, investigators complete an abbreviated case to document the prohibited practice, but do not recommend further suspension action. The records are combined under the person's true name and noted as such. This provides a notation on the record that an alias exists.
- **21-year old age-related cases** - if the prohibited practice occurred as a result of a person under the age of 21 attempting to obtain an identity document misrepresenting the person's age, DOL generally prevents the document from being produced and issued when possible, and sends a letter to the person requiring the person to return the temporary document, or permanent document if it has already been mailed, within 15 days. If the person fails to respond within the 15 days, an investigative report is completed and appropriate administrative action follows.
- **Unable to identify** - If DOL is unable to identify the true identity for the person the document is cancelled rather than suspended.
- **Backlog** - 456 of the 649 fraud cases identified have not been assigned to an investigator at this time as a result of a backlog of cases.

^C Nine determinations that a prohibited practice occurred as a result of facial recognition were forwarded to Washington State Patrol (WSP) for law enforcement action.

In all cases where it is determined that a prohibited practice was committed involving an Enhanced Driver's License or Identicard (EDL/ID), the cases are forwarded to law enforcement. For cases that do not involve an EDL/ID, the following criteria are used to determine whether a specific case should be forwarded to a law enforcement agency:

- Generally two or more identifiable identity theft victims. WSP may pursue charges if there is only one victim, provided there is financial loss.
- Identity theft has occurred within last 6 years where a written application has been submitted.
- A prohibited practice has been determined to have been committed in connection with a Commercial Driver's License (CDL) application which involves interstate criminal activity.

October 2015



Department of Licensing Facial Recognition Matching System Annual Report

Under RCW 46.20.0371, the Department of Licensing is required to submit a report to the Governor and the legislature on investigations based on Facial Recognition Matching System (FRMS) results and related data during the previous fiscal year by October 1 of each year. This report is for the fiscal year beginning on July 1, 2014.

Item	Number
1. Total number of potential matches identified by FRMS	236,820
2. Investigations initiated by the department due to FRMS	1,183 ^A
3. Determinations that a person committed a prohibited practice under RCW 46.20.0921	705 ^B
4. Informal administrative review requested	39
5. Determinations confirmed by informal review	35
6. Determinations that were overturned by an informal review	1
7. Formal hearings requested	8
8. Determinations that were confirmed by a hearings examiner	7
9. Determinations that were overturned by a hearings examiner	0
10. Number of cases where a person declined an informal review or hearing or did not attend a scheduled informal interview or hearing	95
11. Number of determinations that were referred to law enforcement	10 ^C

^A All 236,820 potential matches were visually inspected by DOL staff. The vast majority of potential matches were found to be false matches and no further investigation was done. Further investigation was initiated where matches were confirmed to be the same person. *It is important to note that this number represents potential matches that the system returns. None of them are considered to be fraud simply because they are returned as potential matches.*

Many of the confirmed matches were determined not to involve fraud. For example, a person formerly licensed in Washington State may have moved to another state and legally changed their name due to marriage or other circumstances. Upon later returning to Washington, the person may have applied for a license under their new name and simply neglected to notify DOL of an existing record under a previous name.

Disposition of prohibited practices

^B Of the 705 cases where it was determined that a prohibited practice was committed, 144 resulted in a driver's license suspension. The remaining 561 were not recommended for suspension at this time for one of the following reasons:

- **Identicard fraud** - DOL does not have the authority to take suspension action against a person who commits a prohibited practice relating to Identicards. In lieu of suspension action, a formal notice was mailed to the person requiring that the person submit additional

Department of Licensing Facial Recognition Matching System Annual Report

documentation proving identity. Failure to prove identity resulted in the cancellation of the Identicard.

- **The prohibited practice occurred more than 6 years ago** – The statute of limitations for criminal prosecution in a case involving a prohibited practice is six years. Under that basis, DOL does not actively pursue administrative action in a case that is more than six years old.
- **Habitual Traffic Offenders (HTO)** – Since the driving privileges of a person who has been determined to be an HTO (Revoked in the First Degree) are revoked for several years, investigators complete an abbreviated case to document the prohibited practice, but do not recommend further suspension action. The records are combined under the person's true name and noted as such. This provides a notation on the record that an alias exists.
- **21-year old age-related cases** – if the prohibited practice occurred as a result of a person under the age of 21 attempting to obtain an identity document misrepresenting the person's age, DOL generally prevents the document from being produced and issued when possible, and sends a letter to the person requiring the person to return the temporary document, or permanent document if it has already been mailed, within 15 days. If the person fails to respond within the 15 days, an investigative report is completed and appropriate administrative action follows.
- **Unable to identify** – If DOL is unable to identify the true identity for the person the document is cancelled rather than suspended.
- **Backlog** – 354 of the 561 fraud cases identified have not been assigned to an investigator at this time as a result of a backlog of cases.

^c Ten determinations that a prohibited practice occurred as a result of facial recognition were forwarded to Washington State Patrol (WSP) for law enforcement action.

In all cases where it is determined that a prohibited practice was committed involving an Enhanced Driver's License or Identicard (EDL/ID), the cases are forwarded to law enforcement. For cases that do not involve an EDL/ID, the following criteria are used to determine whether a specific case should be forwarded to a law enforcement agency:

- Generally two or more identifiable identity theft victims. WSP may pursue charges if there is only one victim, provided there is financial loss.
- Identity theft has occurred within last 6 years where a written application has been submitted.
- A prohibited practice has been determined to have been committed in connection with a Commercial Driver's License (CDL) application which involves interstate criminal activity.

2016

Facial Recognition Matching System Annual Report

OCTOBER 2016

Facial Recognition Matching System Annual Report

Under RCW 46.20.0371, the Department of Licensing is required to submit a report to the Governor and the legislature on investigations based on Facial Recognition Matching System (FRMS) results and related data during the previous fiscal year by October 1 of each year. This report is for the fiscal year beginning on July 1, 2015.

Item	Number
1. Total number of potential matches identified by FRMS	270,834
2. Investigations initiated by the department due to FRMS	1,035 ⁱ
3. Determinations that a person committed a prohibited practice under RCW 46.20.0921	269 ⁱⁱ
4. Informal administrative review requested	60
5. Determinations confirmed by informal review	50
6. Determinations that were overturned by an informal review	7
7. Formal hearings requested	8
8. Determinations that were confirmed by a hearings examiner	7
9. Determinations that were overturned by a hearings examiner	0
10. Number of cases where a person declined an informal review or hearing or did not attend a scheduled informal interview or hearing	97
11. Number of determinations that were referred to law enforcement	6 ⁱⁱⁱ

ⁱ All 270,834 potential matches were visually inspected by DOL staff. The vast majority of potential matches were found to be false matches and no further investigation was done. Further investigation was initiated where matches were confirmed to be the same person. *It is important to note that this number represents potential matches that the system returns. None of them are considered to be fraud simply because they are returned as potential matches.*

Many of the confirmed matches were determined not to involve fraud. For example, a person formerly licensed in Washington State may have moved to another state and legally changed their name due to marriage or other circumstances. Upon later returning to Washington, the person may have applied for a license under their new name and simply neglected to notify DOL of an existing record under a previous name.

Disposition of prohibited practices

ⁱⁱ Of the 269 cases where it was determined that a prohibited practice was committed, 154 resulted in a driver's license suspension. The remaining 115 were not recommended for suspension at this time for one of the following reasons:

- **Identicard fraud** – DOL does not have the authority to take suspension action against a person who commits a prohibited practice relating to Identicards. In lieu of suspension action, a formal notice was mailed to the person that the person submit additional documentation proving identity. Failure to prove identity resulted in the cancellation of the Identicard.

- **The prohibited practice occurred more than 6 years ago** – The statute of limitations for criminal prosecution in a case involving a prohibited practice is six years. Under that basis, DOL does not have actively pursue administrative action in a case that is more than six years old.
- **Habitual Traffic Offenders (HTO)** – Since the driving privileges of a person who has been determined to be an HTO (Revoked in the First Degree) are revoked for several years, investigators complete an abbreviated case to document the prohibited practice, but do not recommend further suspension action. The records are combined under the person's true name and noted as such. This provides a notation on the record that an alias exists.
- **21-year old age-related cases** – if the prohibited practice occurred as a result of a person under the age of 21 attempting to obtain an identity document misrepresenting the person's age, DOL generally prevents the document from being produced and issued when possible, and sends a letter to the person requiring the person to return the temporary document, or permanent document if it has already been mailed, within 15 days. If the person fails to respond within the 15 days, an investigative report is completed and appropriate administrative action follows.
- **Unable to identify** – If DOL is unable to identify the true identity for the person the document is cancelled rather than suspended.
- **Backlog** – 52 of the 115 fraud cases identified have not been assigned to an investigator at this time as a result of a backlog of cases.

iii Six determinations that a prohibited practice occurred as a result of facial recognition were forwarded to Washington State Patrol (WSP) for law enforcement action.

In all cases where it is determined that a prohibited practice was committed involving an Enhanced Driver's License or Identicard (EDL/ID), the cases are forwarded to law enforcement. For cases that do not involve an EDL/ID, the following criteria are used to determine whether a specific case should be forwarded to a law enforcement agency:

- Generally two or more identifiable identity theft victims. WSP may pursue charges if there is only one victim, provided there is financial loss.
- Identity theft has occurred within last 6 years where a written application has been submitted.
- A prohibited practice has been determined to have been committed in connection with a Commercial Driver's License (CDL) application which involves interstate criminal activity.

LIU



**LICENSE
INTEGRITY UNIT**

LIU Staff



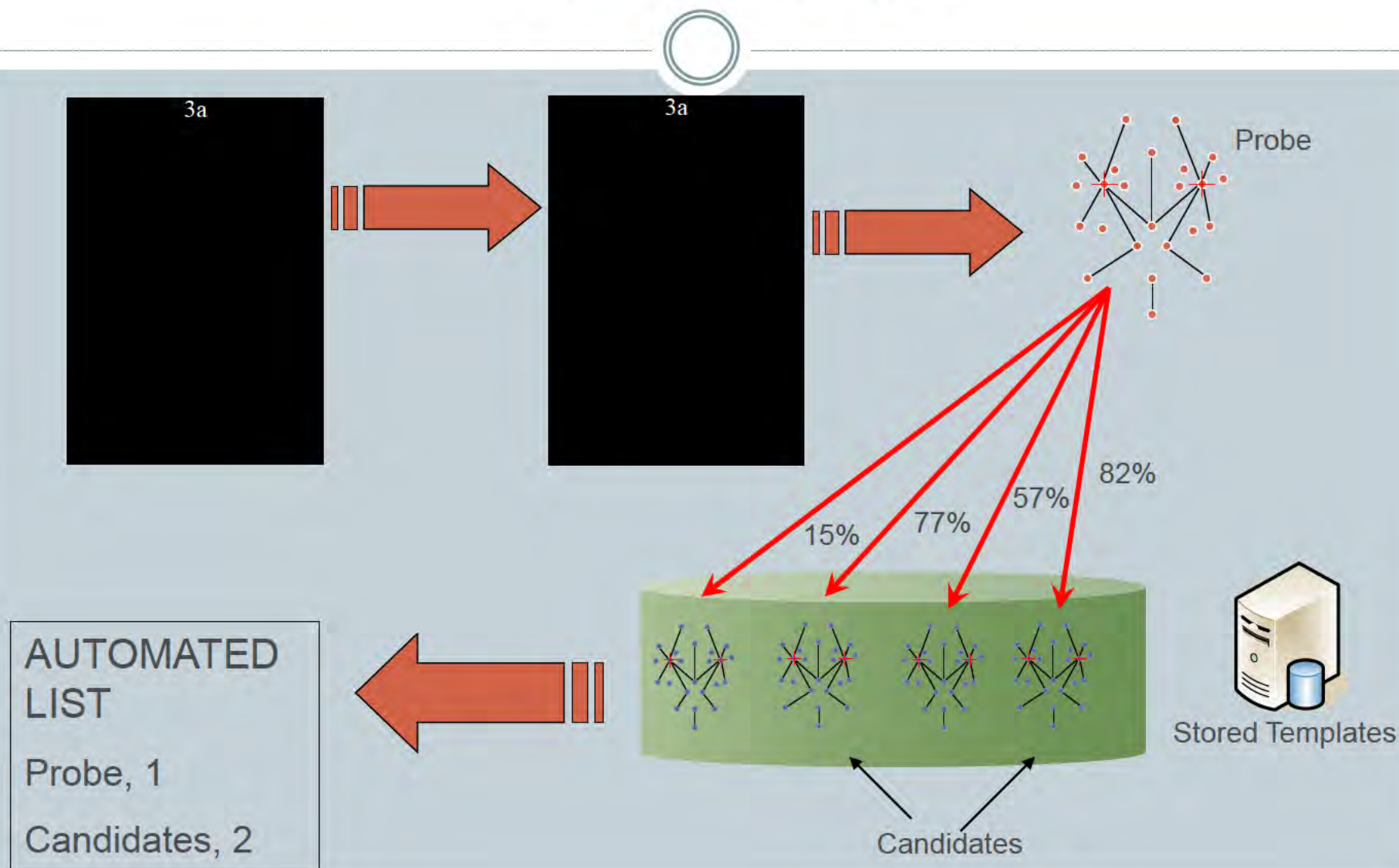
- Administrator, Mike Turcott
- Two Supervisors
- Two Support Enforcement Technicians
- Three Investigator 2's
 - One EDL Investigator
 - Two Vehicle Investigators
- 10 Investigator 1's

Facial Recognition System



- DOL has used FRS since December of 2007 for enhanced customers. For non enhanced customers, a pilot project was conducted from October 2010- June 2011. The agency was given the authority to conduct FRS reviews for all customers in June of 2012.
- Each day, investigators review an average of 600 potential matches.
- DOL did a “Scrub” of their system in 2007 when FRS was implemented, that scrub resulted in 4 million potential matches. Of those, LIU has approximately 245,000 records remaining to review.

How it works



Vocabulary



- The following terms are associated with FRS:
 - **Facial Recognition:** a computer application designed to identify potential matches based on a computer algorithm
 - **Template:** a numerical representation of a facial structure used for fast comparison
 - **Probe:** the template to be compared against the database images
 - **Candidate:** a template that matches the probe within set probability limits
 - **Matching Threshold:** the percentage of probable match to the probe that defines a candidate

Why does DOL use FRS?



- Provides an investigative process to review the photos and determine if a fraud occurred.
- To verify the identity of an applicant or holder of a driver's license.
- To verify the identity of a permit, or identicard.
- To determine whether the person has been issued a driver's license, permit, or identicard under a different name or names.
- To have 1 person on 1 record with 1 identity.

Where do LIU's Fraud cases originate?



- FRS
- Internal referral (LSR, Out of State Unit, Record Response Unit, etc)
- External agency referral (LE, courts, DMV)
- Victim allegation
- Anonymous tip

Criteria for Priority Assignment



Regardless of the type of case, if it involves:

- A victim
- Three or more identities
- Habitual Traffic Offender (HTO)
- One of the records has a suspended status
- Law enforcement/outside referral
- A 21 year old
- ID card fraud – no driver licenses issued on any of the records involved

Motives of identity fraud



- DUI
- Suspended for other reasons (child support, tickets, failure to appear)
- Identity Theft
- Theft of Public Assistance (DSHS, L&I)
- Theft of SSA benefits
- False claim of US citizenship
- 21 for entry into bars
- Criminal Record

FRS RCW



RCW 46.20.037 – Facial Recognition Matching system

- (1) The department may implement a facial recognition matching system for drivers' licenses, permits, and identicards. Any facial recognition matching system selected by the department must be used only to verify the identity of an applicant for or holder of a driver's license, permit, or identicard to determine whether the person has been issued a driver's license, permit, or identicard under a different name or names.
- (2) Any facial recognition matching system selected by the department must be capable of highly accurate matching, and must be compliant with appropriate standards established by the American association of motor vehicle administrators that exist on June 7, 2012, or such subsequent date as may be provided by the department by rule, consistent with the purposes of this section.
- (3) The department shall post notices in conspicuous locations at all department driver licensing offices, make written information available to all applicants at department driver licensing offices, and provide information on the department's web site regarding the facial recognition matching system. The notices, written information, and information on the web site must address how the facial recognition matching system works, all ways in which the department may use results from the facial recognition matching system, how an investigation based on results from the facial recognition matching system would be conducted, and a person's right to appeal any determinations made under this chapter.
 - (4) Results from the facial recognition matching system:
 - (a) Are not available for public inspection and copying under chapter [42.56](#) RCW;
 - (b) May only be disclosed when authorized by a court order;
 - (c) May only be disclosed to a federal government agency if specifically required under federal law; and
 - (d) May only be disclosed by the department to a government agency, including a court or law enforcement agency, for use in carrying out its functions if the department has determined that person has committed one of the prohibited practices listed in RCW [46.20.0021](#) and this determination has been confirmed by a hearings examiner under this chapter or the person declined a hearing or did not attend a scheduled hearing.
 - (5) All personally identifying information derived from the facial recognition matching system must be stored with appropriate security safeguards. The office of the chief information officer shall develop the appropriate security standards for the department's use of the facial recognition matching system, subject to approval and oversight by the technology services board.
 - (6) The department shall develop procedures to handle instances in which the facial recognition matching system fails to verify the identity of an applicant for a renewal or duplicate driver's license, permit, or identicard. These procedures must allow an applicant to prove identity without using the facial recognition matching system.

- **Authorizes DOL's use**
- **Governs release to outside entities**

Helpful Information for Court Order/Search Warrant



- For our purposes, the court order should indicate what type of photo you're providing i.e. electronic, preexisting DOL photo, etc., that you want ran through FRS. Be sure to include the electronic image or WA DL/IP/ID card information (PIC number) for the subject.
- For the court's purposes, we've seen the below wording:
 - *your name/agency requests that the court order be authorized for the purpose of conducting a Facial Recognition query with WA State Dept of Licensing. This query should be used to identify any WA State driver license, instruction permit, identification card images that are similar to the individual pictured in provide information here in accordance with RCW 46.20.037. It is further requested that the information gathered be shared from the Facial Recognition query with your name, therefore, allowing the use and disclosure of the facial recognition matching system in the above cited case per court order.*
- Often times the court order needs location information, so for your reference – the FRS system is housed at 1125 Washington ST SE Olympia WA 98507 in the Highways and Licenses Building and is operated by License Integrity Unit staff, Attn: JoAnna Shanafelt or Ashley Palmer. If you want to fax the court order to us, you can at 360-570-1246 or you can email it to fraud@dol.wa.gov and it will be forwarded to us.

Image Upload



- Allows photos to be uploaded into FRS for biometric matches to WA DOL photos
- DOL requires a court order signed by a judge to process a government agency's image upload request (court, federal agency, law enforcement)
- Only .BMP, .JPG, or .PNG are valid file types for image uploads
- Photo must be a straight on image of subject's face
- Quality of image will affect the results populated

Photo examples



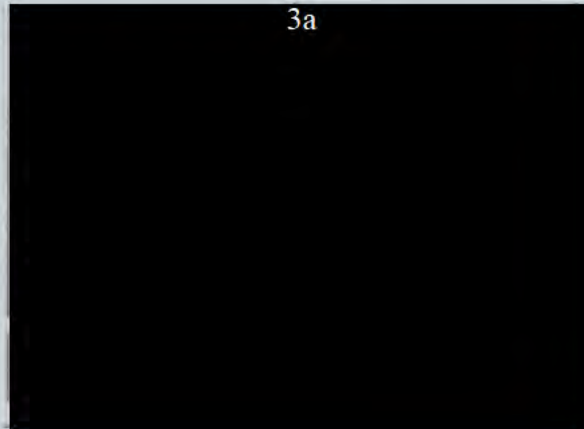
○

CA DL PHOTO



3a

BOOKING PHOTO



3a

WA BLACK AND WHITE



3a

INVESTIGATE



Min % for candidate match, can be adjusted

Number can be adjusted by investigator

Home

New Investigation

Image Upload

Automated List

Common List

Personal List

Scrub List

Record Details

3a

Image Title: CA BOOKING PHOTO

Description:

Max Candidates: 30 ▾

Min Threshold: 70 ▾

Create Dossier

Investigate

Back to List

Click here to start investigation

Image Upload



Possible
matches

Complete Investigation

Save Progress

Clear Changes

Print Gallery

Make Common

Probe Details

Candidates

3a

MATCH

Ctrl #:

PIC:

First Name:

MI:

Last Name:

DOB:

Class:

Uploaded

CA BOOKING PHOTO

Uploaded
image

Notes

Score: 74.23

Score: 74.08

Score: 73.95

Score: 73.76

3a

020230F0924

131502F0957

053237D1310

041488J1340

ESPINO 21500

ATACAM 29409

Score: 73.75

Score: 73.73

Score: 73.64

Score: 73.63

3a

Is LIU able to forward investigations?



- Upon return from Imaging, investigation will be forwarded to SETs to document on LE spreadsheet.
- Spreadsheet is forwarded to specific LE agencies for persual.
- Upon request from WSP ITU or any other LE agency and after confirming with administrator, an investigation can be forwarded to assist LE.
- DOL can also release the investigations after due process expires.

LICENSE INTEGRITY UNIT



- **QUESTIONS????**

CONTACT INFORMATION



- Mailing address:
PO BOX 9029
Olympia, WA 98507
(360) 902-3915
- Email: fraud@dol.wa.gov
- <http://www.dol.wa.gov/driverslicense/externallawenforcement.html>

LIU



**LICENSE
INTEGRITY UNIT**

LIU Staff



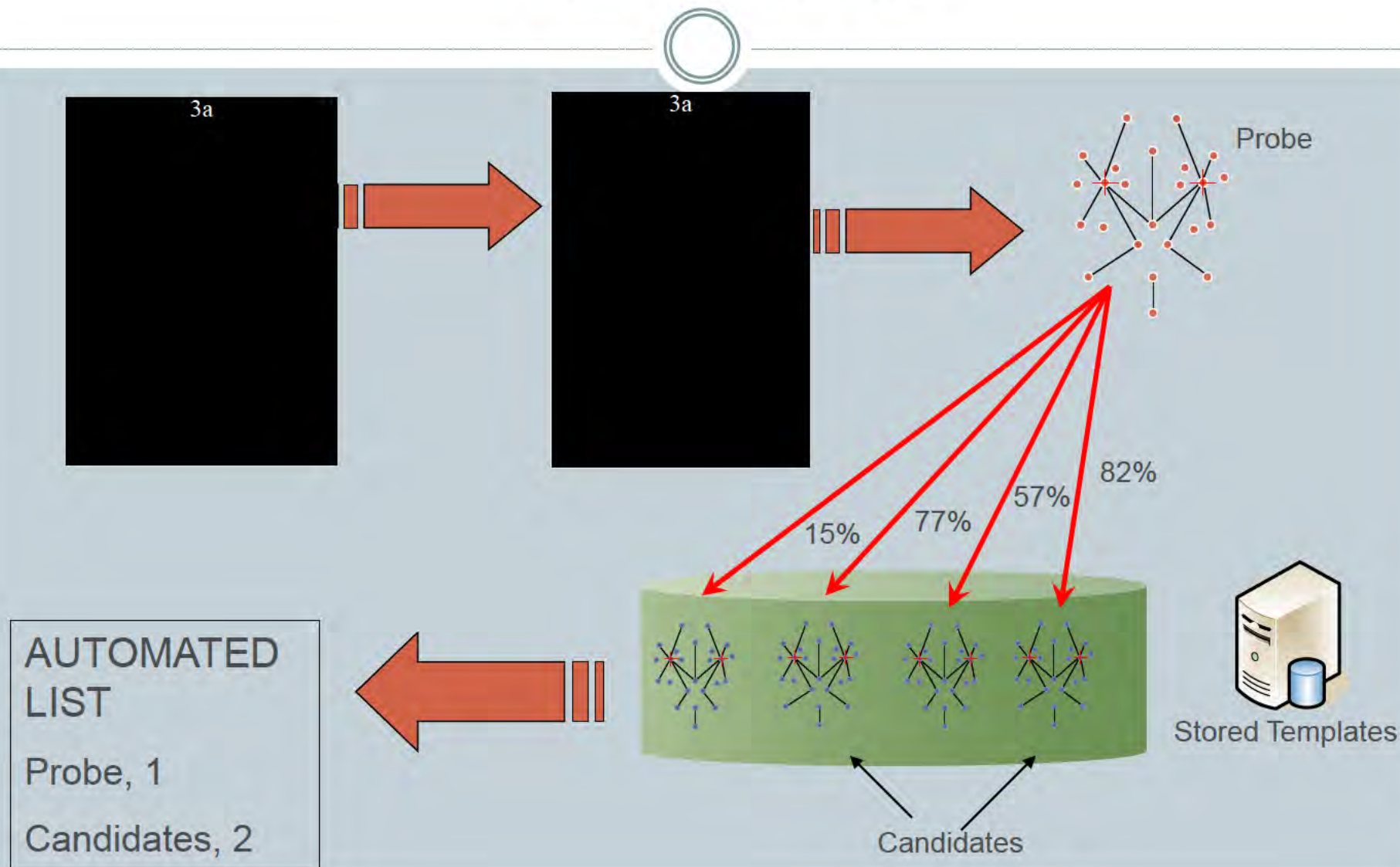
- Administrator, Mike Turcott
- Two Supervisors
- Two Support Enforcement Technicians
- Four Investigator 2's
 - Two EDL Investigators (One Lead EDL Investigator)
 - Two Vehicle Investigators
- 10 Investigator 1's

Facial Recognition System (FRS)



- DOL began using the FRS since January 2008 for customers applying for an enhanced document.
- DOL did a “Scrub” of their system when FRS was implemented in December 2007. The scrub resulted in 4 million cases of potential matches. Since then, LIU now has approximately 234,000 records remaining to review.
- For non enhanced customers, a pilot project was conducted from October 2010- June 2011. The agency was given the authority to conduct FRS reviews for all customers in June of 2012.
- Each day, investigators review an average of 600 cases for potential matches.

How it works



Vocabulary



- The following terms are associated with FRS:
 - **Facial Recognition:** a computer application designed to identify potential matches based on a computer algorithm
 - **Template:** a numerical representation of a facial structure used for fast comparison
 - **Probe:** the template used to compare against the other stored templates in the Central Image Server.
 - **Candidate:** a template that likely matches the probe within set probability limits
 - **Matching Threshold:** the percentage of probable match to the probe that defines a candidate

Why does DOL use FRS?



- It is an investigative tool that gives an investigator the basic information they need to make an assessment of a potential match.
- To determine whether the person has been issued a driver's license, permit, or identicard under a different name or names.
- To ensure 1 person has 1 record under 1 identity.
- Allows for data clean up. i.e name changes/customers who go out of state and return to WA under a different name.

Where do LIU's Fraud cases originate?



- FRS (Daily automated and FRS Scrub)
- Internal referral (LSR, Out of State Unit, Record Response Unit, etc)
- External agency referral (LE, courts, DMV)
- Victim allegation
- Anonymous tip

Criteria for Priority Assignment



Regardless of the type of case, if it involves:

- A victim
- Three or more identities
- Habitual Traffic Offender (HTO)
- One of the records has a suspended status
- Law enforcement/outside referral
- A 21 year old
- ID card fraud – no driver licenses issued on any of the records involved

Motives of identity fraud



- DUI
- Suspended for other reasons (child support, tickets, failure to appear)
- Identity Theft
- Theft of Public Assistance (DSHS, L&I)
- Theft of SSA benefits
- False claim of US citizenship
- 21 for entry into bars
- Criminal Record

FRS RCW



RCW 46.20.037 – Facial Recognition Matching system

- (1) The department may implement a facial recognition matching system for drivers' licenses, permits, and identicards. Any facial recognition matching system selected by the department must be used only to verify the identity of an applicant for or holder of a driver's license, permit, or identicard to determine whether the person has been issued a driver's license, permit, or identicard under a different name or names.
- (2) Any facial recognition matching system selected by the department must be capable of highly accurate matching, and must be compliant with appropriate standards established by the American association of motor vehicle administrators that exist on June 7, 2012, or such subsequent date as may be provided by the department by rule, consistent with the purposes of this section.
- (3) The department shall post notices in conspicuous locations at all department driver licensing offices, make written information available to all applicants at department driver licensing offices, and provide information on the department's web site regarding the facial recognition matching system. The notices, written information, and information on the web site must address how the facial recognition matching system works, all ways in which the department may use results from the facial recognition matching system, how an investigation based on results from the facial recognition matching system would be conducted, and a person's right to appeal any determinations made under this chapter.
 - (4) Results from the facial recognition matching system:
 - (a) Are not available for public inspection and copying under chapter [42.56](#) RCW;
 - (b) May only be disclosed when authorized by a court order;
 - (c) May only be disclosed to a federal government agency if specifically required under federal law; and
 - (d) May only be disclosed by the department to a government agency, including a court or law enforcement agency, for use in carrying out its functions if the department has determined that person has committed one of the prohibited practices listed in RCW [46.20.0021](#) and this determination has been confirmed by a hearings examiner under this chapter or the person declined a hearing or did not attend a scheduled hearing.
 - (5) All personally identifying information derived from the facial recognition matching system must be stored with appropriate security safeguards. The office of the chief information officer shall develop the appropriate security standards for the department's use of the facial recognition matching system, subject to approval and oversight by the technology services board.
 - (6) The department shall develop procedures to handle instances in which the facial recognition matching system fails to verify the identity of an applicant for a renewal or duplicate driver's license, permit, or identicard. These procedures must allow an applicant to prove identity without using the facial recognition matching system.

- **Authorizes DOL's use**
- **Governs release to outside entities**

Helpful Information for Court Order/Search Warrant



- For our purposes, the court order should indicate what type of photo you're providing i.e. electronic, preexisting DOL photo, etc., that you want ran through FRS. Be sure to include the electronic image or WA DL/IP/ID card information (PIC number) for the subject.
- For the court's purposes, we've seen the below wording:
 - *your name/agency requests that the court order be authorized for the purpose of conducting a Facial Recognition query with WA State Dept of Licensing. This query should be used to identify any WA State driver license, instruction permit, identification card images that are similar to the individual pictured in provide information here in accordance with RCW 46.20.037. It is further requested that the information gathered be shared from the Facial Recognition query with your name, therefore, allowing the use and disclosure of the facial recognition matching system in the above cited case per court order.*
- Often times the court order needs location information, so for your reference – the FRS system is housed at 1125 Washington ST SE Olympia WA 98507 in the Highways and Licenses Building and is operated by License Integrity Unit staff, Attn: JoAnna Shanafelt or Ashley Palmer. If you want to fax the court order to us, you can at 360-570-1246 or you can email it to fraud@dol.wa.gov and it will be forwarded to us.

Image Upload

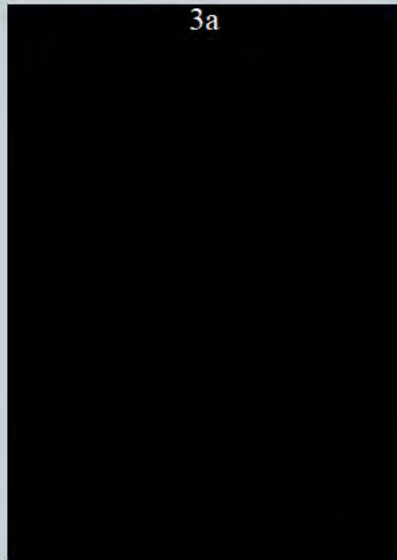


- Allows photos to be uploaded into FRS for biometric matches to WA DOL photos
- DOL requires a court order signed by a judge to process a government agency's image upload request (court, federal agency, law enforcement)
- Only .BMP, .JPG, or .PNG are valid file types for image uploads
- Photo must be a straight on image of subject's face
- Quality of image will affect the results populated

Photo examples



CA DL PHOTO



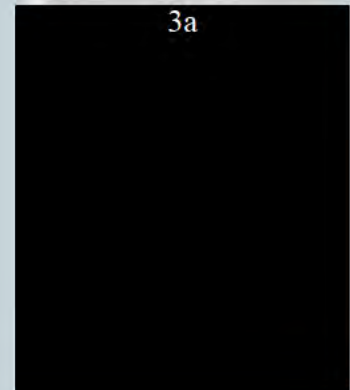
3a

BOOKING PHOTO



3a

WA BLACK AND WHITE



3a

INVESTIGATE



Min % for candidate match, can be adjusted

Number can be adjusted by investigator

Home

New Investigation

Image Upload

Automated List

Common List

Personal List

Scrub List

Record Details

3a

Image Title: CA BOOKING PHOTO

Description:

Max Candidates: 30 ▾

Min Threshold: 70 ▾

Create Dossier

Investigate

Back to List

Click here to start investigation

Image Upload



Possible matches

Complete Investigation

Save Progress

Clear Changes

Print Gallery

Make Common

Probe Details

Candidates

3a

MATCH

Ctrl #:

PIC:

First Name:

MI:

Last Name:

DOB:

Class:

Uploaded

CA BOOKING PHOTO

Uploaded
image

Notes

Score: 74.23

Score: 74.08

Score: 73.95

Score: 73.76

3a

02022F0524

131502F0957

053237D1310

041488J1340

ESPINO 21500

ATACAM 29409

Score: 73.75

Score: 73.73

Score: 73.64

Score: 73.63

3a

After LIU conducts an investigation, what next?



- DOL takes administrative suspension and cancellation action as necessary.
- All closed cases are added to a spreadsheet and sent monthly to WSP, Department of State, Department of Labor and Industries, Department of Social and Health Services, Health and Human Services, as well as Social Security Administration for review.
- If cases merit criminal consideration, they are forwarded to WSP, Identity Theft Unit for review.
- Upon request from any law enforcement agency a copy of a closed case where due process has already occurred can be provided.

LICENSE INTEGRITY UNIT



- **QUESTIONS????**

CONTACT INFORMATION



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LIU



**LICENSE
INTEGRITY UNIT**

LIU Staff



- Administrator, Mike Turcott
- Two Supervisors
- Two Support Enforcement Technicians
- Four Investigator 2's
 - Two EDL Investigators (One Lead EDL Investigator)
 - Two Vehicle Investigators
- 10 Investigator 1's

Facial Recognition System (FRS)



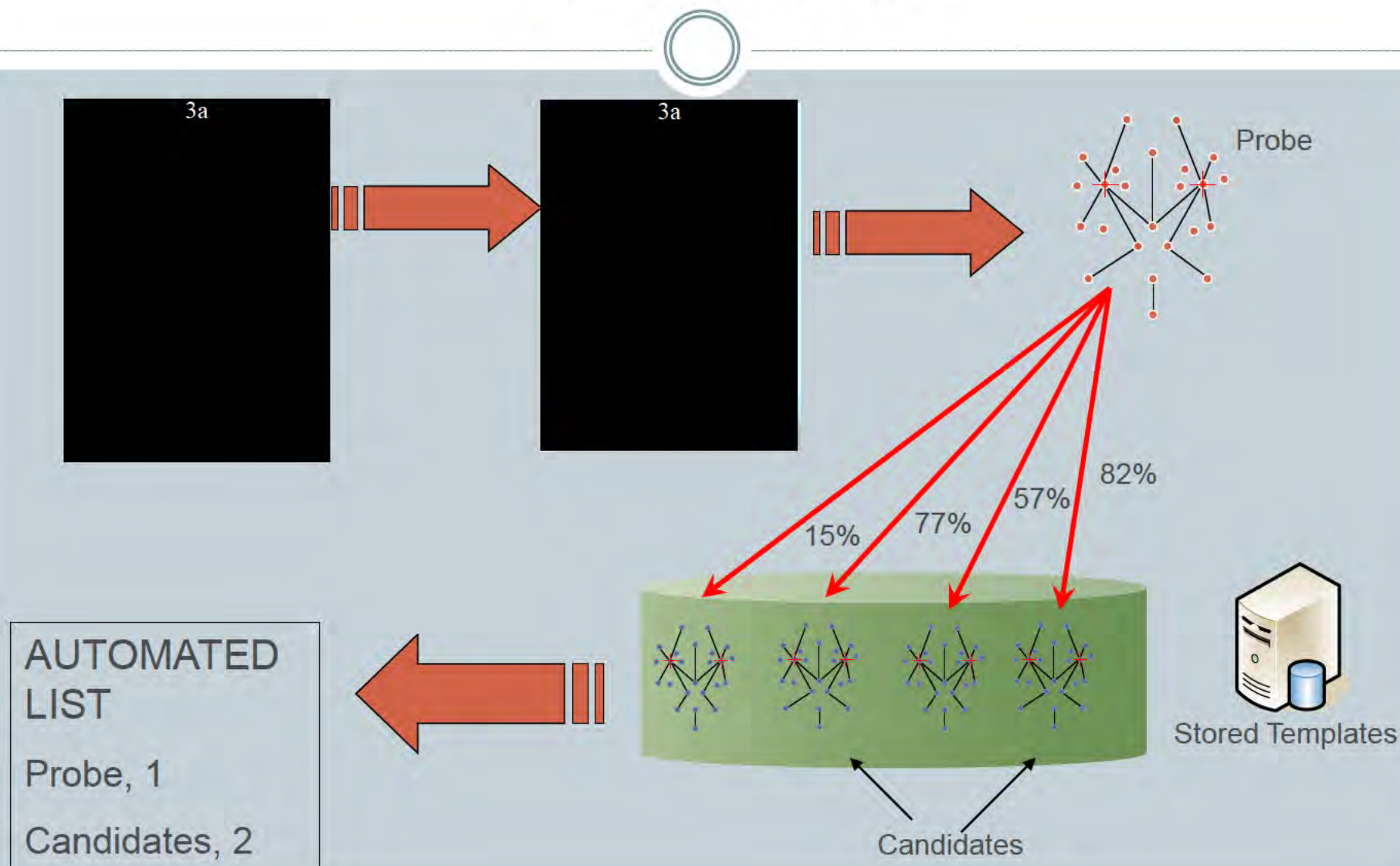
- DOL began using the FRS since January 2008 for customers applying for an enhanced document.
- DOL did a “Scrub” of their system when FRS was implemented in December 2007. The scrub resulted in 4 million cases of potential matches. Since then, LIU now has approximately 234,000 records remaining to review.
- For non enhanced customers, a pilot project was conducted from October 2010- June 2011. The agency was given the authority to conduct FRS reviews for all customers in June of 2012.
- Each day, investigators review an average of 600 cases for potential matches.

Vocabulary



- The following terms are associated with FRS:
 - **Facial Recognition:** a computer application designed to identify potential matches based on a computer algorithm
 - **Template:** a numerical representation of a facial structure used for fast comparison
 - **Probe:** the template used to compare against the other stored templates in the Central Image Server.
 - **Candidate:** a template that likely matches the probe within set probability limits
 - **Matching Threshold:** the percentage of probable match to the probe that defines a candidate

How it works



Why does DOL use FRS?



- It is an investigative tool that gives an investigator the basic information they need to make an assessment of a potential match.
- To determine whether the person has been issued a driver's license, permit, or identicard under a different name or names.
- To ensure 1 person has 1 record under 1 identity.
- Allows for data clean up. i.e. due to a name change a customer was issued a DL out of state and returned to WA under a different name.

Where do LIU's Fraud cases originate?



- FRS (Daily automated and FRS Scrub)
- Internal referral (LSR, Out of State Unit, Record Response Unit, etc)
- External agency referral (LE, courts, DMV)
- Victim allegation
- Anonymous tip

Criteria for Priority Assignment



Regardless of the type of case, if it involves:

- A victim
- Three or more identities
- Habitual Traffic Offender (HTO)
- One of the records has a suspended status
- Law enforcement/outside referral
- A 21 year old
- ID card fraud – no driver licenses issued on any of the records involved

Motives of identity fraud



- DUI
- Suspended for other reasons (child support, tickets, failure to appear)
- Identity Theft
- Theft of Public Assistance (DSHS, L&I)
- Theft of SSA benefits
- False claim of US citizenship
- 21 for entry into bars
- Criminal Record

RCW's



- RCW 46.20.0921 – Violations and penalty

- 1a-1f

Most commonly cited by LIU

1e : It is a misdemeanor for any person - To use a false or fictitious name in any application for a driver's license or identicard or to knowingly make a false statement or to knowingly conceal a material fact or otherwise commit a fraud in any such application

- RCW 46.20.037 – Facial Recognition Matching system

- Authorizes DOL's use

- Governs release to outside entities

INVESTIGATIVE ISSUES



- If a response is not recorded on an application for issuance, the system is programmed to interpret that response as “no.”
 - LIU therefore does not rely heavily on the yes/no fields of the application. *I.e. Have you had a driver license before? Are you a twin or triplet?*
- The Social Security Online Verification System is not perfect. The SSOLV system will return a match for a similar name and date of birth. LIU’s practice was to contact the Social Security Administration and verify the match, however, effective April 2013, SSA quit providing that service for DOL.
 - LIU therefore has no way of knowing if the match on record is a true match for the exact name and dob on DOL’s files.
- DOL does not require documents presented for proof of identity to be scanned and maintained in a DOL database (with the exception of enhanced customers).
 - LIU has no way of knowing if those documents were presented or if the corresponding certificate numbers were entered correctly, and relies heavily on the Licensing Service Representatives data entry and issuance integrity.
- LIU views each issuance as an application, whether or not an actual application was filled out at time of issuance. However, there is debate concerning the term “application.”
 - LIU has received AAG interpretation in the past which is consistent with our business practice.
- LIU investigators are not law enforcement.
 - As a result, items such as booking photos may be difficult to obtain.
- LIU does not have reliable tools to accurately identify the true identity of the subject, especially, when they have multiple aliases.
 - LIU typically goes off of first issued, Department of Homeland Security information, documents provided as proof of identity and customer statements.
- DOL does not have a statute of limitations relating to administrative action for fraud.
 - If fraud has not occurred in over six years, LIU will not proceed with administrative action.
 - When law enforcement is forwarded cases or inquires about past cases, our cases may not be relevant as they are passed the criminal statute of limitations.
- Outside agencies do not always have an interest in our cases.
 - SSA – if SSN’s are already cross-referenced or customer is not receiving dual benefits.
 - DSHS/L&I – if customer is entitled to benefits, DSHS is not concerned the identity they are receiving benefits under.

Frequently Asked Questions



How does LIU differentiate between twins?

- LIU compares:
- Photographs (moles, scars, distinct marks, facial features)
- Signatures
- Drive Record
- Office used
- Dates issued
- Twin/Triplet indicator on application

Why does FRS not differentiate between race and gender?

- FRS is designed to map points on the face and create a template of that mapping, race and gender are not factors in mapping.

Why are cases not immediately assigned to an investigator?

- LIU has a backlog of 3,800 FRS related cases
 - 1,729 of those are daily automated cases 2,071 of those are scrub cases

Why does LIU recommend 364 day suspension for every fraud case?

- In 2008, LIU Administrator implemented the 364 day suspension for all fraud cases for consistency purposes.

Why was the threshold in FRS set at a certain threshold?

- The threshold has changed over the years as the business needs have changed based on staffing levels and numbers of frauds identified. In 2007, when LIU started doing FRS on enhanced customers the threshold was set at 72% and the threshold has increased over the years. The current daily and scrub threshold is set at 74.1% which seems to catch the majority of our frauds.

Why does LIU not conduct in person interviews on every case?

- LIU does not conduct in person interviews in every case for a number of factors: time, safety, coordination efforts, many of the respondents admit to fraud and provide a statement to that fact, and the case has already been proven beyond a preponderance of evidence that fraud has occurred.

Levels of Review



- Identify fraud
- Forward information, including photos, to supervisor for review
- Supervisor reviews and assigns to an investigator to investigate
- Investigator assigned case for further review and possible administrative action
- Case is peer-reviewed, reviewed by the lead investigator II, and then reviewed and approved by the supervisor before final signature and approval of administrative action

After LIU conducts an investigation, what next?



- DOL takes administrative suspension and cancellation action as necessary.
- All closed cases are added to a spreadsheet and sent monthly to WSP, Department of State, Department of Labor and Industries, Department of Social and Health Services, Health and Human Services, as well as Social Security Administration for review.
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CONTACT INFORMATION



- Mailing address:
PO BOX 9029
Olympia, WA 98507
(360) 902-3915 (Message Line)
Fax (360) 570-1246

JoAnna Shanafelt, Investigator IV
(360) 902-3715
jshanafelt@dol.wa.gov

Ashley Palmer, Investigator III
(360) 902-3702
apalmer@dol.wa.gov

- Email: fraud@dol.wa.gov
- <http://www.dol.wa.gov/driverslicense/identitycrimes.html>

LICENSE INTEGRITY UNIT



- **QUESTIONS????**

License Integrity Unit

Identity Theft Victim Response



WASHINGTON STATE DEPARTMENT OF
LICENSING



LIU Staff

- Administrator
- Two Supervisors
- Three Investigator 2's
 - One EDL Investigator
 - Two Vehicle Investigators
- Ten Investigator 1's
- Two Support Enforcement Technicians

Facial Recognition System

- Used since December 2007 for EDL customers
- Pilot project for non-EDL customers October 2010-June 2011.
- FRS used for all issuances since June 2012.
 - RCW 46.20.037
- Average of 750 daily automated FRS reviews.
- Approximately 246,000 records remaining to review in the FRS scrub database.

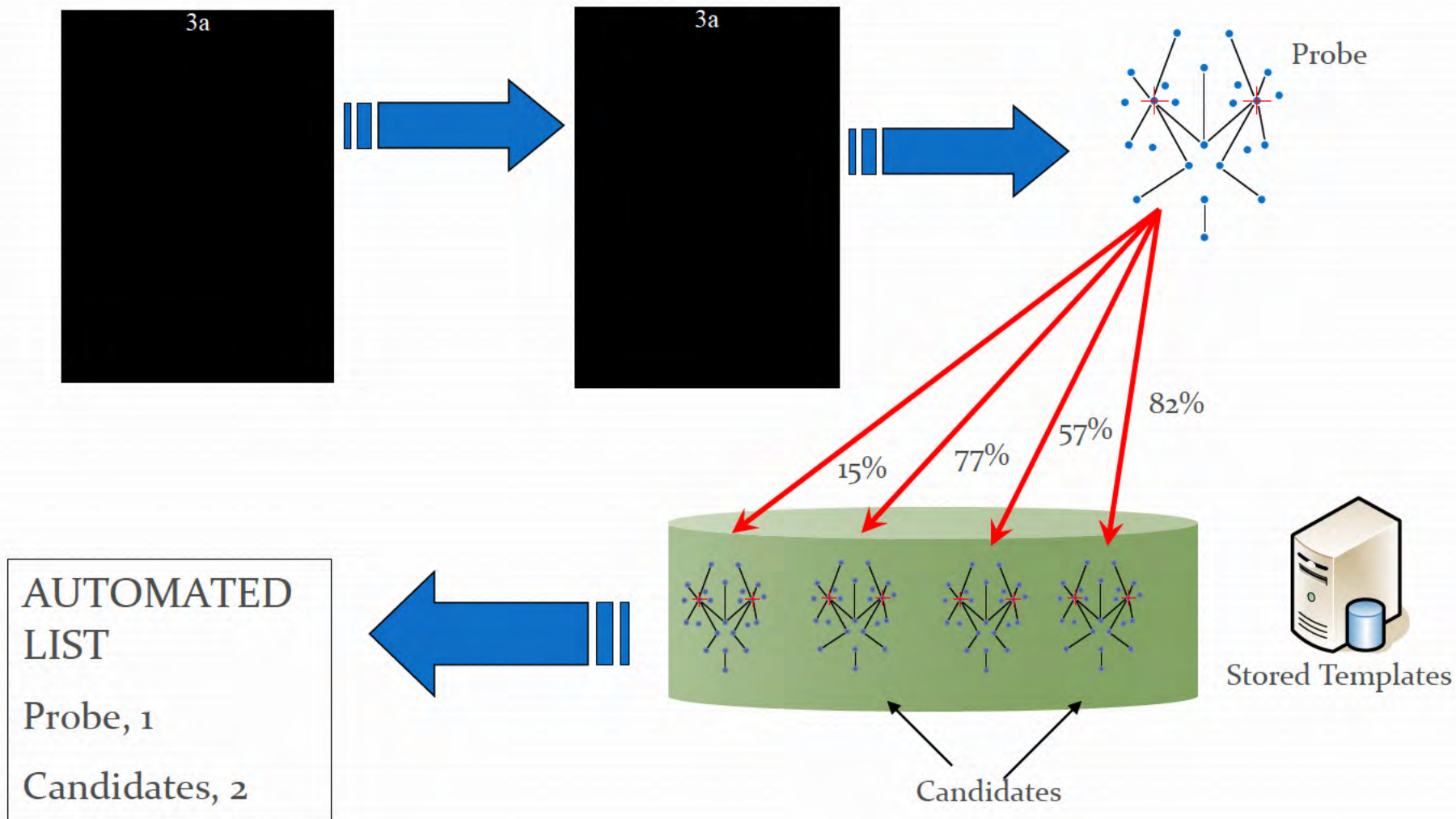
Vocabulary

- **Facial Recognition:** a computer application designed to identify potential matches based on a computer algorithm
- **Identify Theft:** When someone steals your personal information and uses it without your permission.

Motives for identity fraud

- DUI
- Suspended for other reasons (child support, tickets, failure to appear)
- Identity Theft
- Theft of Public Assistance (DSHS, L&I)
- Theft of SSA benefits
- False claim of US citizenship
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- Criminal Record

How it works



Criteria for Priority Assignment

Regardless of the type of case, if it involves:

- A victim
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Where do LIU's Fraud cases originate?

- FRS daily automated
- FRS scrub
- Internal referral (LSR, Out of State Unit, Record Response Unit, etc)
- External agency referral (LE, courts, DMV)
- Victim allegation
- Anonymous tip

Procedure

- RECEIVE REQUEST/INQUIRY-EXAMPLES INCLUDE:
 - a. Request to flag record
 - b. Inquiry on obtaining new number of alternate pic
 - c. Inquiry on potential fraud on record.

ASSESS SITUATION WHILE REVIEWING RECORD

License Integrity Unit

Contact Info

(360) 902-3915

(360) 902-1246 fax

fraud@dol.wa.gov

LIU



**LICENSE
INTEGRITY UNIT**

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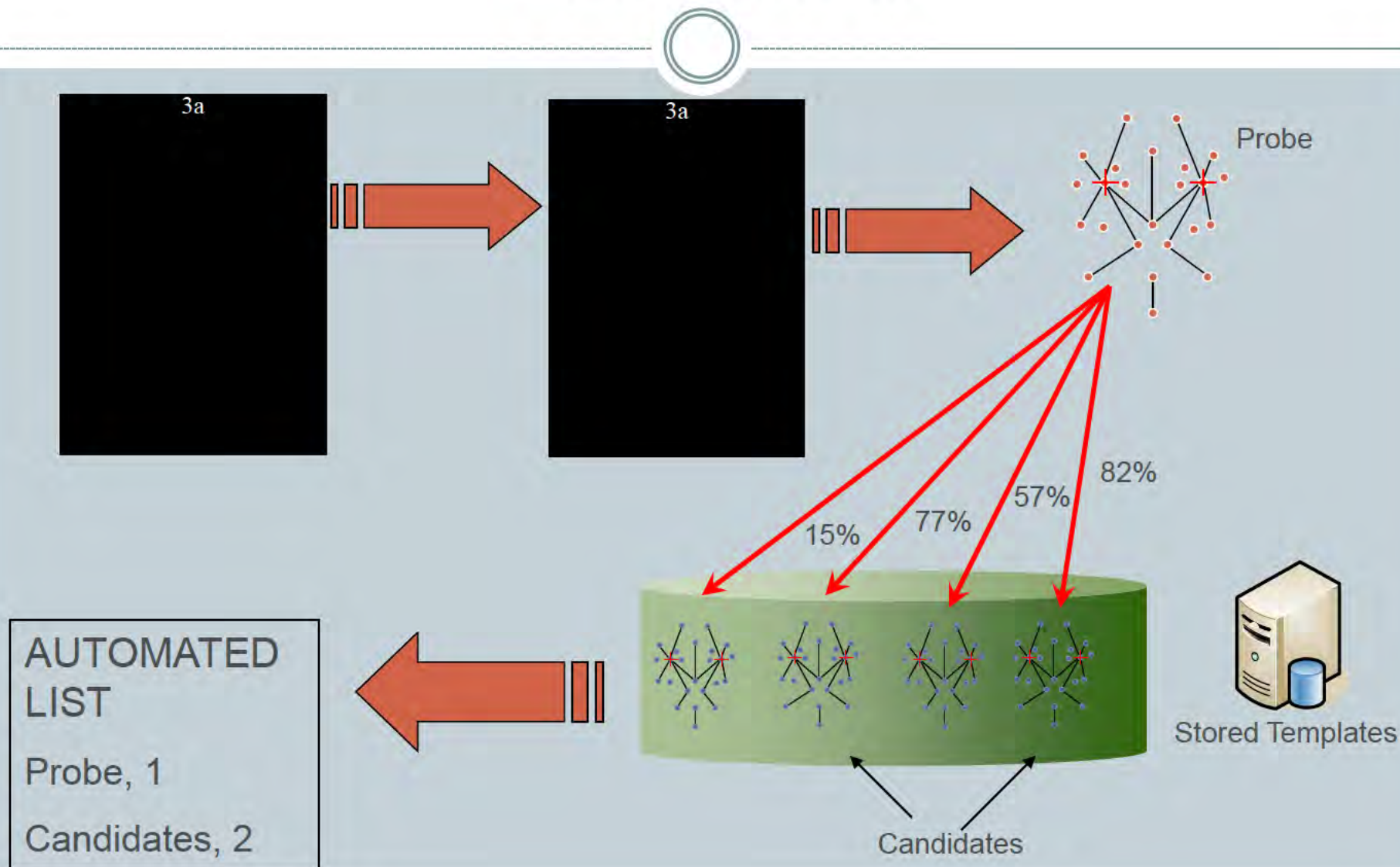
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- FRS has been used by DOL since December of 2007 for enhanced customers. For non enhanced customers, a pilot project was conducted from October 2010- June 2011. The agency was given the authority to conduct FRS reviews for all customers in June of 2012.
- Since January of 2013, LIU has conducted over 103,600 daily automated FRS reviews.
- LIU has approximately 270,000 records remaining to review in the FRS scrub database.

How it works



Daily Automated Reviews vs. Scrub Reviews



Daily Automated Reviews

- Issuances are “live”
- Temporary/permanent denials
- Comments added to record
- Formal Notices mailed at time of discovery
- Case file created for investigation
- Added to backlog of cases or assigned dependant on priority level

Scrub Reviews

- Photos are old (prev. issuances)
- No denials
- Comments not added to record; only on in house database
 - Unless record is up for renewal within 6 months
- Formal Notices mailed at time of discovery
- Moved to Common List
- Non-priority cases

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FRS RCW



- **RCW 46.20.037 – Facial Recognition Matching system**

- (1) The department may implement a facial recognition matching system for drivers' licenses, permits, and identicards. Any facial recognition matching system selected by the department must be used only to verify the identity of an applicant for or holder of a driver's license, permit, or identicard to determine whether the person has been issued a driver's license, permit, or identicard under a different name or names.

(2) Any facial recognition matching system selected by the department must be capable of highly accurate matching, and must be compliant with appropriate standards established by the American association of motor vehicle administrators that exist on June 7, 2012, or such subsequent date as may be provided by the department by rule, consistent with the purposes of this section.

(3) The department shall post notices in conspicuous locations at all department driver licensing offices, make written information available to all applicants at department driver licensing offices, and provide information on the department's web site regarding the facial recognition matching system. The notices, written information, and information on the web site must address how the facial recognition matching system works, all ways in which the department may use results from the facial recognition matching system, how an investigation based on results from the facial recognition matching system would be conducted, and a person's right to appeal any determinations made under this chapter.

(4) Results from the facial recognition matching system:

(a) Are not available for public inspection and copying under chapter [42.56](#) RCW;

(b) May only be disclosed when authorized by a court order;

(c) May only be disclosed to a federal government agency if specifically required under federal law; and

(d) May only be disclosed by the department to a government agency, including a court or law enforcement agency, for use in carrying out its functions if the department has determined that person has committed one of the prohibited practices listed in RCW [46.20.0921](#) and this determination has been confirmed by a hearings examiner under this chapter or the person declined a hearing or did not attend a scheduled hearing.

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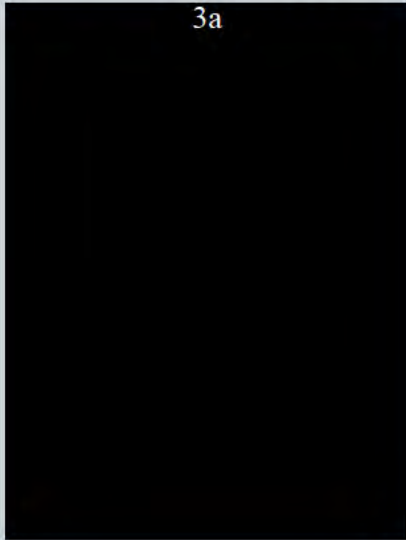
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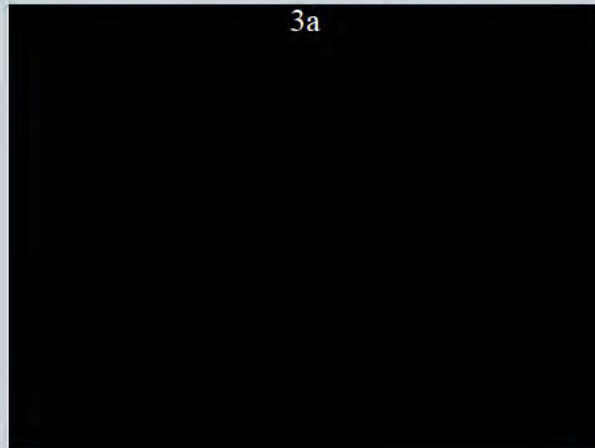
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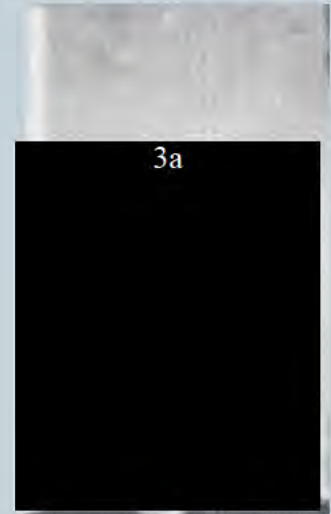
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Ctrl #:
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Score: 74.23

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020232E0924
FIGUECL319KQ
CELESTINO L FIGUEROA

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053237D1310
ESPINO 21500
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041488J1340
ATAZARI 29409
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Score: 73.75

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What kind of action is LIU authorized to take?

- Administrative action only

LICENSE INTEGRITY UNIT



- **QUESTIONS????**

CONTACT INFORMATION



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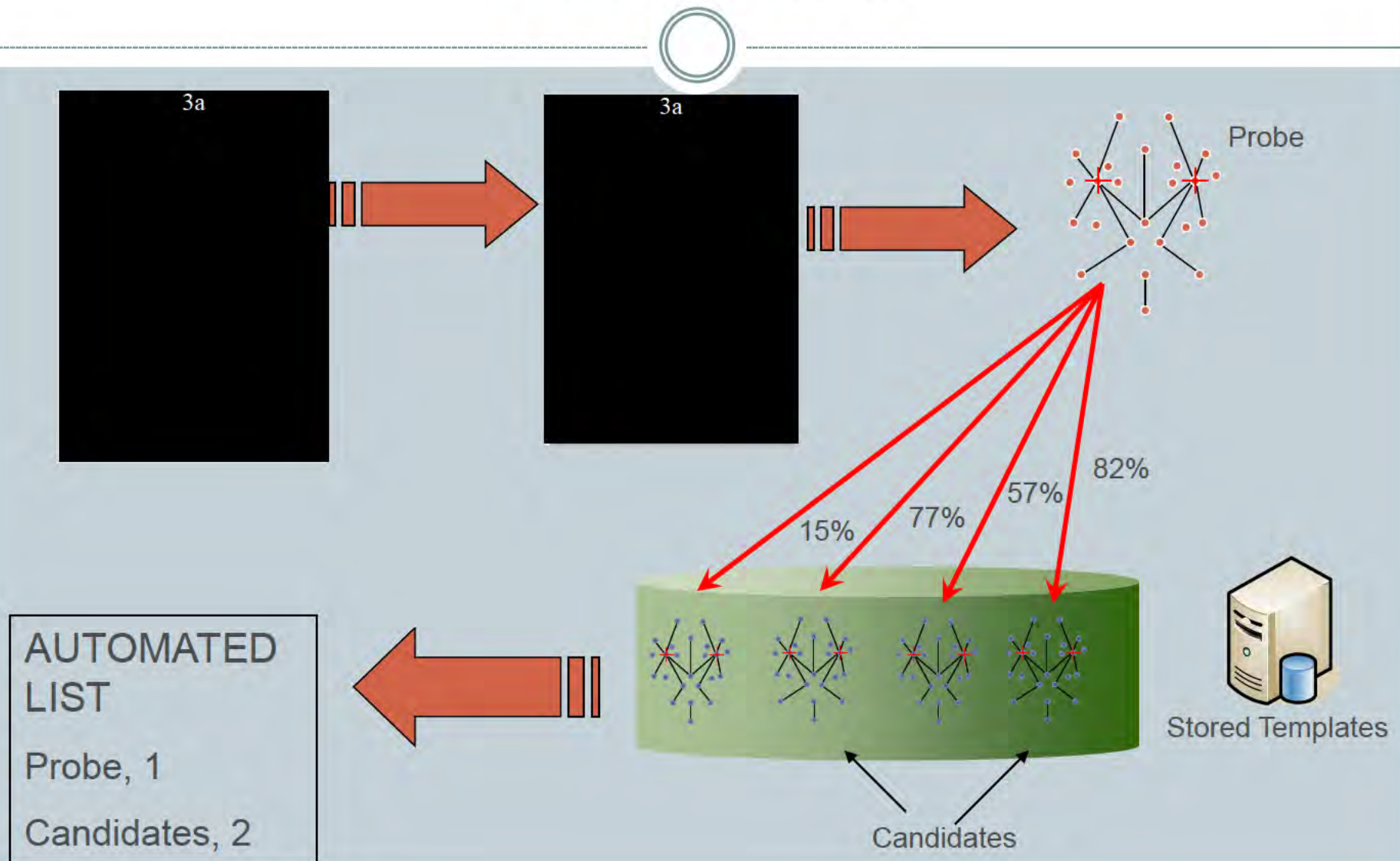
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- (1) The department may implement a facial recognition matching system for drivers' licenses, permits, and identicards. Any facial recognition matching system selected by the department must be used only to verify the identity of an applicant for or holder of a driver's license, permit, or identicard to determine whether the person has been issued a driver's license, permit, or identicard under a different name or names.

(2) Any facial recognition matching system selected by the department must be capable of highly accurate matching, and must be compliant with appropriate standards established by the American association of motor vehicle administrators that exist on June 7, 2012, or such subsequent date as may be provided by the department by rule, consistent with the purposes of this section.

(3) The department shall post notices in conspicuous locations at all department driver licensing offices, make written information available to all applicants at department driver licensing offices, and provide information on the department's web site regarding the facial recognition matching system. The notices, written information, and information on the web site must address how the facial recognition matching system works, all ways in which the department may use results from the facial recognition matching system, how an investigation based on results from the facial recognition matching system would be conducted, and a person's right to appeal any determinations made under this chapter.

(4) Results from the facial recognition matching system:

(a) Are not available for public inspection and copying under chapter [42.56](#) RCW;

(b) May only be disclosed when authorized by a court order;

(c) May only be disclosed to a federal government agency if specifically required under federal law; and

(d) May only be disclosed by the department to a government agency, including a court or law enforcement agency, for use in carrying out its functions if the department has determined that person has committed one of the prohibited practices listed in RCW [46.20.0921](#) and this determination has been confirmed by a hearings examiner under this chapter or the person declined a hearing or did not attend a scheduled hearing.

(5) All personally identifying information derived from the facial recognition matching system must be stored with appropriate security safeguards. The office of the chief information officer shall develop the appropriate security standards for the department's use of the facial recognition matching system, subject to approval and oversight by the technology services board.

(6) The department shall develop procedures to handle instances in which the facial recognition matching system fails to verify the identity of an applicant for a renewal or duplicate driver's license, permit, or identicard. These procedures must allow an applicant to prove identity without using the facial recognition matching system.

- **Authorizes DOL's use**
- **Governs release to outside entities**

Helpful Information for Court Order



- For our purposes, the court order should indicate what type of photo you're providing i.e. electronic, preexisting DOL photo, etc., that you want ran through FRS. Be sure to include the electronic image or WA DL/IP/ID card information (PIC number) for the subject.
- For the court's purposes, we've seen the below wording:
 - *your name/agency requests that the court order be authorized for the purpose of conducting a Facial Recognition query with WA State Dept of Licensing. This query should be used to identify any WA State driver license, instruction permit, identification card images that are similar to the individual pictured in provide information here in accordance with RCW 46.20.037. It is further requested that the information gathered be shared from the Facial Recognition query with your name, therefore, allowing the use and disclosure of the facial recognition matching system in the above cited case per court order.*
- Often times the court order needs location information, so for your reference – the FRS system is housed at 1125 Washington ST SE Olympia WA 98507 in the Highways and Licenses Building and is operated by License Integrity Unit staff, Attn: JoAnna Shanafelt or Ashley Palmer. If you want to fax the court order to us, you can at 360-570-1246 or you can email it to fraud@dol.wa.gov and it will be forwarded to us.

Image Upload



- Allows photos to be uploaded into FRS for biometric matches to WA DOL photos
- DOL requires a court order signed by a judge to process a government agency's image upload request (court, federal agency, law enforcement)
- Only .BMP, .JPG, or .PNG are valid file types for image uploads
- Photo must be a straight on image of subject's face
- Quality of image will affect the results populated

Photo examples

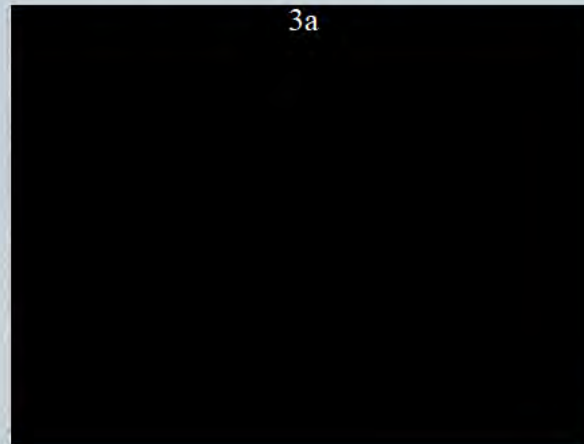


○

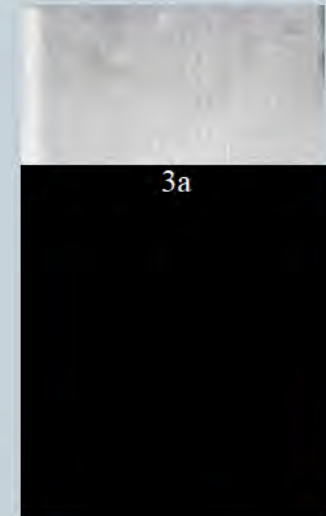
CA DL PHOTO



BOOKING PHOTO



WA BLACK AND WHITE



INVESTIGATE



Min % for candidate match, can be adjusted

Number can be adjusted by investigator

Home

New Investigation

Image Upload

Automated List

Common List

Personal List

Scrub List

Record Details

3a

Image Title: CA BOOKING PHOTO

Description:

Max Candidates: 30 ▾

Min Threshold: 70 ▾

Create Dossier

Investigate

Back to List

Click here to start investigation

Image Upload



Possible
matches

Complete Investigation

Save Progress

Clear Changes

Print Gallery

Make Common

Probe Details

Candidates

3a

MATCH

Ctrl #:

PIC:

First Name:

MI:

Last Name:

DOB:

Class:

Uploaded

CA BOOKING PHOTO

Uploaded
image

Notes

Score: 74.23

Score: 74.08

Score: 73.95

Score: 73.76

3a

0202520924
FIGUECL319KQ
CELESTINO L FIGUEROA

131502F0957
FIGUECL319KQ
CELESTINO L FIGUEROA

053237D1310
ESPINO 21508
[REDACTED]

04148801340
ATAZARI 29409
[REDACTED]

Score: 73.75

Score: 73.73

Score: 73.64

Score: 73.63

3a

Frequently Asked Questions



How does LIU differentiate between twins?

- LIU compares:
- Photographs (moles, scars, distinct marks, facial features)
- Signatures
- Drive Record
- Office used
- Dates issued
- Twin/Triplet indicator on application

Why does FRS not differentiate between race and gender?

- FRS is designed to map points on the face and create a template of that mapping, race and gender are not factors in mapping.

Why was the threshold in FRS set at a certain threshold?

- The threshold has changed over the years as the business needs have changed based on staffing levels and numbers of frauds identified. In 2007, when LIU started doing FRS on enhanced customers the threshold was set at 72% and the threshold has increased over the years. The current daily and scrub threshold is set at 74.1% which seems to catch the majority of our frauds.

What kind of action is LIU authorized to take?

- Administrative action only

LICENSE INTEGRITY UNIT



- **QUESTIONS????**

CONTACT INFORMATION



- Mailing address:
PO BOX 9029
Olympia, WA 98507
(360) 902-3915
- Email: fraud@dol.wa.gov
- <http://www.dol.wa.gov/driverslicense/externallawenforcement.html>

License Integrity Unit

Facial Recognition System



WASHINGTON STATE DEPARTMENT OF
LICENSING



LIU Staff

- Administrator
- Two Supervisors
- Three Investigator 2's
 - One EDL Investigator
 - Two Vehicle Investigators
- Ten Investigator 1's
- Two Support Enforcement Technicians

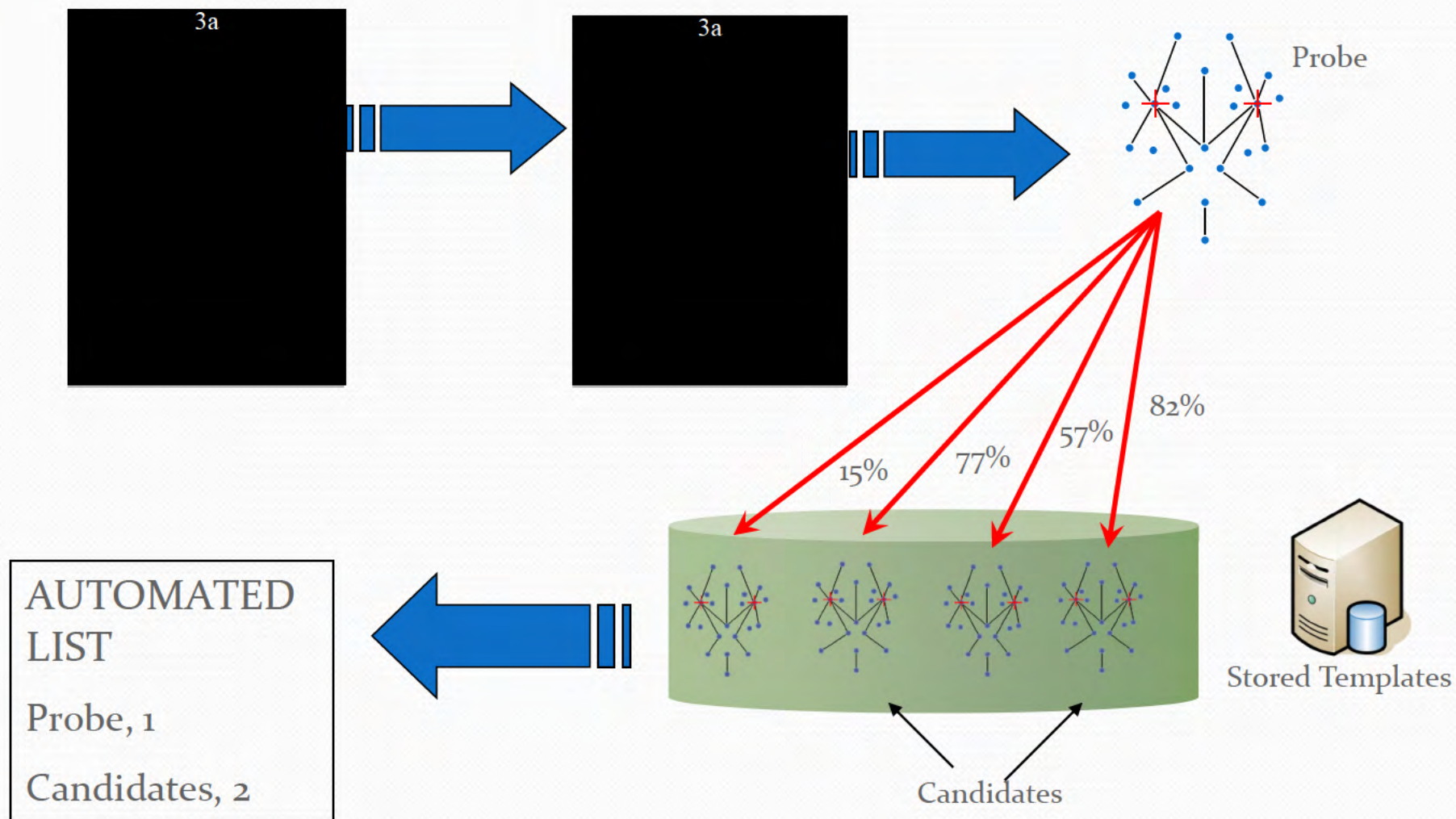
Vocabulary

- **Facial Recognition:** a computer application designed to identify potential matches based on a computer algorithm
- **Template:** a numerical representation of a facial structure used for fast comparison
- **Probe:** the subject template to be compared against the database images
- **Candidate:** a template in the database that matches the probe within set probability limits
- **Matching Threshold:** the percentage of probable match to the probe that defines a candidate
- **Automated List:** a biometric matching system where LIU investigators compare photos of customers to help detect identity fraud
- **Scrub List:** a list of records ran through the “one-to-many” biometric process at different points in time

Facial Recognition System

- Used since December 2007 for EDL customers
- Pilot project for non-EDL customers October 2010-June 2011.
- FRS used for all issuances since June 2012.
 - RCW 46.20.037
- Over 103,600 daily automated FRS reviews since January 2011
- Approximately 265,000 records remaining to review in the FRS scrub database.

How it works



Daily Automated Reviews vs. Scrub Reviews

Daily Automated Reviews

- Issuances are “live”
- Temporary/permanent denials
- Comments added to record
- Formal Notices mailed at time of discovery
- Case file created for investigation
- Added to backlog of cases or assigned dependant on priority level

Scrub Reviews

- Photos are old (prev. issuances)
- No denials
- Comments not added to record; only on in house database
 - Unless record is up for renewal within 6 months
- Formal Notices mailed at time of discovery
- Moved to Common List
- Non-priority cases

Criteria for Priority Assignment

Regardless of the type of case, if it involves:

- A victim
- Three or more identities
- A 21 year old
- ID card fraud – no driver licenses issued on any of the records involved
- Habitual Traffic Offender (HTO)
- Law enforcement/outside referral

Where do LIU's Fraud cases originate?

- FRS daily automated
- FRS scrub
- Internal referral (LSR, Out of State Unit, Record Response Unit, etc)
- External agency referral (LE, courts, DMV)
- Victim allegation
- Anonymous tip

Motives for identity fraud

- DUI
- Suspended for other reasons (child support, tickets, failure to appear)
- Identity Theft
- Theft of Public Assistance (DSHS, L&I)
- Theft of SSA benefits
- False claim of US citizenship
- 21 for entry into bars
- Criminal Record

RCW 46.20.037

- Authorizes Facial Recognition System for fraud detection
- Specifies technical standards (AAMVA) and security safeguards
- Requires notice to applicants warning of FRS scan
- Exempts results from public disclosure
- Limits dissemination to law enforcement



Image Upload

- Allows photos to be uploaded into FRS for biometric matches to WA DOL photos
- RCW 46.20.037 requires a court order to process a government agency's image upload request
- Only .BMP, .JPG, or .PNG are valid file types for image uploads
- Photo must be a straight on image of subject's face
- Quality of image will affect the results populated

Helpful Information for Court Order (Search Warrant)

- Description of evidence sought:

“A facial recognition query to identify any Washington state driver license, instruction permit, or identification card images similar to the individual pictured in the photographs submitted, in accordance with RCW 46.20.037”

- Location of evidence:

Washington Department of Licensing Facial Recognition Database
1125 Washington Street SE
Olympia, WA 98507
Attn: JoAnna Shanafelt or Ashley Palmer

- Helpful to indicate what type of photo you are submitting for FRS search and to include the subject's PIC

INVESTIGATE

The screenshot shows the 'INVESTIGATE' web application interface. At the top is a navigation bar with tabs: Home, New Investigation, Image Upload, Automated List, Common List, Personal List, and Scrub List. The 'Image Upload' tab is currently selected. Below the navigation bar, the main content area is divided into sections. On the left, under 'Record Details', there is a large black rectangular area labeled '3a'. To the right of this, the 'Image Title' is set to 'Test' and the 'Description' field is empty. Further right, there are two adjustable settings: 'Max Candidates' set to 30 and 'Min Threshold' set to 70. Both of these settings have a callout box pointing to them that says 'CAN BE ADJUSTED BY THE INVESTIGATOR'. At the bottom right, there are three buttons: 'Create Dossier', 'Investigate', and 'Back to List'. A callout box labeled 'CLICK HERE TO START INVESTIGATION' points to the 'Investigate' button.

CAN BE ADJUSTED BY THE INVESTIGATOR

CAN BE ADJUSTED BY THE INVESTIGATOR

Home | New Investigation | **Image Upload** | Automated List | Common List | Personal List | Scrub List

Record Details

3a

Image Title: Test

Description:

Max Candidates: 30

Min Threshold: 70

Create Dossier | **Investigate** | Back to List

CLICK HERE TO START INVESTIGATION

Image Upload

Complete Investigation

Save Progress

Clear Changes

Print Gallery

Make Common

Probe Details

Candidates

3a

UPLOADED IMAGE

Ctrl #:
PIC:
First Name:
MI:
Last Name:
DOB:
Class:

Notes

Fraud Status:

Uploaded Test

Score: 73.29

Score: 73.28

Score: 73.19

Score: 73.16

3a

Score: 72.94

Score: 72.91

Score: 72.90

Score: 72.87

3a

IMAGES MEETING THRESHOLD FOR INVESTIGATOR REVIEW FOR POSSIBLE MATCHES



Frequently Asked Questions

How does LIU differentiate between twins?

- Photographs (moles, scars, distinct marks, facial features)
- Signatures
- Drive Record
- Office used
- Dates issued
- Twin/Triplet indicator on application

Why does FRS not differentiate between race and gender?

- The FRS template maps points on the face with no regard to race or gender

How is the FRS matching threshold determined?

- The threshold has been adjusted up to 74.1% based on business needs, staffing levels and numbers of frauds identified.

What kind of action is LIU authorized to take?

- Administrative action only (cancellations and suspensions)

License Integrity Unit

Contact Info

(360) 902-3915

(360) 902-1246 fax

fraud@dol.wa.gov

HANDLING FRAUDS FOUND IN FRS

When you find a possible fraud, go to the “move to” drop down box, select “research” and click on the “move to” button. Note: You may want to write down the PIC before moving or use “cut and paste”, to make it easier to find in the “Cases” tab.

Go to the “Cases” tab and open the record you just moved to “research.” (You may have to filter by PIC or Case ID # to find the record) Use the “assign to” drop down, select your name and click on the “assign to” button. By assigning the case to yourself, another investigator may not make changes or complete your record.

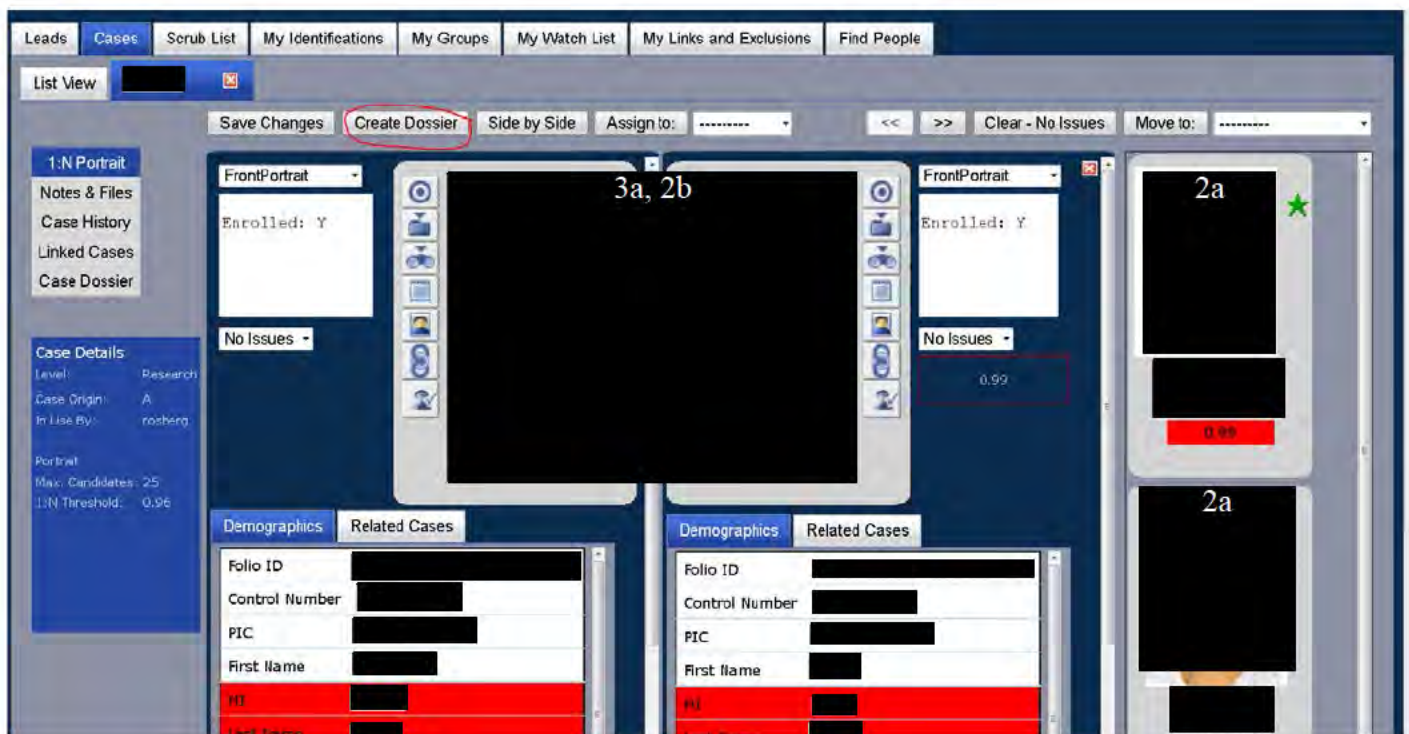
Return to the “Leads” tab and continue your daily processing. When ready to investigate the record further, open the “Cases” tab and open the record assigned to you.

Conduct your research as appropriate, using the Checklist of Daily Automated Reviews and make your entry in the notes by clicking the notepad icon next to your probe photo.

If you determine there is no fraud involved, enter note: no match, click on the “Clear - No Issues.”

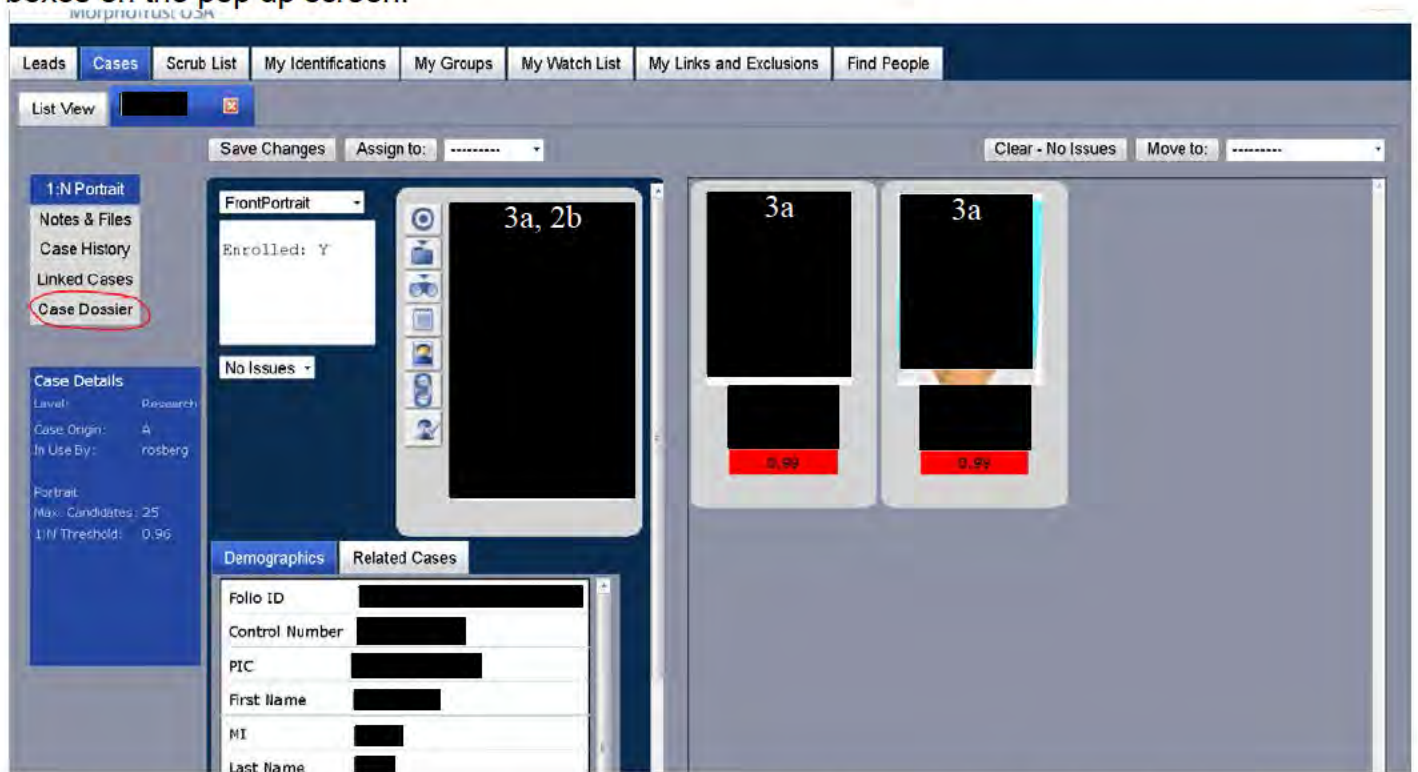
If there is fraud, enter your notes and click on the Candidate photo that corresponds to the fraud involving your probe. Click “Create Dossier” button above the probe picture to generate the photo and notes page to print out for your paper file.

Note: Do not use the “Create Dossier” button beside either photo.



Towards the left side of the screen, click on the “Case Dossier” button to create a view of the entire gallery to print for your case file.

Note: You will need to print two separate dossiers. Select the public notes, and include score boxes on the pop up screen.



If the probe photo is the true identity and OK to send to the customer, "Clear – No Issues."

If you need additional time to determine if there is fraud, email the Lead Investigator II or supervisor and request the issuance be placed on temporary denial. After you have reviewed the record further and determined there was no fraud, send a second email to the Lead Investigator II or supervisor and request the issuance be removed from temporary denial and complete the record in FRS by clicking "Clear – No Issues."

If you determined the record is a fraudulent issuance, send an email to the Lead Investigator II or supervisor, ask the record be changed to permanent denial and follow directions above to create your paper case file.

Check Photo Verification the next day and when it shows "Biometric Fraud", open the record in the "Cases" tab and click, "Clear – No Issues". (Once the biometric fraud is on, the issuance will be stopped by gated issuance and will not be produced or mailed) By clicking on the "Clear – No Issues", the case is removed from an individual investigator's list and shows that the research has been completed.

At this time, LIU is using a limited number of the features in FRS and is not using the case management features.

LIU



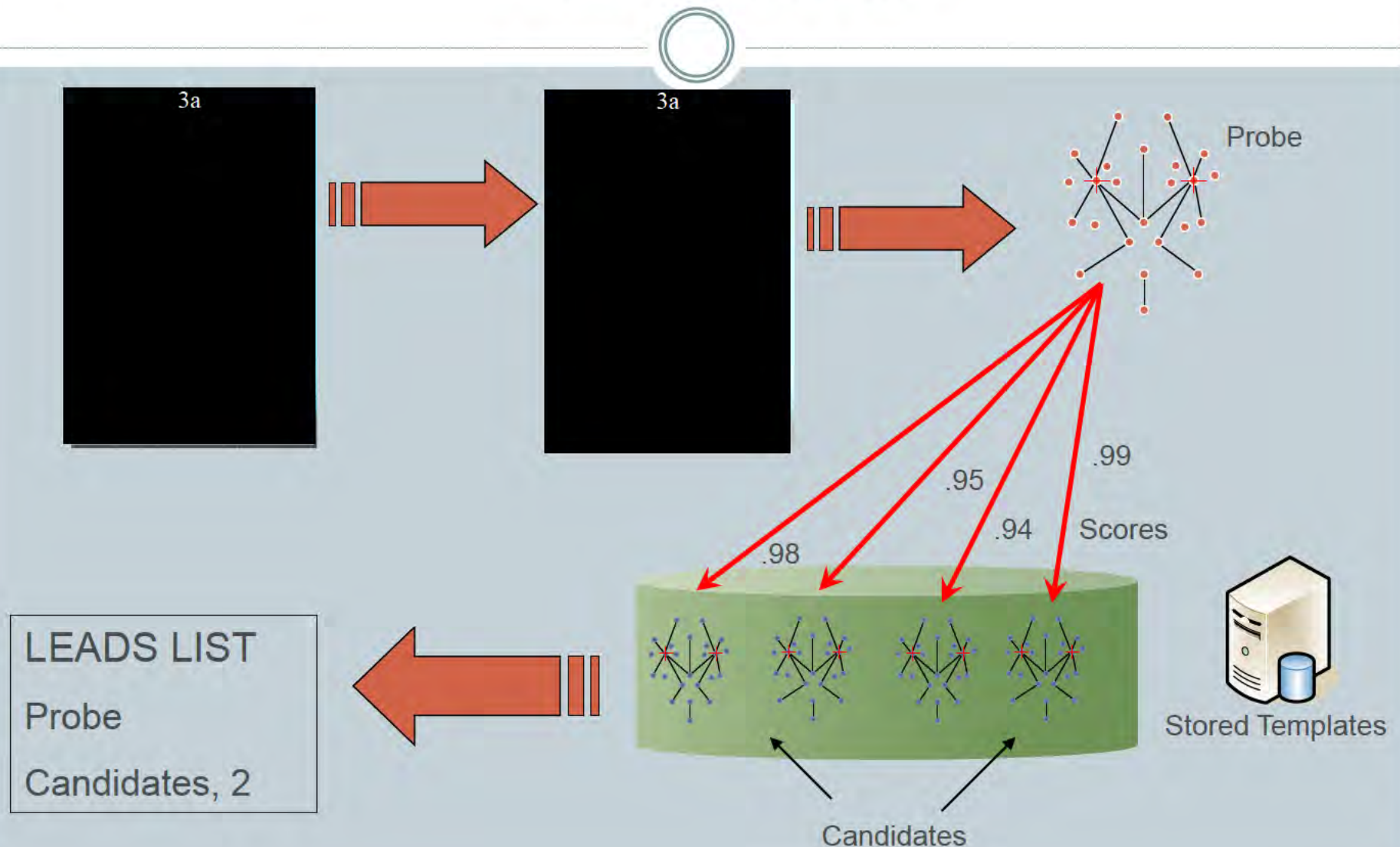
**LICENSE
INTEGRITY UNIT**

LIU Staff



- Administrator, Glenn Ball
- Two Supervisors
- Two Support Enforcement Technicians
- Five Driver/Vehicle Investigator 2's
 - 1 Lead
- 10 Investigator 1's

How it works



Facial Recognition System



- **December 2007:** FRS used on enhanced issuances only.
- **2007:** Scrub of system, resulted 4 million potential matches. Since the scrub, we have gradually worked our way through the reviews of the 4 million records.
- **October 2010-June 2011:** Pilot project on all issuances.
- **June 2012:** DOL given authority to use FRS on all issuances.
- **December 2014:** Received an upgraded system.

Where do LIU's Fraud cases originate?



- FRS
- Internal referral (LSR, Out of State Unit, Record Response Unit, Vehicle Licensing Offices, etc)
- External agency referral (LE, courts, DMV)
- Victim allegation
- Anonymous tip

Criteria for Priority Assignment



- A victim
- Three or more identities
- Habitual Traffic Offender (HTO)
- A suspended/revoked record
- Law enforcement/outside referral
- A 21 year old
- ID card fraud – no driver licenses issued on any of the records involved

This is the result of a 2,700 case backlog.

Motives of identity fraud



- DUI
- Suspended for other reasons (child support, tickets, failure to appear)
- Identity Theft
- Theft of Public Assistance (DSHS, L&I)
- Theft of SSA benefits
- False claim of US citizenship
- 21 for entry into bars
- Criminal Record

FRS RCW



RCW 46.20.037 – Facial Recognition Matching system

- **Authorizes DOL's use**
- **Governs release to outside entities**
 - **The release requires a court order**

Helpful Information for Court Order/Search Warrant



- For our purposes, the court order should indicate what type of photo you're providing i.e. electronic, preexisting DOL photo, etc., that you want ran through FRS. Be sure to include the electronic image or WA DL/IP/ID card information (PIC number) for the subject.
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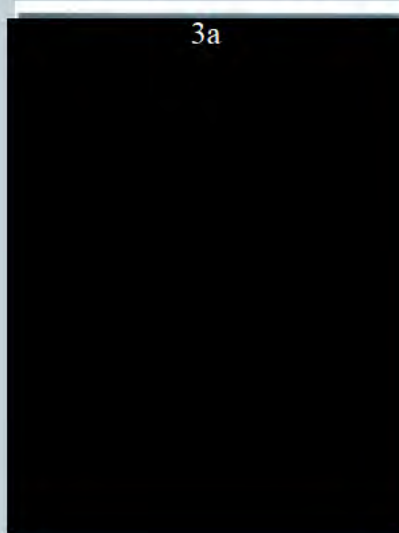
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- Photo must be a straight on image of subject's face
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- Seattle Police Department and Pierce County Sheriff's Office have their own FRS.

Photo examples

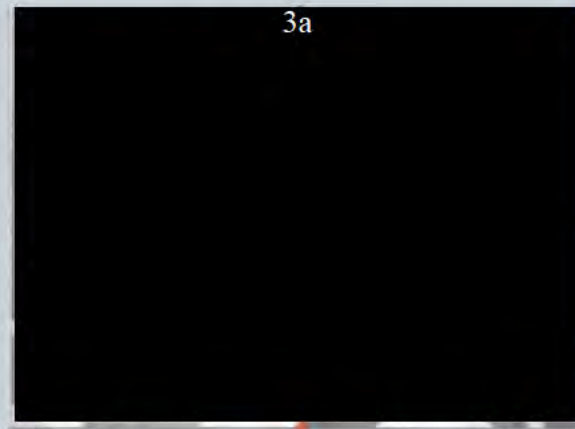


○

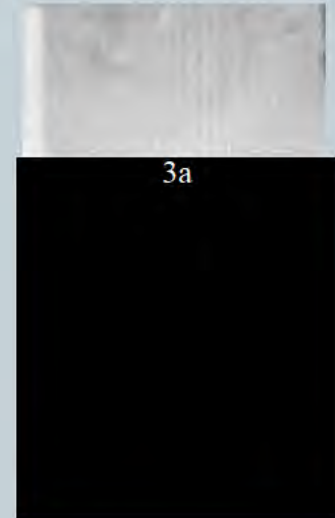
CA DL PHOTO



BOOKING PHOTO



WA BLACK AND WHITE



INVESTIGATE



The screenshot displays the INVESTIGATE software interface. At the top, there is a navigation bar with tabs: Leads, Cases, Search List, My Identifications, My Groups, My Watch List, My Links and Exclusions, and Find People. Below this is a toolbar with buttons for 'Create Dossier', 'Current User', and 'Upload Image'. The main workspace is divided into two panes. The left pane shows a sidebar with 'All uploaded' and 'Custom Groups' sections. The right pane displays a large black rectangle labeled '3a' and an 'Identification' dialog box. The dialog box contains the following fields: 'Max. Candidates' (set to 10), 'Gender' (set to Any), 'Age Range' (with 'to' and 'from' input fields), 'Height Range' (with 'to' and 'from' input fields), 'Method' (with a checked '1:N' option), and 'Biometric Type' (with a checked 'Face' option). At the bottom of the dialog are 'Identify' and 'Cancel' buttons. Three red dashed boxes with arrows point to specific elements: one points to the 'Max. Candidates' dropdown, another points to the '1:N' method selection, and a third points to the 'Identify' button.

Candidate number can be adjusted by investigator

1:N (Many) – Identification is the process of comparing the image template for one person (the Probe) to the image templates of every other person in the FRS database. If a closeness match is found a case is created.

Click here to start investigation

Results of Image Upload



Leads Cases Scrub List **My Identifications** My Groups My Watch List My Links and Exclusions Find People

List View 639681 ✕

Save Changes **Match** Possible Matches Clear - No Issues Move to: -----

1:N Portrait
Notes & Files
Case History
Linked Cases
Case Dossier

Case Details
Level: Lead
Case Origin: MI
In Use By: agreene
Portrait:
Max. Candidates: 10
1:N Threshold: 0

Image Upload Details Related Cases

Image Title: (50 Character Max)
CA Booking Photo
Image Description: (250 Character Max)

Update

Uploaded image

Possible Matches

3a

0.77	0.73	0.69	0.69
------	------	------	------

3a

0.69	0.68	0.66	0.64
------	------	------	------

LICENSE INTEGRITY UNIT



QUESTIONS????

CONTACT INFORMATION



- Mailing address:
PO BOX 9029
Olympia, WA 98507
(360) 902-3915
- Email: fraud@dol.wa.gov
- [http://www.dol.wa.gov/driverslicense/
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DOL DIVISIONS



**DIRECTOR'S OFFICE
ADMINISTRATIVE SERVICES
BUSINESS & PROFESSIONS
HUMAN RESOURCES
INFORMATION SERVICES
CUSTOMER RELATIONS
PROGRAMS AND SERVICES**

LIU



LICENSE INTEGRITY UNIT



WASHINGTON STATE DEPARTMENT OF
LICENSING

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- Administrator, Glenn Ball
- Assistant Administrator/Manager
- Two Supervisors
- Two Support Enforcement Technicians
- One Customer Service Specialist 2
- Five Driver/Vehicle Investigator 2's
 - 2 Enhanced Driver License
- 10 Investigator 1's

SERVICES



- Driver license, Identification card photographs and applications for issuance
- Montages
- Vehicle inquiries and transaction documents
- Facial Recognition Queries
- Driver and Vehicle Investigative assistance
- Undercover driver licenses and identification cards

LIU Investigates

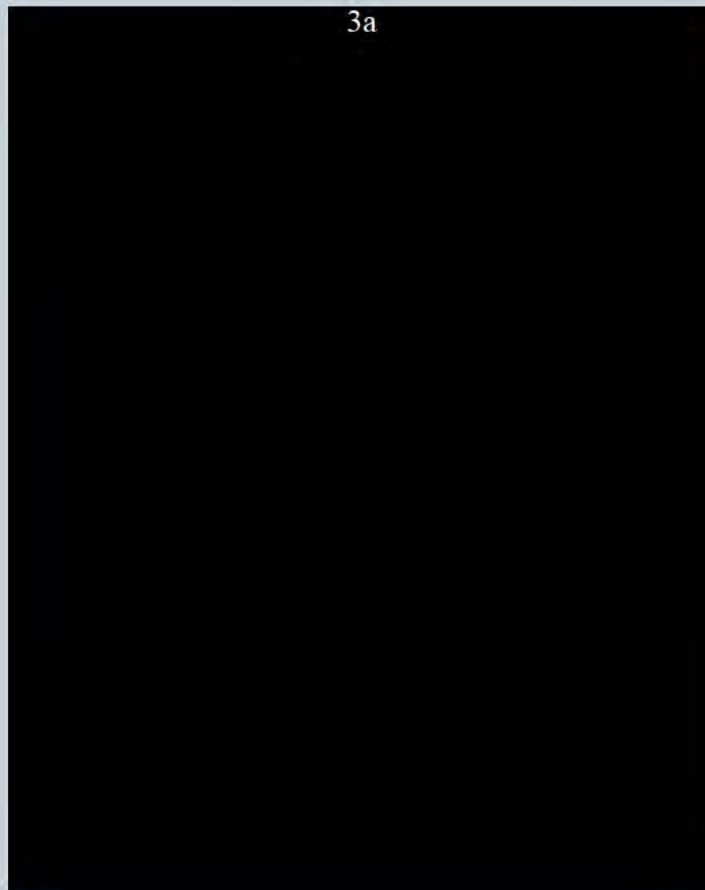


- **Vehicle license/title fraud**
 - Vehicle theft
 - Avoid transportation district taxes or emission testing
- **Subagent misconduct**
 - Accepting questionable or fraudulent documents
- **Address fraud**
 - Non residents seeking or obtaining a Washington driver license
- **Identity theft/Multiple identities**

Has someone stolen your face?



3a



Where do LIU's Fraud cases originate?



- FRS
- Internal referral (LSR, Out of State Unit, Record Response Unit, Vehicle Licensing Offices, etc)
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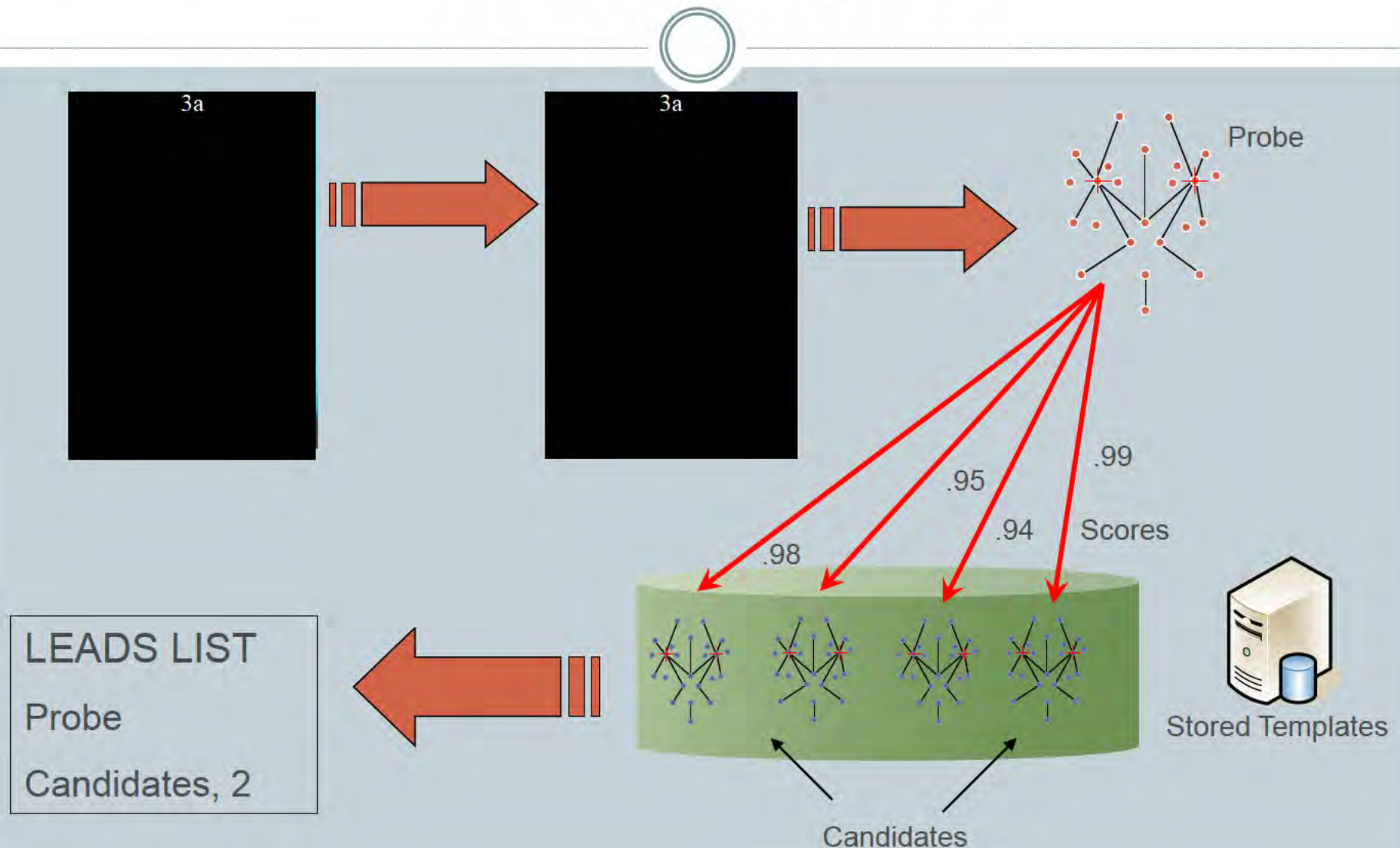
FRS RCW



RCW 46.20.037 – Facial Recognition Matching system

- **Authorizes DOL's use**
- **Governs release to outside entities**
 - **The release requires a court order**

How FRS works



Daily Issuance / One to One



2a, 3a

GROSECLOSE,TEST RECORD

2b, 3a

GROSECLOSE,TEST RECORD

Daily Review / One to many



Image Upload

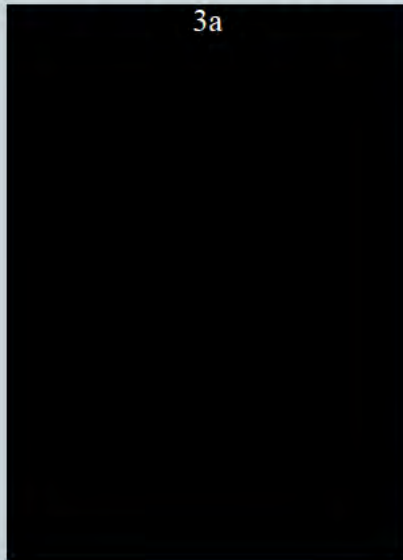


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Photo examples



CA DL PHOTO



3a

BOOKING PHOTO



3a

WA BLACK AND WHITE



3a

INVESTIGATE



The screenshot displays the INVESTIGATE software interface. At the top, a navigation bar includes tabs for Leads, Cases, Search List, My Identifications, My Groups, My Watch List, My Links and Exclusions, and Find People. Below this, a secondary bar contains buttons for Create Dossier, Search Images, and a Current User dropdown. The main workspace is divided into several panels. On the left, a panel titled 'All uploaded' shows a list of 'Custom Groups'. The central area features a large black rectangle labeled '3a'. To its right, a smaller black rectangle is also labeled '3a'. A modal window titled 'Identification' is open, displaying search parameters: 'Max. Candidates' set to 10, 'Gender' set to 'Any', 'Age Range' and 'Height Range' with empty input fields, 'Method' with a checked '1:N' option, and 'Biometric Type' with a checked 'Face' option. At the bottom of the modal are 'Identify' and 'Cancel' buttons. Three red dashed boxes with arrows point to specific elements: one points to the 'Max. Candidates' dropdown, another points to the '1:N' method selection, and a third points to the 'Identify' button.

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Click here to start investigation

Results of Image Upload



Leads Cases Scrub List **My Identifications** My Groups My Watch List My Links and Exclusions Find People

List View 639681 ✕

Save Changes **Match** Possible Matches Clear - No Issues Move to: -----

1:N Portrait
Notes & Files
Case History
Linked Cases
Case Dossier

Case Details
Level: Lead
Case Origin: MI
In Use By: agreene
Portrait:
Max. Candidates: 10
1:N Threshold: 0

Image Upload Details Related Cases

Image Title: (50 Character Max)
CA Booking Photo
Image Description: (250 Character Max)

Update

Uploaded image

Possible Matches

3a

0.77	0.73	0.69	0.69
------	------	------	------

3a

0.69	0.68	0.66	0.64
------	------	------	------

LICENSE INTEGRITY UNIT



QUESTIONS????

Helpful Information for Court Order/Search Warrant



- For our purposes, the court order should indicate what type of photo you're providing i.e. electronic, preexisting DOL photo, etc., that you want ran through FRS. Be sure to include the electronic image or WA DL/IP/ID card information (PIC number) for the subject.
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- Often times the court order needs location information, so for your reference – the FRS system is housed at 1125 Washington ST SE Olympia WA 98507 in the Highways and Licenses Building and is operated by License Integrity Unit staff, Attn: JoAnna Shanafelt or Ashley Palmer. If you want to fax the court order to us, you can at 360-570-1246 or you can email it to fraud@dol.wa.gov and it will be forwarded to us.

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RCW 46.20.037

Facial recognition matching system.

(1) The department may implement a facial recognition matching system for drivers' licenses, permits, and identicards. Any facial recognition matching system selected by the department must be used only to verify the identity of an applicant for or holder of a driver's license, permit, or identicard to determine whether the person has been issued a driver's license, permit, or identicard under a different name or names.

(2) Any facial recognition matching system selected by the department must be capable of highly accurate matching, and must be compliant with appropriate standards established by the American association of motor vehicle administrators that exist on June 7, 2012, or such subsequent date as may be provided by the department by rule, consistent with the purposes of this section.

(3) The department shall post notices in conspicuous locations at all department driver licensing offices, make written information available to all applicants at department driver licensing offices, and provide information on the department's web site regarding the facial recognition matching system. The notices, written information, and information on the web site must address how the facial recognition matching system works, all ways in which the department may use results from the facial recognition matching system, how an investigation based on results from the facial recognition matching system would be conducted, and a person's right to appeal any determinations made under this chapter.

(4) Results from the facial recognition matching system:

- (a) Are not available for public inspection and copying under chapter 42.56 RCW;
- (b) May only be disclosed when authorized by a court order;
- (c) May only be disclosed to a federal government agency if specifically required under federal law; and

(d) May only be disclosed by the department to a government agency, including a court or law enforcement agency, for use in carrying out its functions if the department has determined that person has committed one of the prohibited practices listed in RCW 46.20.0921 and this determination has been confirmed by a hearings examiner under this chapter or the person declined a hearing or did not attend a scheduled hearing.

(5) All personally identifying information derived from the facial recognition matching system must be stored with appropriate security safeguards. The office of the chief information officer shall develop the appropriate security standards for the department's use of the facial recognition matching system, subject to approval and oversight by the technology services board.

(6) The department shall develop procedures to handle instances in which the facial recognition matching system fails to verify the identity of an applicant for a renewal or

duplicate driver's license, permit, or identicard. These procedures must allow an applicant to prove identity without using the facial recognition matching system.

[2012 c 80 § 1; 2006 c 292 § 1; 2004 c 273 § 3.]

NOTES:

Finding—Purpose—Effective date—2004 c 273: See notes following RCW 9.35.020.

LIU



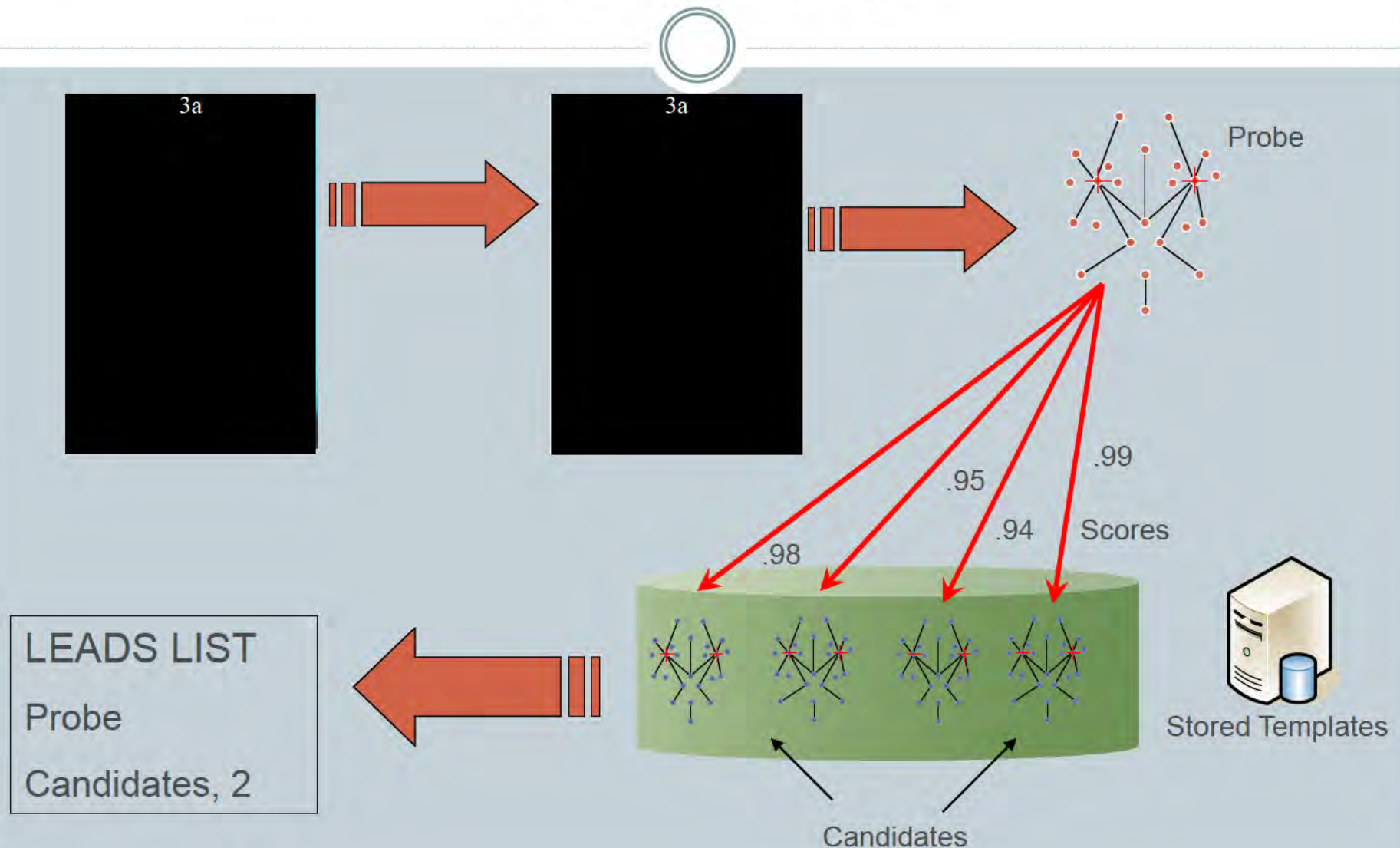
**LICENSE
INTEGRITY UNIT**

LIU Staff



- Administrator, Glenn Ball
- Two Supervisors
- Two Support Enforcement Technicians
- Five Driver/Vehicle Investigator 2's
 - 1 Lead
- 10 Investigator 1's

How it works



Facial Recognition System



- **December 2007:** FRS used on enhanced issuances only.
- **2007:** Scrub of system, resulted 4 million potential matches. Since the scrub, we have gradually worked our way through the reviews of the 4 million records.
- **October 2010-June 2011:** Pilot project on all issuances.
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- **December 2014:** Received an upgraded system.

Where do LIU's Fraud cases originate?



- FRS
- Internal referral (LSR, Out of State Unit, Record Response Unit, Vehicle Licensing Offices, etc)
- External agency referral (LE, courts, DMV)
- Victim allegation
- Anonymous tip

Criteria for Priority Assignment



- A victim
- Three or more identities
- Habitual Traffic Offender (HTO)
- A suspended/revoked record
- Law enforcement/outside referral
- A 21 year old
- ID card fraud – no driver licenses issued on any of the records involved

This is the result of a 2,700 case backlog.

Motives of identity fraud



- DUI
- Suspended for other reasons (child support, tickets, failure to appear)
- Identity Theft
- Theft of Public Assistance (DSHS, L&I)
- Theft of SSA benefits
- False claim of US citizenship
- 21 for entry into bars
- Criminal Record

FRS RCW



RCW 46.20.037 – Facial Recognition Matching system

- **Authorizes DOL's use**
- **Governs release to outside entities**
 - **The release requires a court order**

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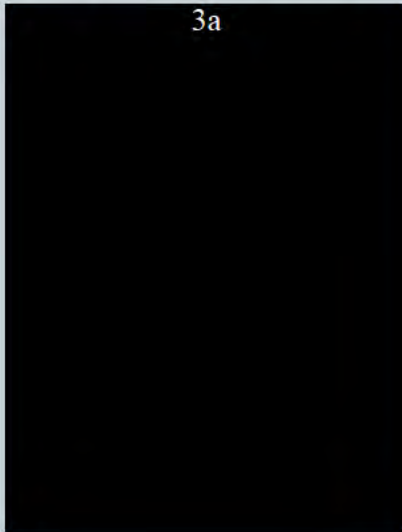
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Photo examples



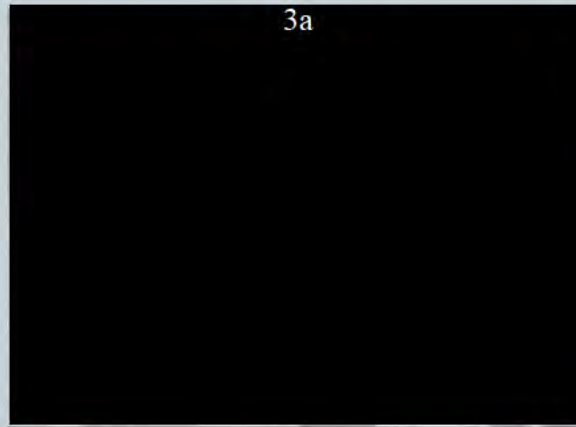
○

CA DL PHOTO



3a

BOOKING PHOTO



3a

WA BLACK AND WHITE



3a

INVESTIGATE



The screenshot displays the INVESTIGATE software interface. At the top, a navigation bar includes tabs for Leads, Cases, Search List, My Identifications, My Groups, My Watch List, My Links and Exclusions, and Find People. Below this, a toolbar contains buttons for Create Dossier, Search, and a dropdown for Current User. The main workspace is divided into several panels. On the left, a sidebar shows 'All uploaded' and 'Custom Groups'. The central area features a large image placeholder labeled '3a'. Overlaid on this is a 'Personalization' dialog box. This dialog has fields for 'Max. Candidates' (set to 10), 'Gender' (set to Any), 'Age Range' (with 'to' and 'from' sub-fields), and 'Height Range' (with 'to' and 'from' sub-fields). The 'Method' section has a red box around the '1:N' checkbox, which is checked. The 'Biometric Type' section has a red box around the 'Face' checkbox, which is also checked. At the bottom of the dialog are 'Identify' and 'Cancel' buttons. Three red dashed boxes with arrows point to specific elements: one points to the 'Max. Candidates' dropdown, another points to the '1:N' checkbox, and a third points to the 'Identify' button. A fourth red dashed box is located at the bottom right of the interface.

3a

Candidate number can be adjusted by investigator

1:N (Many) – Identification is the process of comparing the image template for one person (the Probe) to the image templates of every other person in the FRS database. If a closeness match is found a case is created.

Click here to start investigation

Results of Image Upload



Leads Cases Scrub List **My Identifications** My Groups My Watch List My Links and Exclusions Find People

List View 639681 ✕

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1:N Portrait
Notes & Files
Case History
Linked Cases
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DOL DIVISIONS



**DIRECTOR'S OFFICE
ADMINISTRATIVE SERVICES
BUSINESS & PROFESSIONS
HUMAN RESOURCES
INFORMATION SERVICES
CUSTOMER RELATIONS
PROGRAMS AND SERVICES**

LIU



LICENSE INTEGRITY UNIT



WASHINGTON STATE DEPARTMENT OF
LICENSING

LIU Team



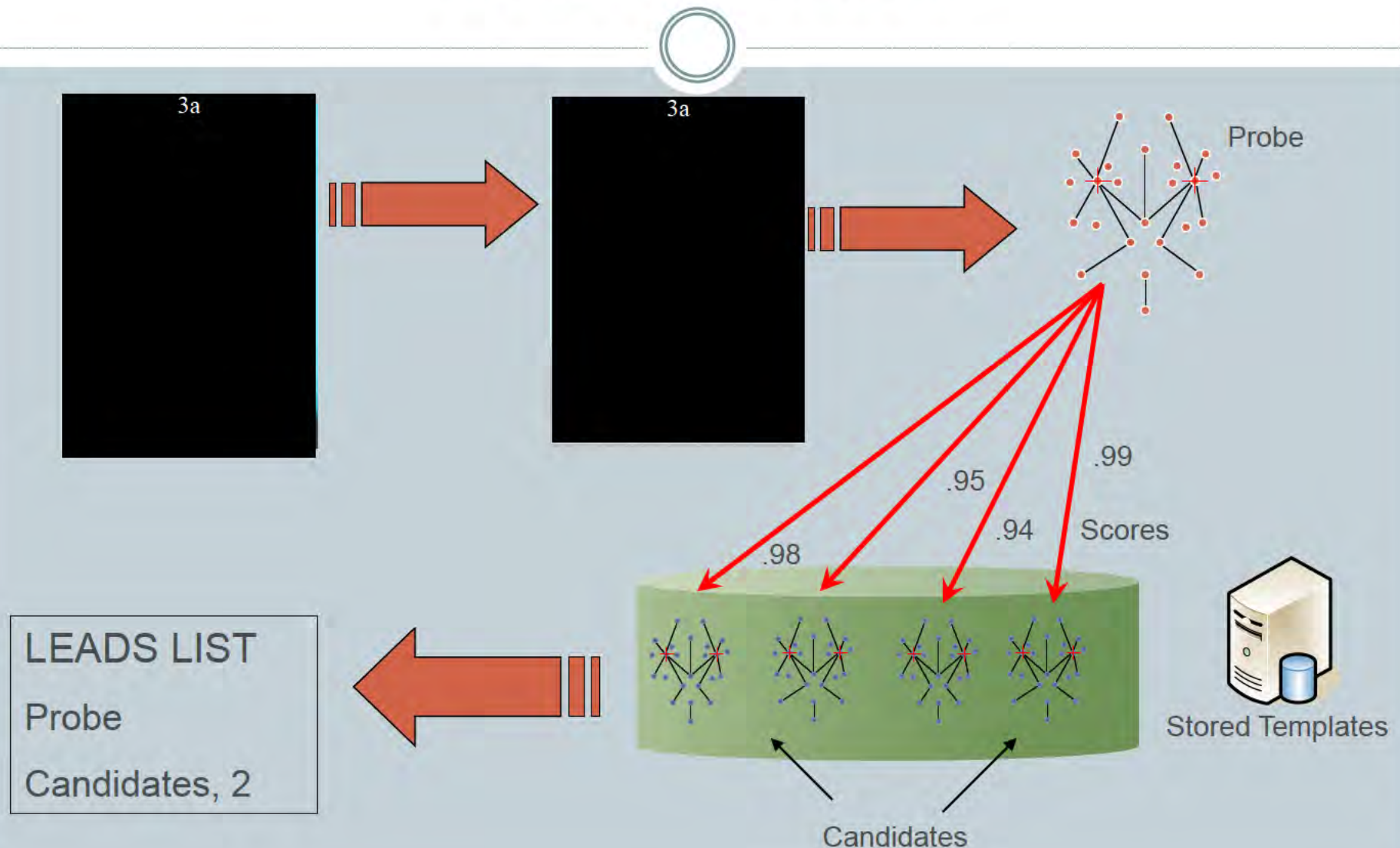
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- Assistant Administrator/Manager
- Two Supervisors
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SERVICES



- Driver license, Identification card photographs and applications for issuance
- Montages
- Vehicle inquiries and transaction documents
- Facial Recognition Queries
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- Undercover driver licenses and identification cards

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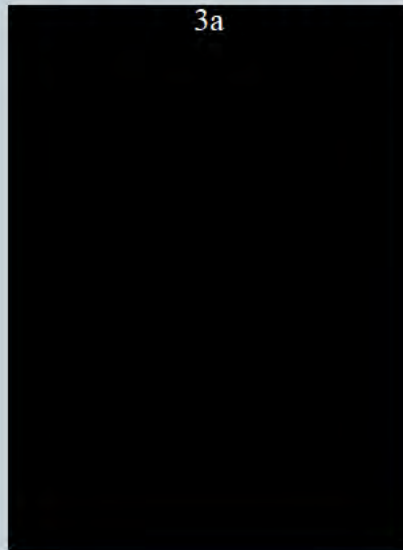


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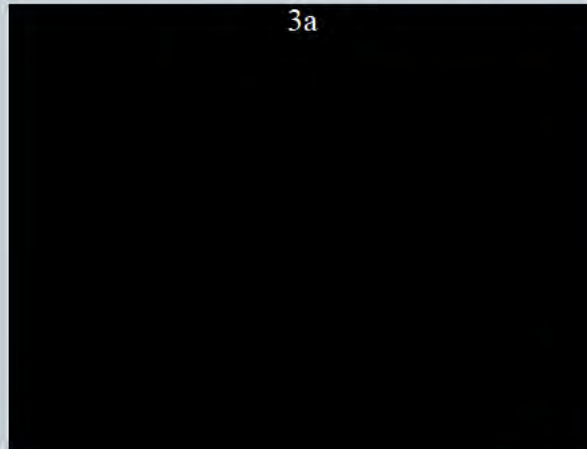
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