



December 7, 2009

The Honorable Stephanie Rawlings-Blake  
Members of the Baltimore City Council  
100 N. Holiday Street  
Suite 400  
Baltimore, Maryland 21202

RE: #09-0148R

Dear President Rawlings-Blake:

It is with great enthusiasm that I submit this letter of support for the feasibility and possible implementation of the *Youth Identification Card and Access Card to City Services (One Card)* from the perspective of the Baltimore City Department of Recreation and Parks (BCRP). BCRP has clear-cut and compelling interest in pursuing the feasibility of using a One Card system. This letter will provide BCRP's perceived benefits and potential obstacles for implementation of the One Card for use in the City's recreation centers, special facilities, and Park events. Over the past few years BCRP has been one of the staunchest supporters of the One Card system. We continue to be committed to the growth and development of the young people in our community and to building partnerships with government, business, education, and community agencies through strong educational and enrichment programs. We are excited about participating in this excellent program and providing our youth with opportunities that will prepare them for success in school and their life, and their leisure activities.

There are many proponents and detractors of identity card systems. Many question the value when compared to the risk associated with privacy and civil liberties. Identity systems like the One Card cannot be and should not be perceived as a panacea for a wide array of economic and social problems.

Moving to a system similar to that used in DC and other municipalities, can help Baltimore avoid some of the expense of operating multiple card systems among multiple agencies without creating a surveillance system in the process. Given this economic climate and the state of the City's finances, I am happy to support the examination of such a system. The implementation of an identity system requires significant deliberation and it seems that we are on the right path. If this system is to be successful in Baltimore City, decisions about the One Card have to be made after examining all of the related issues on both sides of the isle.

Madam President, your care in examining the One Card program can help avoid conflict with civil liberties and privacy, basic values of this country and community. The end result can be a program that meets your efficiency objectives because it enjoys widespread uptake.



## Understanding Identification—Economic and Social Bonding

Identification and credentialing is complex. It is important to understand in some detail the policy issues a card system like the One Card might encounter.

First, we should think of identification and identity cards as part of the economic and social bonding agent that would hold selected City services together when they want to deal with one another. For example, having a library card makes it easier to use a library, and it helps the library administer its processes. Similarly, having a library card that also gives you access to your local recreation center means that libraries and recreation center operations staff can program together more efficiently and effectively.

Additionally, identification allows people and organizations to keep records about each other, picking up where they left off when they encounter one another a second, third, fourth, or subsequent time. At BCRP, we have a great deal of repeat customers. Having a One Card system would allow for the capture of programming data for registration, customer satisfaction, and participation; safe and secure access and monitoring of facilities, and promotion and marketing of programs, services, and special events. This is an essential function and reason for further investigation of the One Card system.

One of the problems with an identity system is that it can get convoluted. Take a moment and think about how we constantly vary the information we share in our personal dealings. A simple example is the people who decline to give another person a phone number, or who shares his/her work number rather than his/her home number. This is an important protection, allowing us to maintain separation from people and entities we may not want to deal with. Many digital identification systems are unresponsive to these needs. They will identify a person more accurately than is needed and provide the relying party (the one "checking ID") with information that is not relevant to a transaction. We would have to guard against this in designing an identity system that works for Baltimore.

### Privacy and Data Security Risks

More specifically about these privacy risks, these have been characterized as "in system" and "out of system" risks.

"In system" refers to the card system itself. Does the card issuer collect just enough information to provide a reliable identification in the circumstances, or does it collect more information than is needed? A card system that has many uses, that has "high-value"/high-security uses, or that is part of a "federated" system will often require and contain more information than any one transaction requires.

"Out of system" privacy risks refer to the data that a system allows a relying party to collect. Many state drivers' licenses have a 2D bar code that quickly conveys in digital form not only the information printed on the card, but other information too. The 2D bar code standard selected by the Department of Homeland Security for compliance with the REAL ID law includes race data, for example, and the Department's rules did not bar states from including race information. This could be

collected and data-based during any transaction in which someone is required to share his or her driver's license.

Drivers' licenses and the budding national policy of "one driver-one license" bring all these dynamics together. Through inadvertence, the driver's license has become not just proof of entitlement to drive, but also proof of identity for financial transactions, proof of age, and even (mistakenly) a national security document at the airport, among many other things. Getting a driver's license now requires a deep dive into biographical information, collection of identity documents, and increasingly collection of biometrics.

Additional problems arise in these systems when "high-value" transactions are placed on them. If having a certain card will give someone access to benefits or payments, if having a fake card can facilitate fraud, and so on, attacks on that card system will predictably rise. Efforts to match the value of having a card will go into creating forged cards, using forged documents to get real cards, or corrupting card-issuing officials to get one. These attacks create not only problems for the direct victims of fraud, but for the people who fraudsters may impersonate.

When a card system moves to high-value uses like the transfer of funds, access to employment, and so on, myriad attacks on the system, countermeasures, and counterattacks will deeply complicate things. In the process, the privacy of the citizen can be ignored or overridden.

#### A Modest System With Minimal Privacy Risks

Fortunately for Baltimore, it seems the One Card program would not be such a sophisticated system. Although our One Card would be valued by the community, due to the provision of access to recreational programs and facilities, schools, libraries, MTA, or summer work programs, these are not considered "high-value" uses that would inspire fraud and forgery. This means the One Card program can be successful with only simple identification—a simple photo and some contact information. The following is a brief list of the major data that could potentially meet our needs:

- 1) contacts: name, address, telephone number;
- 2) gender;
- 3) date of birth;
- 4) last 4 digits of SSN;
- 5) agencies/programs that use the card; and
- 6) card number.

To be perfected, the privacy policy should probably include mention of the fact that the One Card program holds a photograph of the cardholder, and our process might examine whether gender, date of birth, and SSN information is needed to distinguish among users and administer the system. A system for less than 200,000 does not require nearly as much data. Each data element should be examined to see what purpose it serves, and discarded if it doesn't have uses that outweigh privacy considerations.

For our purposes and as compared to the DC One Card, we may only need a 1D bar code. This code contains only the serial number of the card. With this level of security, a City agency would scan the bar code and use this number to pull up records about the person, and to assure that the person is entitled to access facilities, check out books, and so on.

This number is an identifier, of course, and if it were used throughout the local economy it would become a tracking number in the same way that the driver's license can be, or that the Social Security Number is nationally in financial services and health care. But given the limited uses of the system today, this simple identifier is the data-minimizing way to administer access to various Baltimore public services.

Given the appropriate simplicity of the One Card program, the majority of the privacy issues I see are with the programs that use it. They hold the bulk of the data about their customers, and their policies should include providing users access to information about themselves and timely data destruction policies. The most secure data is the data that is never collected or that has been destroyed when it is no longer needed.

#### On The Horizon: Making Baltimore's One Card System Successful

As I stated earlier, identification and credentialing policies are complex. The complexities multiply rapidly when an identification system is put to new uses.

BCRP supports the use of the One Card system for Baltimore City government services that it is suited to, but not to assume that its success in some areas will guarantee success in all areas. Accesses to libraries, school, recreation programs and facilities, and summer programs are important but "low value" uses. And we would get efficiencies by combining them on a single card. A diversity of identification cards, card issuers, and credentials is not a failure of efficient government.

Thank you again for inviting me to provide this feedback on the use of the One Card identity system in Baltimore City. Please let me know if I can be of further assistance as you move forward with your investigation.

Regards,



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Interim Director

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