Executive Order No. E-736
December 1, 2014

THE CITY OF NEW YORK
HUMAN RESOURCES ADMINISTRATION

USE OF DUPLICATE IMAGE SEARCH TECHNOLOGY FOR THE NEW YORK CITY (IDNYC) IDENTITY CARD PROGRAM

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FROM: Steven Banks, Commissioner

I. INTRODUCTION

Pursuant to New York City Administrative Code Section 3-115 and the Mayor's Executive Order No. 6 of 2014, the New York City Human Resources Administration (HRA) is designated as the administering agency of the New York City Identity Card (IDNYC) Program. HRA and the IDCNY Program are committed to ensuring program integrity and preventing abuse of the IDNYC card. The Program will therefore use duplicate image search software (also known as facial recognition software) to protect against fraud and identity theft. The use of duplicate image search software is to the benefit of all applicants and New Yorkers in order to prevent identity theft. However, only the IDNYC database, and no others, will be searched with this software.

II. USE OF DUPLICATE IMAGE SEARCH SOFTWARE

When an individual applies for an IDNYC card, he or she will have their photo taken at an enrollment center. This photo image will be used for card printing and retained for the purpose of acquiring replacement cards and/or renewals. In addition, IDNYC investigators who have been specially trained and who have received appropriate authorization from the Executive Director of the Program or his/her designee will use duplicate image search software to verify that an applicant is not seeking multiple cards

or trying to obtain a card under a different name. This software tool works by comparing a template of each applicant's photo to other templates in only the IDNYC database to identify potential duplicates. These trained IDNYC investigators, and only these investigators, will evaluate the search results to account for false positives that may arise, such as with identical twins.

III. SAFEGUARDS

The IDNYC program incorporates the following safeguards in its storage of applicant photos and photo templates, and in its use of duplicate image search software:

- To ensure privacy for IDNYC applicants and the security of the IDNYC system, the database of photo templates derived from IDNYC applicant photos shall be separately stored from other applicant data.

- In addition, the photo template database shall be separately maintained and not integrated with any other biometric databases maintained by the City, state, or federal authorities.

- Law enforcement agencies shall not have direct access to the IDNYC duplicate image search database.

- Use of the duplicate image search software is limited to a small group of specially trained IDNYC staff. Only IDNYC investigators who have received appropriate training and who have been authorized by the Executive Director of the Program or his/her designee are permitted use of the duplicate image search software. This includes the review of potential false positive matches.

- Trained and authorized IDNYC program staff will compare applicants' images only to other images within the IDNYC duplicate image search database. The IDNYC program will not compare applicants' images to any image databases external to the IDNYC program.

- IDNYC applicant photos and the templates derived from such images will be protected by the same privacy and data security protections and protocols for other personally identifiable information of applicants collected by the IDNYC program. Specifically, this Executive Order supplements and does not supplant Commissioner's Executive Order No. 734 entitled "New York City Identity Card (IDNYC) Database Security."