The Facial Analysis, Comparison, and Evaluation (FACE) Services Unit runs face recognition searches for other FBI divisions and federal partners. FACE Services can search or request searches of 411 million photos, including 24.9 million mug shots, over 140 million visa photos and over 185 million state driver’s license and ID photos in: Alabama; Arkansas; Delaware; Illinois; Iowa; Kentucky; Michigan; Nebraska; New Mexico; North Carolina; North Dakota; South Carolina; Tennessee; Texas; Utah; and Vermont (GAO). As of 2014, there were 64 million licensed drivers in those states (FHWA). This means that almost one in three U.S. drivers’ photos can be searched by FACE Services.

The FBI does not require reasonable suspicion to run a search; searches can be run in cases where “allegation or information” indicates possible criminal activity (FBI). While the FBI has not evaluated the accuracy of the state face recognition systems it relies on, this is partially offset by the fact that search results are manually reviewed by a FACE Services specialist before the top one or two candidate photos are sent to the requesting FBI agent as a potential lead (GAO). In a March 2015 Privacy Impact Assessment, the FBI asserted that audit procedures were in place to prevent misuse (FBI). A summer 2016 GAO investigation found that in the previous four and a half years, the FBI had not, in fact, audited its use of these databases (GAO).

Sources and Notes: FBI FACE Services Privacy Impact Assessment, Federal Highway Administration, GAO (Last updated: September 2016). Scorecard methodology can be found in the appendix. Numerical citations, e.g. (123456) refer to official records available online at www.perpetuallineup.org.