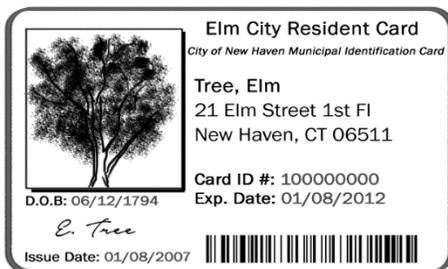


# Municipal Identification Feasibility Study

By

Alexander C. Heckman, Ph.D.

Chenelle A. Jones, Ph.D.



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and Mayor Andrew Ginther



Jones  
Heckman  
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<sup>1</sup> Elm City Resident Card Illustration on cover by Hanh (2014).

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# EXECUTIVE SUMMARY

A local identification (ID) card is simply a document issued and/or accepted by a municipal or county government. The City of New Haven, CT launched the first city ID program in 2007. Since then, county and municipal governments across the United States have launched about 18 local ID programs with 14 ID programs started within the last three years. Seven states (California, Connecticut, Illinois, Indiana, Michigan, Minnesota, New Jersey, and New York) have at least one community with a local ID program. New Jersey has seven communities with local ID programs and California and Connecticut each have three local ID programs, which is the second most.

While the authors examined available research, reports, and news accounts on all local ID programs, the focus of the study was on seven programs including: Chicago (IL), Detroit (MI), New Haven (CT), New York (NY), San Francisco (CA), South Bend (IN), and Washtenaw County (MI). Local communities usually start ID programs to help vulnerable populations, which disproportionately lack identification. Individuals from vulnerable groups are often unable to get IDs from the U.S. government or a state government because they do not meet eligibility requirements (legal status as a U.S. citizen, possessing a social security number, having unpaid parking tickets, lacking a permanent address, etc.) or they do not possess all the documentation required to obtain government-issued identification. The Brennan Center for Justice (2006) found that between 9% and 13% of U.S. citizens of voting age do not have valid ID, which in Columbus would represent between 81,000 and 118,000 residents.

The lack of valid government identification often places significant limitations on an individual's quality of life, the life of their families, and on their ability to be productive members of the community. Possessing a valid ID is often necessary to accomplish basic, daily tasks, such as accessing city services, opening a bank account, entering a child's school, and renting apartments. Although intended to benefit all residents of a city, studies have found that local IDs are especially valuable to some of the community's most vulnerable populations because they have the most difficulty obtaining an ID. The most common vulnerable populations that communities seek to assist with local ID programs include foreign-born residents, formerly incarcerated individuals, and residents who are homeless. The focus of many local ID programs is to provide identification that helps improve interactions with law enforcement officials and enables access to financial institutions. Local ID programs also typically offer benefits to cardholders, such as transit and library access, benefits at businesses within the city, discounts at local cultural institutions, etc.

## Key findings from the study include:

1. **Have a clear purpose:** The city should have a clear purpose for launching a city ID program. The purpose should drive the myriad of decisions about the program, particularly regarding where to focus limited financial and human resources dedicated to the program and how to measure its success.

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For example, if the purpose is to have most residents obtain the city ID card, then a local ID program is likely to fall far short of this goal. The typical total participation in a local ID program is between one percent and three percent of all residents, with the highest enrollments of residents being 15 percent in New York and 8 percent in New Haven.

In contrast, if a key goal is to help particular populations, a program can be relatively successful. For example, best estimates are that more than one-third of foreign-born residents in some communities have obtained a local ID. Also, there are communities in which nearly every individual released from jail enters the community with a local ID.

In addition, available research suggests that a local ID card does improve interactions with law enforcement and helps improve the quality of life of vulnerable populations.

2. **Maximize benefits:** If the City of Columbus chooses to launch a city ID program and applies the lessons and best practices shared in this report, the ID program should be able to provide benefits similar to other communities researched for this report, including:
  - a. Increasing the number individuals who have an ID in interactions with law enforcement
  - b. Providing benefits and discounts at businesses and cultural institutions
  - c. Improving access to library and transit services
  - d. Providing ID for voting.

The biggest challenge the city would likely face in terms of city ID card benefits would be in the area of using the card as primary identification for banking purposes. At the current time, area banks and credit unions are not inclined to accept a local ID as the primary identification for opening an account or other providing banking services.

3. **Adopt best practices for security and privacy:** If the City of Columbus chooses to launch an ID program, it should adopt best practices for authenticating applicants' identities and residency, protecting the integrity of the card with strong security features in the card design, and protecting the privacy of applicants and cardholders. Three key steps to accomplishing this include:
  - a. Involving law enforcement in the development and implementation of the program
  - b. Investing in quality training for program staff
  - c. Maintaining identity documents **ONLY** as needed to make a determination on whether the application will be approved or not
4. **Engage the community:** Launching and sustaining a successful local ID program requires engaging with residents, community organizations, and local businesses from the planning phase and after launch. The city will need to invest resources into developing and implementing a strategic engagement and marketing/branding plan.

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5. **Invest in implementation:** If the City of Columbus chooses to launch a city ID program, it should ensure that it allocates sufficient resources to make the program successful at launch and that it is sustainable in the future. Based upon the experience of other programs, launching and maintaining a vibrant program requires:
- a. A one-year planning phase, at least, before the launch
  - b. First year launch expenditures ranging from \$500,000 to \$600,000
  - c. Annual operating expenditures ranging from \$300,000 to \$400,000

Operating a successful program for a city the size of Columbus would likely require two to five full-time employees, including individuals who will implement marketing, partnership, and cardholder engagement efforts. Additional part-time or contract staff might be necessary depending on the decisions about what department will process applications. For example, if individuals who currently process recreation center ID applications also handled the city ID applications then the city may not need to employ additional employees for this purpose, after the initial six months.

The initial surge of interest at the launch of the program will require extra resources through some combination of allocating staff from different areas, hiring contract or temporary employees, and engaging volunteers and community organizations.

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# BACKGROUND

A local ID is an identification card issued by a local city or county government (or sometimes a local nonprofit organization) that the local government requires its departments and representatives to accept as a valid form of identification. At the least, a local ID includes the name and a photo of the cardholder along with a unique ID card number. Other identifying or personal information that may be visible on the card and/or stored on a magnetic strip on the card include the cardholder's address, birthdate, gender, emergency contact information, veteran status, and preferred name or gender identification. Local ID programs also typically offer benefits to cardholders, such as transit and library access, benefits at businesses within the city, discounts at local cultural institutions, etc. (Center for Popular Democracy, 2015).

## *Potential Need for a Local ID*

There is credible evidence indicating that a large number of individuals in the U.S. do not possess an identification card issued domestically by the U.S. government or a state or local government entity (for example see Weiser, Gaskins, & Iyer, 2011).<sup>2</sup> The most widely cited study on this topic is a nationally representative survey commissioned by the Brennan Center for Justice (2006) that found that between 9% and 13% of U.S. citizens of voting age do not have valid ID - in Columbus this would represent between 81,000 and 118,000 residents. More specifically, the Brennan Center (2006) found that the following populations disproportionately lack an unexpired government-issued ID with their current name:<sup>3</sup>

- **Between 11% and 19% of voting age citizens making less than \$35,000 per year:** If Columbus has similar percentages as the rest of the nation, this would equate to at least 40,300 residents.
- **Between 12% and 24% of citizens over the age of 65:** Assuming Columbus has a comparable percent without ID, this would equate to at least 10,000 residents.
- **Between 17% and 33% of African Americans:** This would equate to at least 41,480 residents if Columbus has a similar percent of African-Americans without ID.
- **Women** are more likely than men to lack an ID with their current name.

The lack of valid government identification often places significant limitations on an individual's quality of life, the life of their families, and on their ability to be productive members of the community.

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<sup>2</sup> However, foreign-born residents often possess identification documents issued by other countries.

<sup>3</sup> U.S. Census Bureau data is the source of demographic data for Columbus.

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Possessing a valid ID is often necessary to accomplish basic, daily tasks, such as accessing city services, opening a bank account, entering a child’s school, and renting apartments.

In an attempt to address the barriers faced by many U.S. and foreign-born residents that lack U.S. or state identification, about 20 local governments have established ID programs. While the experiences other communities are discussed in the study when relevant, this report focuses on seven local programs that were selected because of the insights they would provide for the City of Columbus – presented in order of their launch dates, which are shown in parentheses:

1. **City of New Haven, Connecticut (2007):** As the longest-running program, New Haven has the most experience regarding the challenges of, and opportunities for, sustaining a local ID program.
2. **City of San Francisco, California (2009):** San Francisco also has a long-running program and is more comparable to Columbus in terms of population, which should offer helpful insights into implementation challenges, logistics, and cost.
3. **New York City, New York (2015):** New York has the largest, best-researched, and arguably the most successful local ID program in the country.
4. **Washtenaw County, Michigan (2015):** Washtenaw County provides insights on administering a county-level ID program, and strategies for collaborating with a nonprofit organization on implementing a local ID program.
5. **City of Detroit, Michigan (2016):** Detroit is a similar-sized Midwestern city that provides insights into effectively contracting with a for-profit organization to implement a local ID program.
6. **City of South Bend, Indiana (2017):** South Bend provides insights into a local ID program in the Midwest that is administered entirely by a nonprofit organization.
7. **City of Chicago, Illinois (2018):** Chicago is a large Midwestern city with one of the newest local ID programs, and can provide insights into the contemporary challenges of developing and launching the program.

Where it seemed valuable, the study also highlights aspects of other local ID programs including programs that are, or were, being considered.<sup>4</sup> For example, the City of Pittsburgh researched launching a city ID program and is currently seeking financial support from community foundations and businesses for its program. Pittsburgh plans to implement a program if it can garner sufficient financial contributions to support most of the cost of launching a program and administering it.

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<sup>4</sup> We could not find evidence of any local ID programs that were launched and discontinued.

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In addition, the City of Phoenix was prepared to launch a city ID program in 2016, but decided not to due to financial and political issues. Specifically, the Phoenix City Council voted 5-4 to contract with SF Global, LLC to implement a city ID program that would be “cost neutral” to the city. The city and SF Global waited two years before implementing the program because it seemed like the state legislature was going to pass a bill banning local IDs. Ultimately, no bill passed, but then SF Global informed the city that it would not be able to fund the ID program solely through program revenues, and the city would have to provide, or obtain, significant financial support for the program. Therefore, in 2018, the City of Phoenix determined it was not feasible to launch a city ID program. However, a city report about the program indicated, “In the future, staff will continue to research creative ways of combining the various city cards into one, easy-to-use city services card” (Boehm, 2018).

### Potential Benefits of a Local ID Program

Individuals without identification issued by the U.S. or a state or local government entity often face significant barriers to participating productively in the economic and social life of the community. Although intended to benefit all residents of a city, studies have found that local IDs are especially valuable to some of the community’s most vulnerable populations. That is because these individuals have the most difficulty obtaining the acceptable identification needed to open a bank account or cash a check, see a doctor at a hospital, register their child for school, apply for public benefits, file a complaint with the police department, borrow a book from a library, vote in an election, collect a package from the post office, etc. Vulnerable populations include:

- **Foreign-Born Residents:** Foreign-born residents can have some of the worst difficulties participating in their community because they lack a U.S. or state government issued ID. Foreign-born residents who do not have an ID are often afraid to report crime and request assistance from law enforcement. This often occurs from fear of being arrested or jailed for not having a valid ID. For example, a report conducted by Iowa City, Iowa found anecdotal evidence suggesting that immigrants who have passports and foreign-government-issued ID cards are often reluctant to show them to law enforcement and other city officials because they fear discrimination (Fleck & Moody, 2014). Having a local ID could ameliorate those fears. Other studies have found that local ID cards can improve police/community relations with foreign-born residents, and with others who lack IDs issued by the U.S. or state governments (Center for Popular Democracy, 2015).
- **Formerly Incarcerated Individuals:** Individuals seeking to reintegrate into society face major hurdles to obtaining key services, such as housing, and employment, if they do not have a government-issued photo ID.

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- **Members of the LGBTQIA Community:** Studies have found that those who are transgender and/or gender non-conforming are especially challenged when attempting to access financial and other services without a government-issued ID that accurately reflects the gender with which they identify. This could potentially result in discriminatory treatment, harassment, employment barriers, and reduced quality of life opportunities. Also, LGBTQIA immigrants experience the same challenges as other foreign-born residents with an additional layer of discrimination due to their sexual orientation (Center for Popular Democracy, 2015).
  - **Homeless Individuals:** Many people who are homeless lack photo identification. Some studies have found that the primary form of ID that a homeless person has is an Electronic Benefit Transfer card (EBT card), which does not include a residential address. As a result, they are often not accepted for official purposes (Center for Popular Democracy, 2015). Many people who are homeless do not have the necessary documents to prove residency. This then prevents them from obtaining an ID card at all, or they must get a card with either: 1) no address, or 2) a "care-of" address. To address this issue, some local ID programs allow formerly incarcerated and homeless residents the ability to list the local jail or homeless shelter address as their place of residence.
  - **Senior Citizens:** When transportation is easily accessible, seniors may not want to go through the process of gathering the documentation necessary to obtain a state-issued identification card. Sometimes, seniors rely on Medicare or their social security card as a form of identification. However, these cards do not include the photo or address of the cardholder, which places significant limitations on their usefulness (Center for Popular Democracy, 2015).
  - **Young People:** Youth, particularly those with unstable home environments, often have a difficult time obtaining state identification cards due to the costs or lack of necessary documents. When youth interact with law enforcement and/or other governmental authorities, having an ID can help them facilitate a positive encounter and avoid being detained. An ID card can also help youth conduct successful job searches, receive supportive services, and access after-school programs. Jurisdictions can also include an emergency contact feature, such as in Washtenaw County, where cardholders are able to include the name and contact information for someone in case of an emergency. In the case of youth, this information could include the information for a parent or guardian.

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## Section 1 – Key Action: Deciding on Program Purpose

As with any important public policy or strategic initiative, it is critical to have a clear purpose for launching a city ID program. The purpose should drive the myriad decisions about the program, particularly regarding where to focus limited financial and human resources dedicated to the program and how to measure the success of the program. As previously discussed in the section titled *Background*, the lack of government identification negatively impacts individuals' ability to participate in the economic and civic life of a community, including affecting interactions with law enforcement, access to financial institutions, and the ability to obtain services from businesses and government.

Without exception, all local ID programs researched were started with the purpose of helping individuals within vulnerable populations who often do not have identification issued by a state or the U.S. government. Specifically, vulnerable populations that communities seek to help with their local ID programs include foreign-born residents, individuals who are homeless, those reentering the community from jail or prison, and the elderly, particularly in minority communities.

Many jurisdictions focus on helping foreign-born residents because they represent a relatively large percentage of their population (see Table 1.1) and foreign-born residents disproportionately lack an official ID from a state and U.S. government entity because applicants often need to provide a social security number and/or demonstrate U.S. citizenship or legal status.<sup>5</sup> The requirement to show legal status will only increase as U.S. government REAL ID requirements have to be in effect in all states by 2020. For example, to obtain a State of Ohio ID card, an applicant must provide documentation of their legal presence in the United States and their social security number, if one has been assigned (<https://www.bmv.ohio.gov/dl-id-card.aspx>).

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<sup>5</sup>The Director of South Bend Indiana's community ID program points out that individuals who are referred to as "undocumented" typically have many documents - consular cards, foreign drivers' license, etc. - but "not the ones they need" for daily life in the U.S. (S. Centellas, personal communication, August 29, 2018).

Table 1.1

*Demographics of U.S., Columbus, and Select Communities with Local IDs*

Community	% Foreign-Born Residents	% Latino or Hispanic Residents
Chicago	21%	30%
Columbus	12%	9%
Detroit	6%	7%
New Haven	17%	32%
San Francisco	35%	15%
South Bend	9%	15%
New York	38%	29%
U.S. Average	14%	17%
Washtenaw	12%	5%

**Source:** U.S. Census Bureau and [www.worldpopulationreview.com](http://www.worldpopulationreview.com)

**Note:** Latino/Hispanic data is presented because in many communities the largest population of foreign-born are individuals from Latino countries

As Table 1.1 shows, four of the seven local communities with ID programs have an above-average percent of foreign-born and/or Latino/Hispanic residents in comparison the national average. While Detroit does not have a high percentage of foreign-born and/or Latino/Hispanic populations, it does have the third-largest homeless population in the U.S., and more than 80 percent of the population is African American (P. Takash, personal communication, November 20, 2019; U.S. Census Bureau). South Bend and Washtenaw have below-average percentages of foreign-born residents and Latinos/Hispanics; however, their percentages are above average within their state. South Bend and Washtenaw are also indicative of communities that launch local ID programs with a strong community organization, or a coalition of organizations, that spearhead the local ID effort in order to help certain vulnerable populations (L. Sanchez, personal communication, November 20, 2018; S. Centellas, personal communication, August 29, 2018).

While Columbus has a below-average percentage of foreign-born and Latino/Hispanic residents, there are a significant number of foreign-born residents who could benefit from a local ID program. For example, 12 percent of Columbus’ population represents more than 105,000 foreign-born residents, including between 25,000 and 45,000 unauthorized immigrants within the Columbus Metropolitan Area (Pew Researcher Center, 2017). One large foreign-born population that could potentially benefit from a city ID would be the 13,000 to 40,000 Somali immigrants who live in Columbus (Associated Press, 2016). The U.S. Department of Housing and Urban Development recently reported approximately 1,800

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homeless residents living in Franklin County. Another important population in Columbus that might be interested in a local ID would be the LGBTQIA community, which represents about four percent of Columbus residents or more than 35,000 residents (Roth, 2018).

While an important purpose of most local ID programs is to help vulnerable populations, nearly all communities have sought to ensure their cards would provide benefits to all residents in order to avoid stigmatizing cardholders and to provide a sense of connection to the community for everyone (Center for Popular Democracy, 2015, p. 4). Therefore, almost all local communities seek to attach benefits to the card that would be of interest to any resident - making it a card for everyone. As Table 1.2 shows, nearly all local ID card programs offer benefits or features beyond simply serving as identification.

Table 1.2  
Local ID Benefits for Selected Communities

Community	Linked to Transit System	Linked to Library Account	Cultural Institutions Free Memberships or Discounts	Entertainment & Sports Discounts	Food & Restaurant Discounts	Beauty & Apparel Discounts	Primary ID for Financial Institutions
<u>Chicago</u>	✓	✓	✓	✓	✓	✓	Self-Help Federal Credit Union & GN Bank
Columbus	Likely	Yes	Likely	Likely	Likely	Likely	Possibly
<u>Detroit</u>			✓	✓	✓	✓	One Detroit Credit Union
<u>New Haven</u>		✓		✓	✓		
<u>New York</u>	✓	✓	✓	✓	✓	✓	<u>14 Banks &amp; Credit Unions</u>
<u>Newark</u>		✓	✓	✓	✓	✓	City National Bank, Investors Bank, & North Jersey Federal Credit Union
<u>Oakland</u>	✓*						
<u>Richmond</u>	✓*						
<u>San Francisco</u>		✓	✓	✓	✓	✓	<u>6 Credit Unions</u>
<u>South Bend</u>		✓					
<u>Washtenaw</u>	✓*		✓	✓	✓	✓	Old National State Bank & Ann Arbor State Bank

**Notes:** \*Can be used for Amtrak and Greyhound rather than local transit system.

As shown in Table 1.2, every local ID program offers other benefits beyond simply identification for local government departments. The most common additional benefit is to serve as identification for financial institutions. This occurs because most local ID programs are intended to help vulnerable populations that have trouble accessing financial institutions, and are “unbanked” or “underbanked” (Federal Deposit Insurance Corporation, 2017). Among the “Other” benefits associated with local ID cards,

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include the ability to access public beaches and dumps, free dance lessons, discounts for veterans towards pet adoption, and discounts on prescriptions.

New Haven and Oakland started out with a debit feature; however, these features eventually were eliminated due to technological changes (New Haven) or because the feature proved to be too expensive to continue to offer (Oakland).

Based upon research and interviews with local officials, it appears that a Columbus ID could provide many of the benefits offered in other communities:

- **ID for Interactions with Police:** *Yes* - This could definitely be a benefit of a Columbus ID card, as the city could direct the police department to accept the city ID. The police in every community researched have been involved in the development of the local ID program and, as a result, have come to support it, and find it to be a valuable benefit for officers - *see Sections 2 and 3 of this report for more details.*
- **Access to Financial Institutions:** *Possibly* – While financial institutions would accept a city ID as a secondary form of identification, getting a city ID accepted as a primary form of identification will be a major obstacle. Except for PNC in New York City, no other community has convinced a national bank to accept a local ID as a primary form of identification for opening accounts, even though all have tried. In contrast, six out of ten communities have been able to get at least one local bank or credit union to accept their local ID as a primary form of identification.

However, even this can be a challenge in many communities. For example, “New Haven engaged local banks, in partnership with the Connecticut Bankers Association, in a dialogue to address concerns about the security of the proposed ID card and authentication of documents. The Bankers Association hosted a forum where the city presented its ID card program and took questions from banks” (Matos, 2008). Despite this effort, no financial institutions in New Haven accept the Elm City ID as a primary form of identification for banking services.

The Ohio Bankers League indicated that national and regional banks would be reluctant to accept a city ID as primary form of identification given concerns about complying with U.S. government banking regulations and the relatively low numbers of potential customers that might arise from accepting a city ID card (D. Boyd, personal communication, February 8, 2019). In contrast, six out of ten communities have been able to get at least one local bank or credit union to accept their local ID as a primary form of identification.

The greatest potential for getting a city ID accepted as a primary form of identification would be through local credit unions, though this would also be a significant challenge in Central Ohio. For example, Kemba Credit Union indicated that it would accept a city ID as a secondary form of

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identification for completing transactions, but not as a primary form for opening accounts. Kemba stated that the State of Ohio would have to recognize a city ID in order for them to accept it as a primary form of identification for opening accounts (T. Bachman, personal communication, January 22, 2019).

A further complicating factor in getting a credit union to accept the card is that many area credit unions participate in the “shared branching” network, which allows credit union members to bank without charge at any credit union in the network. The program has strict fraud guidelines that any card would have to meet. Therefore, the City of Columbus would have to invest significant time and effort to get a local financial institution to accept a city ID as a primary form of identification and may not be successful in doing so.

- **Benefits from Businesses and Cultural Institutions:** *Yes* – Assuming the City of Columbus invested sufficient resources, it seems almost certain that it could secure a significant number of businesses and cultural institutions to offer benefits to city ID cardholders, given that nearly every community researched, has been able to provide this type of benefit.
- **Access Public Transit:** *Likely* – Representatives from Central Ohio Transit Authority (COTA) indicated that it is feasible to link a city ID with a transit account. However, the third party vendor costs associated with integrating the systems could present a barrier and COTA would have to work with the City of Columbus to work out the logistics of the program (M. Carroll, personal communication, February 19, 2019).
- **Use as Library Card:** *Likely* – Representatives of the Columbus Metropolitan Library (CML) indicated that it is likely feasible to link a city ID card to a cardholder’s library account. CML is willing to work with the city to determine the feasibility of linking the ID card and of using the Main Library as a location where the public could procure a city ID card (A. Circle, personal communication, December 11, 2018).
- **Use with Columbus City Schools:** *Yes, though potentially limited* – Officials from Columbus City Schools (CCS) indicated that a city ID card could serve as a benefit to its students and families due to the general benefits a card might offer. Also, a city ID card would meet the requirement to provide a photo ID when enrolling a child in the school system or picking them up from a school.

CCS is currently considering developing an ID for all of its students with the goal that it will eventually be used for tracking attendance in schools and on buses, accessing facilities, and access to resources at Columbus Metropolitan Library. However, this idea is in the early planning stages. It does not seem feasible for a city ID card to meet the needs and requirements of CCS given the myriad of legal requirements and operational challenges that would have to be addressed (M. Sain & C. Ward, personal communication, February 8, 2019).

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- **Apply for Social Service Benefits:** Yes – Franklin County Job and Family Services (FCJFS) will accept ID cards issued by the City of Columbus for social service benefits.
  - **Vote:** Yes – According to the Ohio Secretary of State (n.d.), “The forms of identification that may be used by a voter who appears at a polling place to vote on Election Day include ... an original or copy of a current other government ... that shows the voter’s name and present address.” The city would need to work with the Delaware, Fairfield, Franklin, and Pickaway County Boards of Elections to help ensure that poll workers are familiar with a city ID to recognize it as a government-issued ID.
  - **Use at the Post Office:** Yes - For services that require identification (excluding passport services), such as getting a PO Box, the U.S. Post Office (n.d.) requires “military, government, university, or recognized corporate ID.” This should include a city ID.
  - **Open Utility Account (Water, Electric, etc.):** Yes – In most communities, the local ID is accepted for opening these types of accounts.

#### Use of Cards and the Impact of Card Programs

This subsection examines the evidence for the overall demand for local ID cards, the demand among specific populations, the use of card benefits, and the impact of the card programs as it relates to one of the most important goals of all ID programs - improving interactions with law enforcement. Table 1.3 shows enrollment statistics for the selected ID programs.

Table 1.3  
Local ID Card Enrollment

Community	First Year Enrollment	First Year Enrollment % of Resident Population	Current Enrollment	% of Current Population	Average Enrollment Per Year
Chicago	NA	NA	16,000*	0.6%	NA
Detroit	2,400	0.4%	5,000	0.8%	2,500
New Haven	4,729	3.6%	10,000**	7.6%	2,000
New York	732,630	8.5%	1,322,945	15.4%	496,104
San Francisco	6,271	0.8%	27,758	3.1%	3,833
South Bend	1,000	1.0%	1,300	1.3%	867
Washtenaw	1,000	0.3%	2,100	0.6%	614

**Notes:** \*Chicago’s enrollment is after for the first four months of the program.

\*\*New Haven’s enrollment figure is based upon enrollment after the first five years

As Table 1.3 shows, in the first year of a local ID program, between 0.3 and 8.5 percent of residents obtained a card with an average of 2.3 percent. However, if New York City is excluded the average drops to 1.4 percent. The current enrollment average is 4.4% of resident population or 2.5% if New York is excluded.

Though overall enrollment is one way to assess the success of a local ID program, another way is to examine the extent to which particular populations obtained the ID because the program was created primarily to benefit particular populations rather than all residents. Because communities want to protect the privacy of cardholders, there is not extensive data on enrollment by demographic categories. However, several communities do have rough estimates about enrollment by foreign-born residents – please note that these estimates are based upon personal observations and proxies for immigrant status, such as surnames and language preferences:<sup>6</sup>

- **Detroit:** Officials estimate that about half of Detroit ID cards have been issued to Latinos, which represents more than six percent of the Latino population in Detroit (J. Suriano, personal communication, November 19, 2018).

<sup>6</sup> For example, the largest population of foreign-born residents in these communities is individuals from Latin American countries where Spanish is often a primary language spoken and, so, foreign-born status is inferred based upon these characteristics.

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- **New York City:** In New York, 29% of cardholders identified a preference for a language other than English. The most common language preference was Spanish (20% of cardholders) and 5% preferred Chinese (Mandarin or Cantonese), which was the second most common non-English language preference (Daley, Lunn, Hamilton, Bergman, & Tapper, 2016, p. 13).

In addition, 64 people have applied for the IDNYC under New York State Confidentiality program for survivors of domestic violence (Banks, Mostofi, and Thamkittikasem, 2018).

- **South Bend:** Nearly all of the cardholders who have signed up for the SBID are foreign-born residents, which represents about one-third of the immigrants within South Bend. Only two cards have been issued to homeless individuals (S. Centellas, personal communication, August 29, 2018).
- **Trenton (NJ):** Trenton issued about 1,500 local ID cards in its first year. About 90 percent of Trenton ID cardholders are foreign-born residents who come from more than thirty countries. Most cardholders are between 26 and 35 years of age (Fleck & Moody, 2014; Rogers & Stadnyk, 2010).
- **Washtenaw:** “Among a sample of 251 applicants who applied for Washtenaw IDs in the first six weeks of the policy’s implementation, 84% identified as Latina/o, whereas 8% identified as non-Latina/o white and 3% identified as non-Latina/o black” (LeBron, Cowan, Lopez, Novak, Ibarra-Frayre, & Delva, 2018).

The data from these communities suggest that local ID programs are often successful at helping a significant portion of the foreign-born residents obtain identification.

### Use of Card Benefits

Another way to assess the success or impact of a local ID card program is to examine why individuals decided to get a local ID card, and what benefits or features cardholders used. The only program that has done a systemic and comprehensive assessment of their local ID program is New York City. Summary results from the IDNYC evaluation and card usage data are presented below - while New York is not representative of Columbus, these data shed some light on what features and benefits are most likely to be valuable to local ID cardholders.

### **Why did people get the IDNYC?**

In a scientific survey of IDNYC cardholders conducted after the first year of the operation of the program, respondents gave the following reasons for obtaining the card (respondents could choose more than one reason) (Daley, Lunn, Hamilton, Bergman, & Tapper, 2016):

- 71% of respondents obtained the IDNYC to “support the program”

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- 68% of cardholders stated they got the card to access membership benefits
  - 61% of respondents indicated they got the IDNYC to have an “official ID,” while 59% of respondents stated that they got the card to have a “preferable ID”
  - 13% of respondents indicated that getting the card was important because it allowed them to indicate a preferred gender, while 31% of transgender or gender non-conforming respondents reported that this was an important reason
  - 10% of cardholders got the card to access public benefits or city services: “Among survey respondents who have used IDNYC to access City services, 39% reported that the card had greatly helped them receive the services, and an additional 33% indicated that it had somewhat helped them” (Daley, Lunn, Hamilton, Bergman, & Tapper, 2016)

Somewhat surprisingly, the most common reason people gave for obtaining the IDNYC was because they liked the idea of having an ID program and they wanted to support it. This finding aligns with another survey finding that getting the IDNYC gives cardholders a stronger sense of connection with the city. Specifically, 77% of foreign-born New Yorkers and 58% of American-born New Yorkers reported that obtaining the IDNYC had “increased their sense of belonging” to the city. These findings are partial evidence that the IDNYC is accomplishing its goal of providing identification, useful benefits, and a sense of connection to the city (Daley, Lunn, Hamilton, Bergman, & Tapper, 2016).

### **How do New Yorkers use the IDNYC?**

The IDNYC survey also found the following about how respondents reported using the card or the popularity of certain card features after the first year of operation of the program (Daley, Lunn, Hamilton, Bergman, & Tapper, 2016):

- 73% of those surveyed indicated that they had included an emergency contact on their card, with 85% of youth using this feature
- 52% of respondents reported using their card to get a membership or to visit a cultural institution, with 67% of seniors and 63% of those identifying as transgender or gender non-conforming - the two highest reported groups using of this benefit
- 24% of respondents indicated using the card for [accessing library materials]. “Use of IDNYC as a library card was especially noted [as valuable] in focus groups drawn from immigrant communities”

- 14% of cardholders chose to be organ donors, with 25% of those who signed up to be an organ donor indicating that they were not a donor prior to enrolling in the IDNYC. This means there could be as many as 30,000 new organ donors as a result the IDNYC program after its first year of operation
- 12% of IDNYC cardholders reported “using the card as a form of identification for opening a bank account”

Another comprehensive source of data for the usage of the IDNYC are quarterly reports to the Mayor. Table 1.4 shows how New Yorkers have actually used the IDNYC for various purposes since it launched in January 2015 and through September 2018.

Table 1.4

*Use of Various IDNYC Cardholder Benefits, January 2015 - September 2018*

<b>Benefit</b>	<b>Number Using</b>	<b>% of Adult Cardholders</b>
<b>Free Membership to Cultural Institution</b>	635,447	50%
<b>Library Functionality Enabled</b>	82,740	7%
<b>Purchased Discounted Tickets to Events, Shows, Landmarks, and Performances</b>	72,961	6%
<b>Discounted Fitness and Recreation Fees</b>	37,569	3%

**Source:** Banks, Mostofi, and Thamkittikasem, 2018

In addition to the benefits shown in Table 1.4:

- 4,702 cardholders (less than 1%) have linked their IDNYC card to their Health & Hospitals account
- 2,564 cardholders have used their IDNYC number to access vaccine records
- 9,019 veterans have the veteran designation on their card (an option available since July 2015), which allows them to easily obtain benefits reserved for veterans.

Additionally, IDNYC cardholders have saved \$807,751 on prescriptions and \$1,851,184 on groceries due to discounts available to IDNYC cardholders (Banks, Mostofi, and Thamkittikasem, 2018).

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## Impact on Law Enforcement Interactions

One of the most common reasons why communities adopt a local ID program is to increase the number of individuals who have an ID when they interact with local police officers and sheriffs. In fact, in communities like New Haven and Trenton, NJ, city leaders launched cards in response to specific criminal acts against foreign-born residents who were targeted, at least in part, because criminals knew that their victims and potential witnesses were unlikely to want to interact with law enforcement officials (Kalet, 2013; MacMillan, 2012). While systematic, longitudinal studies are lacking, there is some concrete, anecdotal evidence from communities indicating that local ID cards have a positive impact for cardholders, law enforcement, and public safety:

- **New Haven:** After running its program for five years, New Haven reported a significant increase in crime reporting and a drop in crimes committed. Assistant Chief of Police Luiz Casanova noted, “Since the card was introduced, crime reporting has increased in New Haven, yet there were double-digit drops in every category of crime. Overall, the card has improved interactions between police and undocumented residents and has played an important role in building relationships and respect. People are less intimidated to talk to police. Traffic stops became more efficient because we were able to ID people pretty quickly.”

New Haven police also reported that “The re-entry population also really uses that ID card,” People come out of prison, they have no license, but they can get an Elm City Resident Card. “It’s a great tool for us” (Fleck & Moody, 2014; MacMillan, 2012).

- **New York City:** Focus group participants in the IDNYC evaluation commonly reported that having the local ID card “brings a sense of relief and reassurance when dealing with the police. While encounters with police were not a concern for approximately 45 percent of survey respondents, among those who did report concerns, 59 percent indicated that having the IDNYC card makes them feel more confident about potential encounters with officers” (Daley, Lunn, Hamilton, Bergman, & Tapper, 2016, p. 34).
- **South Bend:** The Director of the South Bend ID program stated that police have found the program to be beneficial because more individuals are able to produce a valid ID after the implementation of the SBID program (S. Centellas, personal communication, August 29, 2018).
- **Washtenaw:** Washtenaw County Sheriff Jerry Clayton was instrumental in pushing legislation for the county ID program. He knew the difficulties people faced without an ID, and the challenges a lack of ID created for his sheriff’s deputies. In addition to mandatory arrest policies, a lack of an ID made it difficult for staff to help residents with discharge planning from the Washtenaw County jail.

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The Washtenaw County Sheriff's Office stated that the County ID program has benefitted patrol. If an officer is given a County ID card, they can easily run the name and birth date through dispatch to get additional information about the individual. However, if someone has no ID, then they have to be brought in if the deputy wants to determine their identity.

The Washtenaw County Sheriff also collaborated with Synod Community Services and the County Clerk's Office and Register of Deeds to ensure that all jail inmates had ID before they are released. This initiative has allowed residents re-entering from jail to have increased access to resources and support services. As of December 2018, 55 Washtenaw County ID cards have been issued to people in jail (R. Wilson, personal communication, December 7, 2018). Washtenaw also reports that the ID program has been a significant benefit to the mission of the community corrections division: A Department representative said, "Because of the ID, people re-entering from jail have increased access to resources and support services," which makes it less likely they will recidivate (R. Wilson, personal communication, December 7, 2018).

## Best Practices

This subsection details best practices for creating a local ID program that should be considered if the City of Columbus chooses to create a city ID program.

**1.1 - Columbus should have specific populations in mind as key beneficiaries of a local ID before launching it.** While almost all programs have benefits that appeal to all residents, these benefits are secondary to the primary purpose of helping individuals who would otherwise lack identification. Identifying the key populations the city seeks to help with a city ID should then guide decisions about what features and benefits the card should have and help the city communicate with the relevant populations. This focus is also important for establishing goals for assessing the success of the program - *See Section 3 for more details on how other local governments engaged community organizations and diverse populations in the planning for and implementation of their local ID card programs.*

**1.2 - Work to develop partnerships with businesses, cultural institutions, and other entities to create a card that both benefits the partners and offers benefits of interest to city residents who already have a government-issued ID.** Developing robust partnership benefits is critical for attracting residents to a city ID program, so that the card is not viewed as simply a card for members of particular vulnerable populations - *see Section 3 for details on engaging community members and organizations in the development of the card.*

In working to develop partner relationships, it is also critical to think about how the partnership will be of benefit to a business or cultural institution. For example, Pittsburgh studied creating a city ID card and found that many cultural institutions would be reluctant to offer another discount because they already offer discounted admission to various groups and they did not see offering another discount as a major

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draw. The Pittsburgh study recommended working with local businesses and organizations to develop special promotions for partners. Examples included offering free admission to city ID cardholders one day per month, or offering a temporary free membership with the hope that this would attract new members (City of Pittsburgh, 2016).

Similarly, SF Global, which has helped start and implement several local ID programs, has found that it is important to provide ongoing reasons for partners to continue to be engaged with the local ID program. To help cities keep local businesses engaged and to show a concrete benefit to the ID program participation, SF Global planned to launch an app in 2018 that allows partners to offer tailored discounts to cardholders who are near the business. This provides a tool for partners to attract cardholders and see the value of the partnership with the program (J. Suriano, personal communication, November 19, 2018).

It is also important to help prepare partners for the challenges that may arise out of successful partnership efforts, particularly in the first year of the program. For example, “for many museums, participation as an IDNYC benefit partner has resulted in a large influx of new members, including increases in visits from New Yorkers living in areas of the city that are outside the usual membership base. This influx has been a challenge for some of the institutions to manage, particularly a number of the smaller museums that have had to hire staff to handle processing of memberships” (Daley, Lunn, Hamilton, Bergman, & Tapper, 2016, p. 35).

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## Section 2 – Key Action: Ensuring Information Security, Card Integrity, and Privacy

This section details key steps a city can take to ensure the security, integrity, and legitimacy of its ID program. Ensuring information security, card integrity, and applicant privacy are critical for a successful local ID program for two key reasons:

- **Card legitimacy within the community:** A card will not appeal to vulnerable populations if they lack confidence that their information will be protected and not misused.
- **Support and acceptance by law enforcement:** All local communities highlighted the importance of involving law enforcement personnel in the planning and decision-making process for an ID program, particularly for ensuring the authentication process and card integrity.

For example, Detroit changed the requirements for acceptance of certain identification documents in light of law enforcement concerns (P. Takas, personal communication, November 20, 2018). Drawing on law enforcement expertise helps ensure the integrity of the program and its legitimacy with local law enforcement. This is critical if one of the goals of the program is to have the local ID recognized and accepted as a valid ID by local law enforcement personnel and agencies.

**What documents should be accepted as evidence of identity and residency?** The first critical security decision a local government will make is determining what documents will be accepted as evidence of an individual's identity. Less critical, but still important, is evidence of residency. These decisions are primarily a tradeoff between accessibility and security or accuracy of identification and residency. While local ID programs vary in the documents they accept to establish the applicant's identity, they all follow a similar points scheme for meeting the threshold of providing sufficient documentation that is required to add up to three points (or three hundred points). Communities require individuals to provide one document or a combination of documents that provide a photo image of the applicant, their name, and a birthdate. Yet, each community has made different choices as to what balance it wants to strike based upon the goals of the program, available resources, and the risk tolerance of each community.

For example, New Haven only accepts three types of documents as sole proof of identity (they may not be expired):

1. Passport
2. Driver's License issued in the U.S.
3. Consular Card

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New Haven will also accept a combination of two of the following document types as proof of identity:

1. National Identification Card if it includes photo, name, address, date of birth, and expiration date
2. Foreign Driver's License
3. Voter registration card with birth certificate
4. U.S. or Foreign Military Identification Card with birth certificate
5. U.S. Travel Visa
6. Individual Taxpayer Identification Number Card with photo identification

Source: [https://www.newhavenct.gov/gov/depts/vital\\_stats/elm\\_city\\_resident\\_card.htm](https://www.newhavenct.gov/gov/depts/vital_stats/elm_city_resident_card.htm)

New Haven has confidence in accepting these documents because they have been issued by other governments at “a higher level” with relatively stringent issuance requirements. In addition, limiting the documents accepted makes it easier for staff, who have to review the documents and process the applications. For instance, in New Haven, the vast majority of foreign documents are from Guatemala or Mexico, so staff training can focus on understanding what passports and IDs should look like from the State of Connecticut, Guatemala, Mexico, and the U.S. (L. Wilson, personal communication, August 22, 2018).

In contrast, many other local governments – like Chicago, New York City and Washtenaw County – accept a broad variety of documents to establish identity. For example, New York City will accept at least 16 documents as sole proof of identity and will accept certain expired documents, such as an expired New York State Driver's License and U.S. Passport that expired within the last three years.

Similarly, there are combinations of more than 40 other documents that can be provided together to meet the identity and residency documentation requirements for the IDNYC – see [www1.nyc.gov/site/idnyc/card/documentation.page](http://www1.nyc.gov/site/idnyc/card/documentation.page).

To maximize the accessibility of the Washtenaw County ID card, the county will accept an affidavit of identity for some individuals who do not have other forms of documentation. This helps make the card accessible to individuals who are homeless or whose birth certificate and other documents were lost in a fire (E. Golembiewski, personal communication, September 19, 2018). A typical example is that a social worker or mental health professional working with a homeless individual who does not have the necessary documentation would sign the affidavit of identity and come to the application center with the applicant to attest in person to its accuracy (L. Sanchez, personal communication, November 20, 2018).

There are similar differences in requirements for documentation of residency. New Haven permits six types of documents as evidence of residency, and an individual must provide two different types. Conversely, New Yorkers can provide one document of more than 40 acceptable options, including letters attesting to an individual's residency.

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## *Success at preventing and detecting fraud and abuse*

All communities have instituted multiple measures to ensure the integrity of the application process and their ID cards. These steps seem to have been successful. The communities researched have not suffered any known, significant, incidents of fraud or misuse within their programs. For example, “since the [IDNYC] program’s launch in January 2015, 180 cases of suspected fraud have been identified,” which represents .0000001% of all applications (Banks, Mostofi, and Thamkittikasem, 2018).

The lack of fraud and misuse is not surprising given the steps communities have taken to protect the integrity of their programs. For example, “San Francisco has not had issues with counterfeited IDs... [because] the software used by the city prevents individuals from applying for multiple IDs under different names. The card contains overt and covert security features including laser engraving. The city also uses a biometric scanner to issue the card” (Fleck & Moody, 2014). Chicago, Detroit, and New York take similar steps to prevent counterfeiting and fraud.

Another reason why abuse is not a major issue is that typically there is no major benefit to fraudulently duplicating or altering a local ID card. The only obvious major potential benefit is if the card has a birthdate on it that underage individuals would want to use to purchase alcohol or tobacco products.

### **Best Practices**

This subsection describes best practices for ensuring the security and integrity of a local ID program that should be followed if the City of Columbus chooses to create a city ID program.

#### **2.1 - Decide what documents to accept based upon what populations the program is focused on helping and undertaking an assessment of the needs of those populations in the community.**

For example, New Haven determined that many of the individuals it wanted to help were foreign-born residents, particularly Yale students, who have passports and/or consular cards, but who did not want to have to carry around these types of identification because they can be difficult and expensive to replace. Therefore, it made sense for New Haven to focus on accepting documents commonly held by foreign-born residents (L. Wilson, personal communication, August 22, 2018).

Similarly, IDNYC card holders who are foreign-born residents reported that the ID card was their preferred ID because it was easier to replace if lost, and because it “conveys no information about one’s country of origin and implies nothing about legal status.” Twenty-five percent of all IDNYC cardholders report that the card is their only U.S photo identification, with 79% of these respondents being foreign-born residents (Daley, Lunn, Hamilton, Bergman, & Tapper, 2016, p. 20 & 27).

The City of Detroit, New York City, and Washtenaw County started their local ID programs with a goal of helping vulnerable adult populations, such as the elderly, restored citizens, and individuals who are homeless. In New York, cardholders who were homeless commonly mentioned a preference for IDNYC over the Electronic Benefit Transfer (EBT) because the EBT card is not recognized everywhere, does not have an address on it, and they find it embarrassing to show publicly (Daley, Lunn, Hamilton, Bergman,

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& Tapper, 2016, p. 22). The purpose of helping homeless individuals has led to the decision to accept affidavits of identity and/or residency in lieu of other documentation (L, Sanchez, personal communication, November 20, 2018; P. Takash, personal communication, November 19, 2018).

## **2.2 - Take into account the resources the city plans to invest in the program when making a decision about what documents to accept.**

The number and types of documents accepted will affect the application process and the cost of implementing the program. The more documents accepted the more training and support resources needed to help ensure an accurate and timely authentication. The number of documents accepted can also affect processing time and satisfaction with the process, which can drive technology choices. For example, some cities have purchased driver's license and/or passport readers to enhance and expedite document authentication. This type of equipment can be expensive – *See Section 5 for details on estimated costs for implementation.*

## **2.3 - Adopt best practices for identity and residency authentication.**

“The document authentication process is... [a critical] component of card security. Staff should be trained in document review and provided with the necessary equipment and information to evaluate document authenticity” (Center for Popular Democracy, 2015, p. 15). If the city were to adopt a local ID program, it should adopt best practices for verifying identity and residency of applicants.

While there is some variation, most cities have adopted a similar identity authentication process based upon the Know Your Customer Model used by banks to comply with U.S. Government laws and regulations (J. Suriano, personal communication, November 19, 2018). For example, “The PATRIOT Act’s Customer Identification Program mandates that financial institutions implement institutional policies to verify the identities of their customers” (LeBron, Cowan, Lopez, Novak, Temrowski, Ibarra-Frayre, & Delva, 2018). Specifically, “all banks must have a written Customer Identification Program (CIP) sufficient to enable the bank to form a reasonable belief that it knows the true identity of each customer. At a minimum, the bank must obtain the following identifying information from each customer before opening the account: name, date of birth, and address (Washtenaw ID Task Force, 2014).

“While the CIP rule gives examples of types of documents that have long been considered primary sources of identification, the rule reflects an expectation that banks will review unexpired government-issued forms of identification. The identification must provide evidence of a customer’s nationality or residence and bear a photograph or similar safeguard. While the common examples of a driver’s license or passport are cited, other forms of identification may be used if they enable the bank to form a reasonable belief that it knows the true identity of the customer” (Washtenaw ID Task Force, 2014).

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The typical application process consists of at least two steps:

1. **Identity and Residency Authentication:** The card applicant takes their completed application and identity and residency documents to a document reviewer, who goes over the application and reviews the documents to assess their authenticity. If the identity and residency documents are determined to be authentic based upon physical examination of the documents, the application goes forward to the next step. For example, “In New Haven staff received training from foreign consulates on authenticating foreign documents, and they are provided with a reference guide depicting and describing the range of documents that they may encounter” (Center for Popular Democracy, 2015, p. 15). Staff in larger cities often has access to online databases and/or digital readers to assist with document authentication.

At this stage, the applicant’s photo is taken with a neutral face and their signature is obtained. The signature is important to have on file for legal reasons, such as to show proof that the applicant reviewed and approved the accuracy of the ID card information or agreed to be an organ donor (J. Suriano, personal communication, November 19, 2018; C. Samman, personal communication, October 23, 2018).

*Additional Authentication Efforts:* Many communities’ identity and residency authentication is limited to the physical examination of documents. However, larger communities often incorporate additional authentication efforts. For example, Detroit will check databases and make phone calls to applicants to verify the accuracy of key identity information, such as birth date and social security number – the application does not require that a social security number be provided (J. Suriano, personal communication, November 19, 2018).

In New York, an IDNYC Fraud Specialist, with specialized training in document fraud, reviews the documents again for signs of tampering, fraud, or forgery. These specialists will also make phone calls to verify that an individual actually lives at the address provided (C. Samman, personal communication, October 23, 2018).

*Process Efficiency Step:* In many communities, an applicant checks in with a clerk or volunteer who makes sure that the applicant has the necessary identity and residency documents, can answer key application questions, and/or meets application qualifications. This review can help make the process more efficient and effective by preventing individuals without the proper documents from waiting in line for the document review. Also, this preliminary review can be completed by individuals with minimal training and free up time for the more highly trained document reviewers. This approach is particularly important after the launch of a program, or for application centers that are busy due to a high number of applicants or because the center provides other services for residents (S. Daly, personal communication, October 23, 2018; S. Centellas, personal communication, August 29, 2018).

2. **Application Decision and Card Issuance:** After the document review, a decision is made about the application. If it is approved, then, the card is issued. Some communities print ID cards onsite

while the applicant waits, but other cities mail the cards to the applicant. Mailing the ID card provides several benefits, including:

- Avoids potential confrontations with applicants who are denied a card
- Provides time to conduct additional authentication steps
- Serves as another step for confirming accuracy of residency information

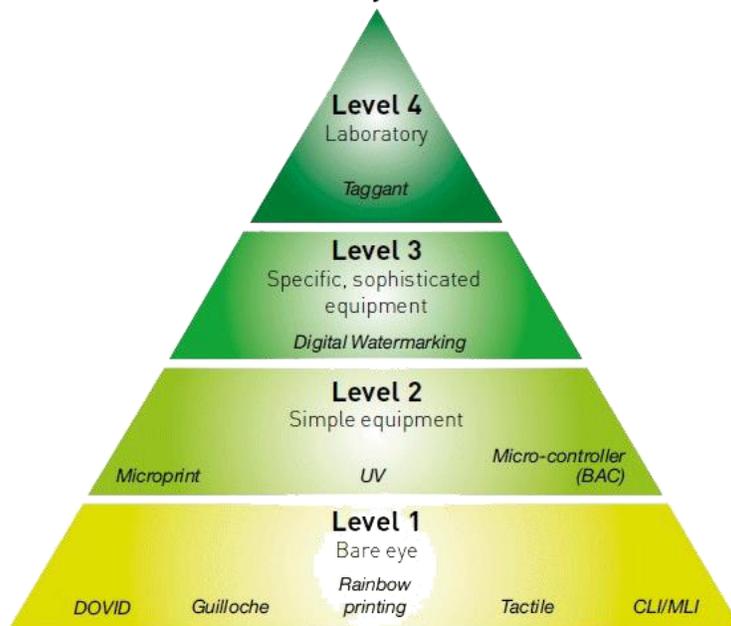
(S. Centellas, personal communication, August 29, 2018; S. Daly, personal communication, October 23, 2018; C. Samman, personal communication, October 23, 2018; J. Suriano, personal communication, November 19, 2018)

Communities that mail out cards make alternative arrangements for individuals without stable housing or who otherwise do not want a card mailed to their home address, including allowing individuals to pick up the card at an application center or delivering to a community organization location for pick up.

**2.4 - Ensure the ID card has strong security features by incorporating at least multiple level one security features.**

A well-designed and -produced identification card is also important for ensuring the security and legitimacy of the card program. Security experts define four levels of security for a document such as an ID (see Figure 2.1).

Figure 2.1  
**Pyramid of security levels**



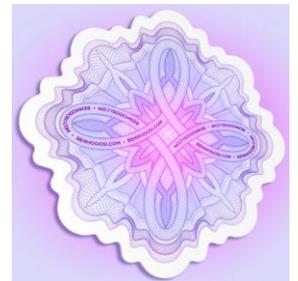
Source: [Gemalto, 2018](#)

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The different levels of security represent increasingly difficult features to duplicate or alter and more sophisticated methods for detecting if a card is legitimate:

**Level One:** Overt security features easily checked by visual inspection or touch. The main principle of these security features is that fraud is easily detected “with close attention paid to alteration of personal information.” Incorporating these features makes the document hard to copy and produce. (Gemalto 2018). Examples of level one features include:

- Changeable or Multiple Laser Image (CLI/MLI) - “A variable laser image is a laser-engraved image with tilting effects, incorporated in plastic cards: images are engraved at different angles through an array of cylindrical lenses embossed into the surface of the card. The image that can be seen changes depending on the angle of view” (Biztonsagi Nyomda, n.d.).
- Diffraction Optically Variable Image Devices (DOVID)s - such as a hologram.
- Gilloche - “A pattern of subtle thin lines interwoven according to the rules of geometry. It includes all wavy decorative lines and graphic patterns,” which help prevent counterfeiting (benhodosi.com, n.d.).
- Rainbow Printing – This is used to protect security documents against copying by subtly merging colors into each other, resulting in a gradual color change” (Biztonsagi Nyomda, n.d.).
- Security Paper - Specialized card stock materials that are hard to obtain and more difficult to use.
- Tactile Printing - Features on the card that are felt through touch and prevent the ability to alter or reproduce the card without damaging or eliminating the tactile feature (ID Card Group, n.d.).



**Level Two:** Security features that can be checked with relatively simple devices, such as magnifiers, UV-lamps, or radio-frequency identification (RFID) receivers.

**Level Three:** Security features, such as digital watermarks that can only be detected with relatively sophisticated equipment designed to detect that specific feature.

**Level Four:** A sophisticated, unique, and often secret security feature that is detectable only with specified equipment, such as a taggant, which is uniquely encoded material or chemistry that is virtually impossible to duplicate (MicroTrace. n.d.).

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Local communities “have incorporated a range of security features, including:

- Card is made of certain stock thickness and material
- Card stock inventory is laser engraved with a serial number
- Fine-line pattern background
- Embedded watermark
- Foil stamp of city seal
- Ultraviolet Ink
- Holograms
- Tamper-proof magnetic stripe
- Tamper-proof signature pane”

(Center for Popular Democracy, 2015, p. 14)

All the programs reviewed for this study have cards that meet at least level one security, and many meet level two security. A combination of multiple level one security features is likely sufficient to meet the needs of a local ID card, though incorporating one or more level two features is quite common and not typically too expensive. In contrast, adding level three and four features can be cost prohibitive due to the need for specialized equipment and/or training for staff. For example, it can add \$100,000 to equipment start-up costs to incorporate laser engraving on a card (J. Suriano, personal communication, November 19, 2018).

## **2.5 - Protect the privacy of cardholders and applicants**

“Creating a new form of government-issued ID requires establishing trust with all stakeholders. Confidentiality and program security are central to building this trust. First, without assurance that their data is secure and confidential, residents are likely to be hesitant about applying for a card, particularly residents from vulnerable populations. Second, without assurance about program integrity and fraud resistance, government and private entities, such as banks, [will be reluctant to accept the card as valid form identification], reducing the card’s utility” (Center for Popular Democracy, 2015, p.12).

### *Ohio’s Public Records Laws*

The extent to which a community can and should go to protect cardholder information depends on the laws of the state and the concerns and expectations of the populations the city wants to assist with the local ID program. Ohio has strong public records laws that make it likely that documents created as a part of a local ID program would be subject to public inspection.

For example, the Ohio Auditor of State (2018, p. 28) notes, “In Ohio, the public records of a public office belong to the people, not to the government officials holding them. Accordingly, the public records law must be liberally interpreted in favor of disclosure, and any exemptions in the law that permit certain types of records to be withheld from disclosure must be narrowly construed.”

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Still, there are exceptions under the Ohio Public Records Law and U.S. Government laws and regulations that would prohibit certain information used for a city ID program from disclosure requirements. Exempted information that could be relevant for a city ID program includes:

1. “Information pertaining to the recreational activities of a person under the age of eighteen, such as address, telephone number, birthdate, or photographic image
2. The confidential name, address, and other personally identifiable information of a program participant in the Secretary of State’s Safe at Home Confidentiality Program established under O.R.C. 111.41 to R.C. 111.47, which is designed to “assist victims of domestic violence, stalking, human trafficking, rape, or sexual battery by shielding their personal information from public record”([www.sos.state.oh.us/secretary-office/office-initiatives/safe-at-home/#gref](http://www.sos.state.oh.us/secretary-office/office-initiatives/safe-at-home/#gref)).
3. Medical records
4. ‘Personal information,’ including an individual’s social security number; state or federal tax identification number; driver’s license number or state identification number; checking account number, savings account number, credit card number, or debit card number; and demand deposit number, money market account number, mutual fund account number, or any other financial or medical account number
5. Records the release of which is prohibited by state or federal law, such as social security numbers” (Ohio Auditor of State, 2018)

### *Protecting ID Applicants Information*

Columbus should take the purpose of the program and the requirements of Ohio law into account when developing policies and procedures for the processing of applications and records maintenance. The surest way to maximize the privacy of applicant and cardholder information is to not retain applicant documents and minimize any personal information maintained.

In fact, “many local government ID card programs around the country have prohibited the copying or retention of documents presented to prove identity or residency:”

- Mercer County (NJ), New Haven, San Francisco, and South Bend programs do not copy or retain application documentation.
- San Francisco, Newark, and Hartford “have included language in their municipal ID legislation forbidding the retention of any underlying application documents, including copies, in the administration of the program” (Center for Popular Democracy, 2015, p. 10).

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- Chicago reviews, but does not retain, applications and its CityKey database includes the ID#, issuance date, expiration date, and zip code only if applicants choose to provide it (K. LeFurgy, personal communication, August 23, 2018)
  - The City of South Bend chose not to administer its own card in large part because of concerns about not being able to keep cardholder information confidential under Indiana’s public records laws (S. Centellas, personal communication, August 29, 2018).

“There is often no need to keep copies of application documents. In most cities, program staff are trained in document review. Applicants present their proof of identity and residency; staff members authenticate the documents there on site and then return them to the applicant. The only information that the administering agency keeps on file is the information contained in the application form. This information, though less sensitive, should also be closely protected. The number of staff who have access to it should be limited, and the database in which it is stored should not be linked to any other databases” (Center for Popular Democracy, 2015, p.11).

However, some cities choose to keep records for operational purposes and quality assurance. For example, Detroit and New York City conduct audits of program records to ensure compliance with policies and procedures and to identify staff training needs. Except for audit purposes, Detroit does not keep identity documents, though it does keep the information on application forms for the two years that the ID card is valid (D. Bowser, personal communication, August 28, 2018; C. Samman, personal communication, October 23, 2018).

If a city chooses to “keep copies of underlying application documents, there are ways to mitigate the potential harms to applicants including limiting the types of documents that may be retained,... requiring that retained documents be destroyed after a [limited] period of time; and requiring the city to issue a public report every quarter listing all requests for access to the data that it has received from any third party and an account of how each request was handled” (Center for Popular Democracy, 2015, p.11).

Whatever the city chooses in terms of data collection and document retention, the city should clearly establish and communicate its privacy policy by writing privacy protections into the enacting ordinance and promoting the policy. According to the Cities for Action report (2015)<sup>7</sup>, key privacy issues and questions to address in a local ID program ordinance include:

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<sup>7</sup> “Cities for Action (CfA) is a coalition of over 100 mayors and municipalities that are leading the effort to support stronger, safer and more economically prosperous cities and counties through immigration action.” CfA held a Municipal ID Conference in 2015 and produced a Municipal ID Program Toolkit with best practice recommendations for operating a local ID program.

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## **DATA COLLECTION**

- What data will the program collect about applicants and cardholders?
- What are the reasons for collecting and maintaining this data?
- How sensitive is it? How long will it be stored?
- CONSIDER: Not requiring applicants to provide immigration status or data that relates to immigration status (such as Social Security numbers or place of birth).

## **DATA SECURITY**

- How will applicant and cardholder data be stored?
- Will it be integrated with other data?
- Who will be permitted to access the data?
- How will the applicant and cardholder data be transmitted?
- How will the program minimize unauthorized access and disclosure of applicant and cardholder personal information?
- CONSIDER: Applying the strictest standards from local data security regimes for program data.

## **THIRD-PARTY ACCESS**

- How will the program handle requests for applicant and cardholder data from entities within local government; from local, state, and federal law enforcement (including immigration enforcement); and from other third parties?
- Under what circumstances will the program share personal identifying information, and under what circumstances will it decline to do so?
- Will individuals be notified if their personal identifying information has been requested?
- CONSIDER: Utilizing a standard that discloses applicant data only when required by law and providing individuals with an opportunity to contest the disclosure of their data.

## **APPLICATION AND VERIFICATION**

- What are the eligibility requirements for the ID card?
- How and where do applicants apply?
- How will the program verify an applicant's identity and eligibility for the card?
- How will the program prevent an individual from obtaining more than one card or a card in someone else's name?
- What vendors and personnel will be required for verification and investigation, and how do they support overall card security?
- What aspects of the verification and investigation process will be made public?
- CONSIDER: Investing in a robust verification and investigation process to protect program integrity while ensuring that your program is accessible.

## **CARD SECURITY**

- What will the card look like? What information will it contain? What security features?
- Where will the card be printed, and how will it be distributed to applicants?

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- **CONSIDER:** Designing a card that incorporates multiple security features for fraud prevention and mailing the card to applicants at the address provided on their application as an extra verification of residence.

### **ADDITIONAL CONSIDERATIONS**

- Consider what privacy and security protections you can include in legislation.
- The public and program partners will be interested in how the security system functions.
- Consider when cards will expire and what documents people will need to renew the card.
- Think about what data you would want access to after implementation, and how to get that data while ensuring privacy.
- Should there be penalties or fines for submitting false documents or application information, attempting fraudulent duplication, or otherwise misusing a local ID? Chicago's program states that "persons who make material false statements may be fined not less than \$500, and not more than \$1,000, plus three times the City's damages, litigation costs, collection costs, and attorney's fees pursuant to Section 1-21-010 of the Municipal Code of Chicago" (City of Chicago, n.d.). Detroit's municipal ID ordinance makes similar offenses a misdemeanor (Detroit City Ordinance No. 18-16, 2016).

### **2.6 - Ensure to train staff on security measures**

Well-trained staff are the most critical part of ensuring the security and legitimacy of the card and protecting the privacy of card applicants. Communities reported providing various amounts of training regarding processing applications, reviewing documents, and using technology:

- In Detroit, new staff receive two weeks of onboarding and they learn the details of the application process, how to verify documents, and how to review document samples. They also work with an experienced person (J. Suriano, personal communication, November 19, 2018).
- In New York, the training was originally six weeks because the program had just launched and all staff were new. Now, new document reviewers get one week of training and then they work with an experienced reviewer for one or two days. Fraud specialists have additional experience or receive additional training (C. Samman, personal communication, October 23, 2018).

Many communities rely on local government departments, local banks, embassy personnel in the area, and other community resources to provide training at little or no cost. For example, NYC document reviewers get training by police and city fraud specialists (C. Samman, personal communication, October 23, 2018).

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## **2.7 - Audit the Application Process**

It is a good practice to regularly audit applications selected at random or because specific concerns have been identified. These audits can help ensure compliance with proper security procedures and identify staff training needs or individual staff performance issues that should be addressed. Both Detroit and New York City perform audits on a regular basis. Effective auditing requires documenting the process. For example, if identity documents are maintained, one can audit if accurate and legitimate documents were reviewed when making a decision. The benefits of conducting audits should be balanced with security and privacy concerns related to maintaining applicant documents. In Detroit, randomly selected transactions are chosen and the documents are kept for audit purposes. However, the documents are destroyed after the audit is completed, as normally Detroit does not keep identity documents (P. Takash, personal communication, November 19, 2018; C. Samman, personal communication, October 23, 2018).

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## Section 3 – Key Action: Involving Community Organizations and Law Enforcement

In order to have a successful community ID program, engage a diverse group of stakeholders from the beginning of the process. Additionally, communities should work with outreach partners to reach key stakeholders and disseminate information about the program. An ubiquitous best practice is to engage community partners early and often, through one-on-one meetings, tasks forces, coalition building, trainings, and regular briefings (Cities for Action, 2015). Focus groups are a particularly effective way to identify challenges faced by people without an acceptable ID and informed community administrators about the types of documents that are difficult for people to obtain.

The availability of documents differ from “place to place depending on such factors in the local population as age, nationality, immigration status, and degree of contact with the criminal justice system, as well as geographic factors such as accessibility of foreign consulates and the quality of public transportation” (Center for Popular Democracy, 2015, p.12). Many local ID programs created mobile units to travel to communities with residents who have limited access to transportation, in part because they learned about these difficulties through focus groups.

In short, well design focus groups can help elicit critical information for the success of a local ID program. Specifically, Chicago, Detroit, New York, San Francisco, and Washtenaw County held focus group interviews:

- Focus groups held in Chicago found the 1) Although Illinois has a driver’s license for undocumented immigrants, it cannot be used for identification with police and others, 2) Foreign-born residents would rather not carry around their consulate card, 3) A city ID could benefit additional residents, including those re-entering from incarceration, homeless residents, veterans, and LGBTQIA populations, and 4) In order to obtain an Illinois state ID, residents must have a social security number and a birth certificate, which could be difficult for certain residents to obtain.
- Detroit’s focus groups found that it was often difficult for homeless and recently-incarcerated residents to access services without an ID (P. Takash, personal communication, November 19, 2018).
- Washtenaw County found that residents could not access healthcare services or retrieve prescriptions from pharmacies without an ID.
- New York found that parents may not enter their children’s schools without an ID. Using findings like these from task forces and focus groups, several communities established ID programs with provisions to ensure that vulnerable populations would have access to the community ID program.

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Community partnerships can also facilitate the successful implementation of local ID programs in a variety of ways. For example:

- **Detroit:** The backbone of the Detroit ID program is its relationships with service providers, which took about a year to build. Now the mobile application unit is out approximately five days a week enrolling residents at partner sites.
- **New York City:** Community organizations are actively involved with the IDNYC program by helping to promote the card and by hosting and assisting with enrollment pop-up sites (Daley, Lunn, Hamilton, Bergman, & Tapper, 2016).
- **Washtenaw County:** The nonprofit organization Synod Community Services is a critical partner with the county, helping with promotion and outreach. Synod assists residents with: 1) gathering appropriate documents; 2) ensuring that the application is completed completely; 3) taking ID photos of incarcerated individuals and others who are unable to get to the application center; 4) submitting completed applications for processing; and 5) returning ID cards and application materials to incarcerated individuals or other applicants who are unable to get their cards at the application center.

### **Involving Law Enforcement**

The communities interviewed stated that they received support from local law enforcement for their ID programs, and that a key step to gaining the support of law enforcement is to engage them in the process early and throughout the planning and launch:

- Chicago engaged law enforcement early in the development of the CityKey program, and law enforcement provided expertise and insight related to procurement, technology selection, and program rules and regulations. Local law enforcement in Chicago also held departmental briefings to educate officers on the ID program, using the message “any ID is better than no ID” (LeFurgy and Tonantzin, personal communication, August 23, 2018).
- Detroit engaged law enforcement early in the process of developing the Detroit ID program. Local law enforcement provided input on documents accepted for the card, the design of the card, and its security features.
- The Mayor of New York City championed the IDNYC program and collaborated with law enforcement early in the development of the program. The NYPD provided advice on fraud prevention protocols, eligibility requirements, proof of identity documents, and outreach. Assisting with the development of the security features of the card eased any concerns law enforcement may have had regarding the validity of the card. The NYPD modified the Patrol Guide to include IDNYC as an official form of identification (Daley, Lunn, Hamilton, Bergman, & Tapper, 2016).

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## **Best Practices**

This subsection details best practices for engaging the community in the development and implementation of a local ID program that should be considered if the City of Columbus chooses to create a city ID program.

### **3.1 - Engage community organizations in developing and implementing a card program.**

No local ID program can be successful without strong support and involvement from community organizations, particularly those that assist vulnerable populations. There are a variety of ways in which the city could engage community partners, including asking them to:

1. Assist residents in collecting documents for the local ID
2. Help review applications for the local ID program
3. Help promote and educate about the local ID program
4. Provide sites for mobile units and pop-up enrollment centers

One ID Columbus is a local coalition of community organizations that has indicated it would be willing to assist with some of the above activities, although the group does not want to take a lead role in administering a local ID program (One ID Columbus, personal communication, November 13, 2018).

### **3.2 - Involve law enforcement in developing a card program.**

Involve law enforcement early in the process of developing the card and should be engaged throughout the entire process. This should include updating policies and providing training on the local ID card. Cities that have included law enforcement early have obtained their support and benefited from their expertise in developing the design and security of the card.

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## Section 4 – Key Action: Marketing and Communication

Another key to the success of local ID programs is the development and implementation of a sound marketing and communication strategy. In order to do this successfully, it is critical that the community and targeted media outlets be engaged to reach key populations, taking into account the diversity of languages spoken in the community speak. The marketing campaign and corresponding budget should include traditional marketing material and non-traditional marketing material, such as art and graphic material that resonates with targeted populations across the community (Cities for Action, 2015, p. 19).

Marketing materials should consistently align with each other to establish a theme and brand of inclusion. Larger cities embraced mass marketing campaigns that generated broad appeal for the program and reduced any stigmatizing effect that the card may have for a particular population and/or community. In fact, programs that promoted the benefits of the community ID card were less likely to encounter concerns about a negative stigma associated with the card. Residents of New York were unaware that the original purpose of the card was to provide foreign-born residents with an identification card. The IDNYC marketing strategy is recognized as one of the most important contributing factors to the program’s success (Daley, Lunn, Hamilton, Bergman, & Tapper, 2016, p. 45).

Other jurisdictions (i.e. Chicago, Detroit, and Washtenaw County) embraced this approach when implementing their ID programs by promoting the benefits of the card to all residents rather than to a subpopulation. In order to develop a similar approach, a significant amount of time must be set aside to develop a marketing strategy.

Most communities recommend taking at least a year to develop and implement a branding/marketing strategy. The strategy should include everything from creating the logo and messaging used for the card to developing a media and communications plan used for promoting the card. It is best practice to use a select group of stakeholders to help develop the brand image for the card. The logo used for the community ID program should embrace a symbol that reflects the spirit of the community. For example,

Chicago



Detroit



New York



Washtenaw County (MI)



Uses the official city logo

While the messaging for the general population should promote the card as a way to connect residents to city services, also communicate specific benefits through appropriate channels to important sub-populations. For instance, Pittsburgh’s Bridge ID program proposes to emphasize the message that the

card allows residents to “connect to the city and simplify their day.” However, each subpopulation is planned to receive additional information about the specific benefits that are applicable to them. Pittsburgh embraced this approach because at promoting benefits for targeted populations on a large scale could risk building a stigma around the card and cardholders (Pittsburgh, 2016). Table 4.1 below summarizes important outreach strategies for different target populations and organizations.

Table 4.1  
*Outreach Strategies for Key Stakeholders*

	All Residents	Target Populations	Partners / Community Orgs	Elected Officials	Media	City Departments
In-Person Meetings		√	√	√	√	√
Community Outreach & Events	√	√				
Printed Material	√	√	√	√	√	√
Website & Social Media	√	√	√		√	√
Training			√	√		√
Paid Media (TV & Radio)	√	√			√	

Source: Pittsburgh, 2016

As summarized in Table 4.1, effective outreach means engaging the following stakeholders:

- **All Residents:** Aim most outreach at the general public (i.e. having a community ID allows residents to simplify daily life and show pride for the city/county).
- **Key Populations** – Target strategic outreach efforts at key populations for which the card will address a critical need.
- **Partners and Community Organizations** - Ongoing outreach should be aimed at partners and stakeholders. For example, communicate regular updates about the program to community organizations and business partners in addition to enrollment centers, city departments, and law enforcement.
- **Media** - Initial outreach should be aimed at the media to help spread the word about the program and to provide periodic updates on the program and its impact.

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- **Policy Makers/Elected Officials** – Inform and engage policy makers and elected officials through Initial and ongoing outreach, as they may become champions of the program help advance its success.
  - **City Departments** – Ensure ongoing outreach aimed at city departments involved with the community ID program to ensure a constant and consistent line of communication.

IDNYC is a good model for developing a marketing and communications plan (granted it had a relatively large staff, including eight multilingual outreach staff at launch eventually increasing to sixteen employees). Each staff member had some form of experience in community organizing. In an attempt to help them focus their efforts, staff received detailed demographic information on the neighborhoods to which they were assigned. They spoke with people, met with faith-based organizations, gave presentations, and participated in more than 1,400 community events (Daley, Lunn, Hamilton, Bergman, & Tapper, 2016).

Additionally, IDNYC collaborated with City Council members to rally small businesses to promote IDNYC, and established a hotline run by the Hispanic Federation, Linea Informativa. The hot line generated over 4,000 calls in a 3-week span. To date, IDNYC communicates with, and provides ongoing updates to, residents through its website, social media (i.e. Facebook and Twitter), and an email newsletter (Daley, Lunn, Hamilton, Bergman, & Tapper, 2016).

In addition to the grassroots marketing approach, IDNYC incorporated traditional strategies into its marketing campaign. IDNYC created and displayed advertisement in a variety of languages across numerous print and media outlets. The ads communicated a message of inclusiveness along with highlighting the benefits IDNYC. When cardholders were asked how they became aware of IDNYC, many noted TV ads, community organizations, and newspaper ads. Others reported hearing about it through subway ads, flyers, radio, churches, and the Internet. The variety of ways in which IDNYC cardholders learned about the program demonstrates the extent of the media campaign (Daley, Lunn, Hamilton, Bergman, & Tapper, 2016).

Although IDNYC can serve as a model for creating a robust marketing and communications plan, vulnerable populations may need additional reassurance on the validity and use of the card. Experience could cause potential cardholders to express doubt for the program and its benefits. Such doubt could include concerns about whether banks, museums, and other entities would accept the card. Therefore, a strong marketing campaign should include ongoing communication about the benefits, as well as the process for receiving the benefits. Additionally, create brochures, websites, and other marketing material that list the financial institutions that accept the card, businesses that offer discounts, and the process for obtaining memberships to various cultural institutions.

Research and experience consistently demonstrate the importance of communication and marketing to the ongoing success of any brand including ID cards. For example, Dittmann & Lagunes (2014) conducted

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a field experiment in New Haven, Connecticut, that examined the acceptance of the New Haven Elm City ID Card by store clerks relative to an unofficial ID card (i.e. “non-government-sanctioned personal identification purchased from privately owned companies”). Relevant findings from the Ditlmann & Lagunes study include:

- Store clerks declined the city ID as form of ID in 27% of transactions
- Clerks were more than twice as likely to ask for an explanation about the validity of the city ID card relative to unofficial ID
- The City ID Card was 9% more likely to be accepted as a valid form of identification than an unofficial ID card
- There was no significant difference in acceptance of the city ID card between Latinos and Anglos

A similar study conducted by LeBron, Cowan, Lopez, Novak, Ibarra-Frayre, & Delva (2018) examined 130 transactions conducted by seven individuals. It found that shoppers were asked for an ID in 63% of transactions, and that the Washtenaw ID was accepted in 92% of transactions.

Findings from the Ditlmann & Lagunes (2014) and LeBron, et al. (2018) study indicate the potential usefulness of a city ID as a form of identification, while also highlighting the importance of ongoing branding and promotion of the card with businesses and the public.

The Elm City ID was launched in 2007 with lots of promotion and media attention, but over the years public awareness has declined (L. Wilson, personal communication, August 22, 2018). This lack of awareness probably is why store clerks were more likely to require explanations about the card or declined to accept it more than one-quarter of the time. Conversely, the Washtenaw ID card was less than three years old when that study was conducted, which may be why the Washtenaw ID was more likely to be accepted by store clerks.

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## Best Practices

This section describes best practices for marketing and promoting a local ID program that should be considered if the City of Columbus chooses to create a city ID program.

### 4.1 - Implement diverse marketing tactics:

- Website
  - Create a separate website for the community ID program, or, at least, designate area on the city's website for it.
- Outreach Events
  - Host strategic informational sessions in a variety of locations across the community to inform the residents about the program. Additionally, outreach teams should create a list of community events and either obtain a table at those events, and/or obtain permission to distribute handouts during those events.
- Social Media Strategy
  - Information can be easily disseminated through social media outlets. Facebook, Twitter, and Instagram are all good social media outlets for disseminating information about the program.
- Educational Materials
  - Develop a toolkit and/or a webinar for partners to learn how to use the card for proper identification.
- Branding Materials
  - Several items can be used as promotional material, including, fact sheets, document templates, brochures, infographics, social media graphics, window decals, card sleeves, bumper stickers, and *PopSockets*.

**4.2 - Identify different messages' key points to emphasize with different populations.** The City of Pittsburgh study (2016) recommended the following messages for different groups:

#### African Americans

- Access discounts to local businesses
- Access discounts to city services
- ID is relatively inexpensive
- ID is a valid form of identification
- Minimizes the number of cards one has to carry

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### Formerly Incarcerated

- ID is a valid form of identification
- ID is relatively inexpensive
- Access to city services
- Local police will accept the ID
- Benefits for cultural institutions could be used when spending time with one's children

### Homeless

- The ID is less expensive than a state-issued ID
- Local police will accept the ID
- Access to city services
- Access discounts at local businesses

### People with Disabilities

- ID is relatively inexpensive
- Caretakers can apply for the card
- Emergency contact information on back of the card
- Card can include an identifier on the back of the card that the cardholder has a disability

### Immigrants

- ID is relatively inexpensive
- Access to city services
- Access discounts to local businesses
- Minimizes the number of cards one has to carry
- Access city services and amenities

### LGBTQIA

- Gender can be self-selected
- Preferred name on front of the card and birth name on back of the card
- ID is relatively inexpensive
- Access to cultural institutions
- Access discounts to local businesses

### Seniors

- ID is relatively inexpensive
- Minimizes the number of cards one has to carry
- Access to cultural institutions
- Access discounts to city services
- Emergency contact on the back of the card

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## Veterans

- ID is relatively inexpensive
- Valid form of identification when applying for a job
- Indicate veteran status on card
- Access city services
- Access discounts at local businesses

## Youth

- ID can be used to gain access to school
- Emergency contact on the back of the card
- Access to cultural institutions
- Access discounts at local businesses
- Access libraries, parks, and recreation centers

**4.3 - Develop a marketing and communications strategy and timeline.** Existing research suggests that it takes about a year to develop a strong communications plan (Cities for Action, 2015). The timeline should include initial two phases and an ongoing effort.

- **Phase One (Months 1-6)** - During this time, outreach specialists should diligently work with the local community to establish relationships with organizations and businesses that can assist with the implementation of the program and/or provide discounts to cardholders.
- **Phase Two (Months 7-12)** - During this time, city leaders should work to pass legislation and city ordinances that will legitimize the validity of the ID card.
- **Ongoing** - The program should be consistently marketed throughout the duration of the program. Updates to the card, newly-created partnerships, discounts, and benefits should be regularly communicated to the public. This can easily be accomplished through social media, press releases, and/or electronic newsletters. An app can also be used to disseminate information and updates about the card.

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## Section 5 – Key Action: Implementing Program Effectively

This section examines what other communities have done when launching and administering a local ID program with a goal of: 1) identifying pitfalls to avoid and 2) best practices to emulate. As with any program, the city has three main options for administering the program:

1. **Internal Administration:** A local ID program administered by the city allows for close control and better oversight of the program’s operations. It also provides the opportunity for a seamless integration of the ID into other services provided by the city. Additionally, most cities already have the infrastructure in place and the ability to process applications, verify documents, and issue cards. In fact, many communities operate their local ID programs out of existing city offices.

For example, Columbus already has staff who process applications and review identification documents to issue leisure cards for its recreational facilities. The Department of Neighborhoods could also be a logical place to oversee the administration of a city ID program.

Of the programs researched, internal administration is the most common approach:

- **Chicago:** Administered by the Office of the City Clerk, which also issues business licenses and parking permits
  - **New Haven:** Managed by the Vital Statistics Division, which issues birth and death certificates, marriage licenses, etc.
  - **New York:** Administered by IDNYC, a new department that reports to the Mayor’s Office of Immigrant Affairs and is housed under the Human Resources Administration
  - **San Francisco:** Run by the County Clerk, which issues birth and death certificates, marriage licenses, etc.
2. **Shared Administration:** Almost all communities collaborate with community organizations in the development and implementation of a program, particularly in terms of outreach and communication with relevant groups. Washtenaw County splits the administration of its program with a nonprofit organization, such that it can be classified as shared administration (or co-production) with a non-profit organization.

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The administration of the Washtenaw County ID program is divided between the Washtenaw County Clerk & Register of Deeds Office and a coalition of community organizations, known as the Washtenaw ID Project, which is practically managed by the non-profit organization Synod Community Services (SCS). The Washtenaw Clerk's Office processes applications and issues the ID cards, while SCS leads outreach efforts, particularly with vulnerable populations.

For example, SCS staff regularly visit the county jail to assist incarcerated individuals with completing the ID application and taking their pictures. SCS efforts have also led to innovations in the ID program, such as a pilot project to have bedridden individuals apply via Skype (L. Sanchez, personal communication, November 20, 2018; E. Schultz, personal communication, November 20, 2018).

In the best case, shared administration results in an optimal sharing of program duties and the costs of operating the program. This is the case in Washtenaw County, where Synod community services has taken over the outreach tasks that align with its mission, while the county manages the administration of the card issuance process through an existing agency that already does similar work. The potential downside to a shared administration could be less control over the program, and that the community partner will not effectively execute its responsibilities.

3. **Outsource Administration: For-Profit Administration:** Several communities have contracted out the administration of their programs to for-profit business. For example, except for some partnership management duties handled by city staff, SF Global LLC administers the Detroit ID program, including application processing, card issuance, and outreach activities. SF Global also administers programs in Oakland and Richmond, CA.

Outsourcing program administration allows a city to acquire expertise and technology for running a local ID program that may be challenging for a city to develop or hire in-house, particularly over a short period of time, while allowing the city to develop the knowledge and expertise to eventually take over the program if it chooses. Contracting out the administration can also introduce some cost certainty into the launch of the program and make it easier to terminate the program after a trial period.

However, contracting out means having less direct control over the program and needing to manage the contract to ensure performance. In addition, given that there is only one company with experience in this area, there is likely to be little or no competition for an RFP.

*Non-Profit Administration:* In South Bend, the nonprofit organization La Casa de Amistad entirely funds and administers an ID program, which is recognized by the City of South Bend, but is not officially affiliated with the city. The City of South Bend requires all city offices to accept the ID.

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While this is an approach that Columbus might be able to pursue, it is not discussed in this report since the city cannot require a nonprofit to run a program and there are no obvious candidates to run a local program.

One ID Columbus has expressed a willingness to help with communication and outreach in support of a program, but not to administer the program itself (One ID Columbus, personal communication, November 13, 2018).

In short, how the city chooses to administer the program will affect how much control it has over the quality and security of program operations, and the costs the city incurs to offer a city ID program.

*What will it cost to run a local ID program?*

The main factors affecting program costs are staffing and technology choices. “Technology development is the most complicated aspect of the program structure to determine and implement. The systems chosen will dictate how intake, case management, printing, card production, and additional logistics occurs. This requires strong technologists and programmers to ensure successful implementation. The selection of the intake or case management vendor will be primarily informed by the desired sophistication of anti-fraud measures, card functionality, and cost. Technology options include:

- Case management/intake system
- Verification and card security functionality
- Appointment system
- Storage and data security (cloud or local server) - This will also be informed by confidentiality and security provisions, data storage and other measures the locality implements
- Hardware (computers, cameras and scanners)
- Printing (on-site or off-site) integration with other technologies
- Card Security - Consulting with law enforcement, state and other identification issuing entities on card security features that they use.” (Cities for Action, 2015, p. 11)

Table 5.1 below presents estimates of the costs to launch and operate the local ID programs researched.

Table 5.1

*Approximate Program Financial Costs*

<b>Community</b>	<b>First Year Costs</b>	<b>Ongoing Operation Costs</b>	<b>Net Start-Up and Operational Cost Per Card Issued in the First Year</b>	<b>Current Annual Operating Costs Per Cardholder</b>	<b>Current FTE Staffing Levels</b>
<b>Chicago</b>	\$1,120,000	\$790,000	NA	NA	2.5
<b>Detroit</b>	\$303,000	\$240,000	\$226	\$48	5
<b>New Haven</b>	\$200,672	\$100,336	\$64	\$10	1
<b>New York</b>	\$8,400,000	\$18,800,000	\$37	\$14	240
<b>San Francisco</b>	\$1,00,000	\$350,000	\$215	\$13	2
<b>South Bend</b>	\$12,000	\$13,320	\$25	\$10	1
<b>Washtenaw</b>	\$60,000	\$50,000	\$110	\$24	1

Sources: Data provided directly by communities and Fleck & Moody (2104)

As Table 5.1 indicates, the first year and ongoing operational costs vary widely. The first year average cost was \$1.6 million for a local ID program. However, if the highest and lowest cost programs are eliminated, the average first year cost was \$537,000. The average ongoing operational cost for a program was \$2.9 million. However, eliminating the lowest and highest cost programs results in an average operational cost of \$306,000. The divergence in these costs is not surprising given that communities differ significantly in the purpose of the program, the type of technology they use, and the number of locations and associated staff they choose to have run the program.

These figures are in line with a detailed analysis done for the City of Pittsburgh, which found that the first year costs for a city administered ID program would be about \$962,000. Including in the recommended marketing strategies increases the first year cost to \$1.1 million. This includes one-time costs of \$470,000 for hardware, software, card design, office furniture, etc. The ongoing operation costs were estimated to be \$491,000 in the second year and then about \$440,000 thereafter. The analysis assumes that Pittsburgh is going to have five separate enrollment locations. For every reduction in an enrollment location, these fixed costs are reduced by more than \$74,000 and the ongoing costs by at least \$30,000 because of a reduction in contract employees needed to staff a station (Pittsburgh, 2016).

For example, applying Pittsburgh’s cost estimates, if Columbus decided to have two enrollment stations - one central enrollment location and one mobile location - these one-time costs could be about \$150,000 and the operational costs could be about \$461,000, for a total first year cost of \$611,000 and ongoing operational costs of about \$410,000. Pittsburgh’s cost estimate also assumes a relatively high

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level of investment in technology, which is an approach taken by large cities like San Francisco, Chicago, and New York, but not Detroit. If Columbus chose to invest less in technology, this would reduce the start-up costs.

The Pittsburgh estimates also assume hiring three full-time city employees and five contracted employees to work at each enrollment center. This seems to be a relatively high number compared to other programs, but it makes sense because it assumes that Pittsburgh is going to start a new department to run the program. The programs with the highest staffing levels are Detroit and New York, which essentially started new departments to run their programs.

The other communities researched have chosen to run the local ID program out of an existing department with minimal or no increase in staffing for those operations.<sup>8</sup> This approach makes sense for most communities because the workload for a local ID program drops considerably after the first six months or so of the program. After the initial launch year, an existing department can often handle the administration of a program, particularly the review of applications and issuing of cards.

In short, as Table 5.1 illustrates, the costs of starting and operating a local ID program vary greatly and are driven by decisions made by the local community regarding the purpose of the program, the level of marketing and outreach the city wants to undertake, and decisions related to the security and integrity of the program. All of these factors affect technology decisions, which drive the start-up costs, staffing needs, and the ongoing operational costs. The [Cities for Action \(2015\) toolkit](#) provides a helpful program cost estimate worksheet, which Pittsburgh (2016) used to estimate costs for launching its own program.

### *Program Launch*

It is important to plan and execute an effective program launch – See Section 4 *for discussion regarding marketing the program prior to launch*. Without exception, communities reported that the initial demand exceeded their expectations. Communities invariably report a surge in demand for the cards at the very beginning of their programs for at least a few months and up to one year. Here are some examples of the challenges communities have faced at the launch:

- **New Haven:** In its first two months, New Haven issued 3,200 Elm City IDs (City of New Haven, n.d.). Due to the “very high demand... the city tripled its staffing and extended its hours of operation. This initial surge leveled off after a few months” (Cities for Action, 2015, p. 6).

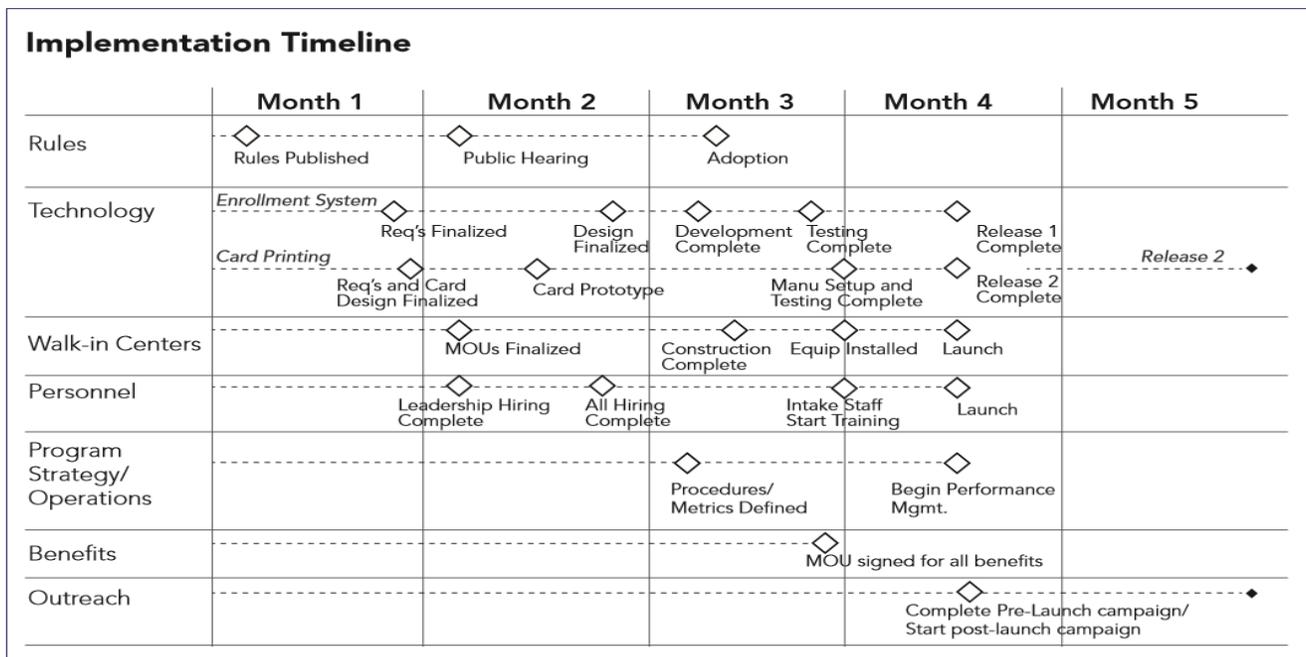
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<sup>8</sup> Determining precise staffing levels is a challenge. For example, Chicago created two new positions to run the CityKey program: Director and Deputy Director, with the Director managing communications and outreach, and the Deputy Director running the internal operations. In addition, 15% of time of other existing staff is spent reviewing applications and printing cards (K. LeFurgy, personal communication, August 23, 2018). In New Haven, three clerks spend about ten percent of their time on the operation of the Elm City ID (L. Wilson, personal communication, August 22, 2018).

- **New York:** “Upon launch in 2015, there was very high demand and the program moved to rapidly expand capacity for the first year” (Cities for Action, 2015, p. 6). In fact, in the first ten months of the IDNYC, 630,000 residents applied, which is about 7.5 percent of total residents. “In response to the initial demand, the initial staff size nearly quadrupled from the launch, the number of enrollment centers quadrupled, and program hours were extended to 15 hours a day in some locations. In addition to permanent hubs, the City opened pop-up centers, designed to be short-term (usually 2- to 4-week) locations for enrollment in diverse locations of the City” (Daley, Lunn, Hamilton, Bergman, & Tapper, 2016, p. 6).
- **San Francisco:** “On the first day the [San Francisco ID] card was available, lines to get a card went out the door and people had to wait for hours to obtain one” (Knight, 2009).
- **South Bend:** La Casa De Amistad (LCA) reports that in South Bend, 50 people showed up the first day. The initial demand was so overwhelming that LCA stopped issuing cards for 45 days to take time to retool. After the retooling, LCA issued about 500 South Bend ID cards the first couple of months and then it dropped to about 100 per month for a few months. Now, they issue about 50 SBIDs per month (S. Centellas, personal communication, August 29, 2018).

Communities agreed that at least six to nine months is required to prepare for any program launch, and planning for up to one year prior to the launch is preferred. The Cities for Action (2015) toolkit provides a helpful example implementation timeline – see Figure 5.1.

Figure 5.1  
Example Local ID Implementation Timeline



Source: Cities for Action, 2015, p. 8

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## Best Practices

This section details best practices for launching and administering a local ID program that should be considered if the City of Columbus chooses to create a city ID program.

**5.1 – Staff up and engage partners for the program launch.** Prepare for the launch by having a plan to provide additional staffing to support the surge in demand by engaging community organizations to provide volunteers to help review applications for completeness and verify that applicants have the necessary documents before going to trained reviewers. Communities can also supplement staffing with personnel from other city agencies, or by hiring temporary workers.

Prior to the public launch, host a soft launch to allow public employees the ability to access enrollment centers to familiarize themselves with application software and identify any issues/concerns that need to be addressed prior to the public launch. As with the rollout of any program, there will be initial operational glitches to remedy. Therefore, IT representatives and technology consultants should be available for the first several months of implementation to correct any technology issues that arise. (Cities for Action, 2015).

Many programs also allow individuals to make online appointments to help manage the flow of the workload, particularly after launch. However, appointments should not be required.

**5.2 - Ensure proper staff training.** “The hiring and training of staff is essential to delivering a high integrity program with good customer service, and one that is trusted by the constituencies or communities you aim to serve. Staff roles may include, but are not limited to, enrollment personnel, enrollment assistants to help provide customer service support, enrollment site supervisors, program integrity staff to provide secondary reviews of applications, and other roles such as policy positions, customer service roles, an IT team and more, depending on the scale of the program. [It is critical to] allow sufficient time to ensure that all front line staff are trained and ready to accept all documents and are proficient in using the system when the program launches.” (Cities for Action, 2015, p. 12; Center for Popular Democracy, 2015, p. 5-6).

“IDNYC Best Practices on Training:

- Fraudulent document recognition
- Intensive rules and eligibility training
- Extensive technology training on hardware and software
- Code of conduct and program manual orientation
- Cultural competency & customer service training - Race & ethnicity - Class - Gender - Cultural sensitivity - Language access - Senior citizens - LGBTQ awareness
- Privacy, confidentiality and security
- Legal framework around language access”

(Cities for Action, 2015, p. 12; Center for Popular Democracy, 2015, p. 5-6).

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**5.3 - Set the card issuance fee as low as possible, preferably less than \$20.** No program researched covers the total costs of operating its card program with fee revenues, though the fee often covers the cost of producing the card. Set fees primarily by assessing what people are willing to pay, rather than with a goal of generating significant revenue.

The cost of a local ID card ranges between \$0 and \$25. Of the programs researched, the average cost of an ID for adult is \$16 while the average cost for youth and seniors is \$9. Besides New York City, which does not charge for the IDNYC, Chicago and New Haven charge the lowest fee at \$10 for an adult ID. Detroit, South Bend, and Washtenaw have the highest fees at \$25 for an adult card.

Almost all communities have programs or funds to cover the cost of cards for individuals who cannot afford the fee. Not surprisingly, the cities agreed that the lower the fee the better, particularly if one is trying to help vulnerable populations that are often low income.

For Columbus, one way of assessing what is a low cost is to compare it to the cost of a State of Ohio ID Card. The State of Ohio charges a fee of \$8.50 to obtain a state identification card (<https://www.bmv.ohio.gov/links/bmv-all-fees.pdf>). Encouraging residents to obtain a State of Ohio ID card could be an alternative to a city ID in Columbus, although the state ID is not an option for undocumented immigrants. In addition, the Ohio Bureau of Motor Vehicles does not conduct the type of outreach to vulnerable populations that many city ID programs perform to get maximize the number vulnerable individuals that obtain IDs.

Another factor to consider in setting the card fee is the cost of producing the card, which can range between \$1.25 and \$7 per card, depending upon the features included. For example, adding an embedded computer chip makes the card more expensive to produce (J. Suriano, personal communication, November 19, 2018).

**5.4 - Set a card expiration length of two to five years.** Of 15 local ID programs, ten programs are valid for two years for adult cardholders. The Chicago and New York ID cards are valid for the longest period at five years. The New Haven and Washtenaw cards are valid for three years. Key factors to take into account in establishing the length of the card validity include the following:

- **Change in appearance of applicant:** IDs for youth may need to be valid for a shorter period. In some communities, IDs for senior citizens do not expire
- **The shelf life of a card** - Cards tend to start to show wear and tear after two to three years (J. Suriano, personal communication, November 19, 2018)
- **Manage workload:** The longer a card is valid, the less staffing required because there will be fewer card renewals each year. This is one reason why Chicago made its card valid for five years (K. LeFurgy, personal communication, August 23, 2018).

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