

October 2, 2017

Secretary of State Ruth Johnson
Michigan Department of State
7064 Crowner Drive
Lansing MI 48918

Dear Secretary Johnson,

People experiencing homelessness need State of Michigan ID cards to prove their identity, which is essential to achieving economic security and accessing critical services. Without proof of identity, it is nearly impossible to move toward self-sufficiency by applying for rental housing, opening a bank account, or gaining employment. A lack of identification documents can also prevent this group from applying for safety net programs and utilizing the basic services designed to assist them.

Earlier this year, the Michigan Coalition Against Homelessness (MCAH), working in conjunction with the Michigan ID Taskforce, conducted a survey on the challenges that people experiencing homelessness face when obtaining an ID. In just one week, 92 housing providers across the state who directly serve the homeless responded.

Over 70 percent of MCAH survey respondents identified the difficulty of acquiring supporting documents as one of the greatest barriers to securing State IDs. We understand the pilot exceptions program that your agency is offering in Genesee, Calhoun, Oakland, Macomb, and Wayne counties is a huge success. Therefore, we are requesting that revisions are made to the SOS-428 guide. These changes would allow for service providers and those experiencing homelessness to utilize the typical ID process in most cases rather than using the exception program. This would reduce the burden on the ID Exception Unit and could allow more individuals experiencing homelessness to obtain an ID despite the challenges that they are experiencing.

We understand that compliance with REAL ID requirements is important, but are hopeful that Michigan's two tiered REAL ID system will allow these documents to be added to the Form 428 for the non-compliant ID. New Mexico is a REAL ID state that has document accommodations for people experiencing homelessness – we would be happy to share what we've learned about their system.

The items specifically being proposed are as follows:

- **Amendments to Form 428**
 - **HMIS Photo ID in Column 3 (Identify Verification)**

This proof document is currently being used as part of the Exception pilot program. In order for a person to have access to this card, they must have a record in HMIS (Homeless Management Information System) and therefore be working with a participating agency in the local Continuum of Care.

This document would allow the local Secretary of State office to be reassured that the individual applying for ID is working with a reputable agency and that there is a detailed record housed within the system. Using this card, along with a homeless verification letter (see item #2) would provide documentation that the person is homeless and is working with an agency to resolve the housing crisis, also indicating that this ID is a necessary item to move forward.

As the ID Exception Unit has access to HMIS it would also be verifiable should you require internal verification. The HMIS Photo ID is similar to the use of a school photo ID which is already an accepted document.

- **Homeless Verification Letter in Column 4 (Proof of Michigan Residence)**
This proof document is also being used as part of the current exception program. A person experiencing homelessness would be unable to provide items such as a utility bill or mortgage statement. Again, this document would be provided by a service provider within the local Continuum of Care. Providing this item, along with Item #1, would provide documentation that the person is working is using the stated address as a trusted place to receive mail, is working with a reputable service provider, was in the system, and working towards resolving the housing crisis which requires an ID be made available to move forward.
- **Vaccination Records in Column 3 (Identity Verification)**
Many of the individuals who are experiencing homelessness and working towards obtaining an ID are more readily able to access their vaccination records which provide a means to verify identity. Many of those we serve are older adults whose school may no longer exist, making accessing school records an unobtainable process. The vaccination record would provide an alternative means to provide proof of identity.

Over 40 percent of housing providers also identified cost as one of the greatest barriers to clients securing IDs. Housing providers struggle to pay these fees for their clients, because they are not an allowable cost for most grants. In addition, the providers are already committing significant resources to ID assistance: The MCAH survey found that on average, 2 hours and 30 minutes of staff time was required to help one client obtain a State ID, though the range ran from 30 minutes to 10+ hours. For this reason, we are requesting that people experiencing homelessness be added to the list of populations for which state IDs are free.

- **Free ID For Me**
 - Include people experiencing HUD Category I homelessness, as verified by a housing provider, to the definition of “other good cause” for which the \$10 state ID fee can be waived.
 - If instead you feel a statute change is necessary, support an amendment to Sec. 2 of 1972 PA 222 (MCL 28.292) to add people experiencing homelessness to the list of populations under subsection 14.
 - The fiscal impact of this change is indeterminate but small. There were 66,483 homeless people in the State of Michigan during 2016. However, the best estimation of what subset of this population who needs state IDs comes from the MCAH State ID Needs Survey, which found 6,624 people assisted annually. This would equate to an estimated fiscal impact of \$66,240.

We, the undersigned organizations, very much appreciate the close working relationship between the Secretary of State and the Michigan ID Task Force and hope that we can find a way to move this process forward to make it easier for individuals experiencing homelessness across the state to obtain an ID. We would like to request a meeting with you to discuss this issue in more detail.

Sincerely,
Organization names here

CC: Nick Lyon, Michigan Department of Health and Human Services
Kelly Rose, Michigan State Housing Development Authority, Chair of the Interagency Council on Homelessness