

Memorandum



Date: April 2, 2019

Agenda Item No. 2(B)2
May 7, 2019

To: Honorable Chairwoman Audrey M. Edmonson
and Members, Board of County Commissioners

From: Carlos A. Gimenez
Mayor

A handwritten signature in black ink, appearing to read "Carlos A. Gimenez", written over the name in the "From:" field.

Subject: Report regarding the feasibility and benefits of issuing Miami-Dade County identification cards to County residents and develop a plan for implementation of a County Identification Card program - Directive 160405

The following report is provided pursuant to Resolution No. R-738-15, adopted by the Board of County Commissioners (Board) on September 1, 2015, which directed the County Mayor or his designee to examine and prepare a report regarding the feasibility and benefits of issuing Miami-Dade County identification cards to County residents and develop a plan for implementation of a County Identification Card program. This report defines what constitutes a municipal identification card, the vulnerable populations it helps (Immigrants, homeless, seniors, returning residents, youth, victims of domestic violence and transgender) and the challenges, pitfalls and best practices of implementation.

Introduction

Municipal Identification (ID) Cards are identification cards issued by local government (city, county or town). As the need for identification continues to grow, many vulnerable populations remain isolated due to the lack of an official credential. Identification cards are required to lease an apartment, enter government buildings, register a child for school, open a bank account, get married, pick up a prescription and obtain employment.

Since the implementation of the first municipal ID card program in New Haven, Connecticut, in 2007, a growing number of municipalities have implemented such programs. New York City, Washington D.C, Newark, Chicago, San Francisco, Oakland and Los Angeles have implemented municipal ID card programs,ⁱ providing residents with proof of identity and residency. While no two programs are identical, all municipal ID card programs were created to address one or more community needs which range from providing all youth, including foster care youth, with access to various recreational and educational services, to offering homeless residents a needed credential. Municipal ID card programs are also used as a strategy to promote community inclusion, provide access to financial institutions and services, and improve relationships between residents and local government.ⁱⁱ Based on the research of various municipal ID card programs across the Country, the implementation of a local ID card program in Miami-Dade County is estimated to cost \$2.5M.

Below are snapshots of the San Francisco, Providence, New Haven, Newark, New York City, Detroit, Chicago and Aventura municipal ID card programs:

San Francisco, CA (Population: 884,262 residents)ⁱⁱⁱ

The SF City ID Card was launched in 2009 with an initial funding of \$1 million of city tax levy.^{iv} The card is available to all residents 13 and older, cost ranges from \$6 to \$17, with fee reductions for those who identify as low-income (Supplemental Nutrition Assistance Program, public housing and/or public assistance) and is accepted at participating banks/credit unions to open an account. The SF City ID is integrated with the library system and offers access to discounts at participating local businesses. Applicants are required to make an appointment via the online appointment system or contact 311 for

assistance.^v The program is administered by the Office of the County Clerk and more than 23,000 cards were issued within the first six years of launching the program. Three thousand cards fewer per year than initially projected.^{vi}

Providence, RI (Population: 179,000)^{vii}

The City of Providence municipal ID card program, IDPVD, launched in June 2018. IDPVD is available to all residents, ages 14 and older, and expires after 3 years. Residents must apply through the Department of Vital Records Office and the cost ranges from \$5 to \$15. The card is integrated with the library system and cardholders are provided access to special services, benefits and discounts offered by partnering businesses, restaurants, shops, museums, and entertainment venues. IDPVD allows transgender residents to select the gender with which they identify. In October of 2018, Providence celebrated the issuance of 1,000 Municipal ID cards.^{viii}

New Haven, CT (Population: 131,014)^{ix}

The Elm City Resident Card program, the first municipal ID card program, was launched in June 2007. The initial funding of \$250,359 was a grant from a local community development bank. The program is administered by the Office of Vital Statistics. The card fee is \$5 for children and \$10 for adults. In its first year, the program issued 4,729 (3.6% of the population) ID cards and issued a total of 13,251 cards by 2015.^x

Newark, NJ (Population: 285,154)^{xi}

Newark launched the, NMID Card program in August 2015. The card is available to all residents who are 14 and older, and is valid for two years. Within the first two weeks of its launch, the city issued 1,494 cards and 9,640 within its first year.^{xii} ID Newark costs \$10 for seniors ages 58 and up and children ages 14-17, \$20 for those ages 18-57, and \$15 for an ID renewal or replacement. Cardholders receive discounts and deals to restaurants and grocery stores and free membership to the Newark Museums. Cardholders can also use their NMID card as a library card.^{xiii}

New York City, NY (Population: 8.7 million)^{xiv}

IDNY was launched in January 2015 and within 10 months enrolled more than 630,000 residents into the program. Originally funded at \$8 million, the program's budget was increased to more than \$13 million to meet demand by increasing the number of sites, extending operating hours and implementing temporary pop-up enrollment centers across the city.^{xv} The free card is currently accepted at 13 banks/credit unions, provides free one-year membership to several museums, zoos, concert halls and botanical gardens and offers discounts with participating businesses.^{xvi} By March 2017, more than 1,000,000 cards were issued.^{xvii} The program is administered by the City's Human Resource Administration/Department of Social Services. Applications are available in multiple languages via the online application portal and appointments are made via the online appointment system or by calling 311. NYC recently decreased the minimum age for eligibility to 10.^{xviii}

Detroit, MI (Population: 673,104)^{xix}

The Detroit ID program was launched in December 2016 and is available to all residents ages 14 and older and expires after 2 years. Residents can schedule an appointment at one of the enrollment centers. Once the application and verification process are completed, the card is mailed directly to the applicant or to the enrollment center for pick up. The cost of the Detroit ID is \$25 for residents ages 18 to 61, and \$10 for those 17 and younger and 62 and older. The \$15 discount is also available for the homeless, re-entry population within 90 days of release and applicants who live within the federal poverty guidelines. The Detroit ID can be used to access discounts at stores, restaurants, theaters and free or discounted

admission to cultural institutions. Cardholders can also use the card to access city buildings and services.^{xx} The program has issued more than 3,506 ID cards.^{xxi}

Chicago, IL (Population: 2.7 million)^{xxii}

The Chicago Municipal ID program, CityKey, was launched in April 2018 and can be obtained by completing an application and scheduling an appointment at one of the mobile printing sites. Chicago will issue the first 100,000 cards at no cost and will later implement a fee of \$5 for those 18 and under, \$10 for those ages 18-64, and will remain free for all Seniors 65 and older. Fee waivers are available for the homeless, domestic violence survivors, veterans, low-income residents and the re-entry population. The CityKey serves as a library and transit card and offers benefits with participating museums, restaurants, businesses, events and stores throughout Chicago. Cardholders also have access to the Chicago RX program, which provides discounts on prescriptions and is accepted at all major chains and independent pharmacies in the city. The initial budget to launch the CityKey was \$1 million and the program is administered by the City Clerk's Office.

Aventura, FL (Population: 38,202)^{xxiii}

Aventura offers an identification card that is available to all residents for the purpose of accessing parks and recreation facilities and services. The card is issued by their Parks and Recreation Office. The Aventura ID card is free to residents and provides free entry into the city's parks, such as Waterways, Founders Park, Splash Pad and the Waterways Dog Park. Residents can also use their ID to reserve tennis courts and access recreation programs. Proof of residency documents are limited and include: FL Driver License or Identification Card, Voter Registration Card, mortgage deed or lease and an electric, telephone or other utility bill.^{xxiv}

Several municipalities are also in the exploratory, design or implementation phase, including Austin, TX; Boston, MA; Philadelphia, PA; Dallas, TX; Palm Beach, FL; Poughkeepsie, NY; and Minneapolis, MN.

The Dynamics of Municipal Identification Card Programs

With more than ten years since the implementation of the first municipal ID card program and an increasing number of large and small municipalities offering local identification programs, there is a wealth of available information on the benefits, challenges, pitfalls and best practices for a municipality to consider when designing a program.

Benefits of a Municipal ID Card Program

- May serve as proof of identity and residency
- Helps create a sense of inclusion by uniting all residents under one ID card regardless of race, class, ethnicity, gender, age, or immigration status. In an independent evaluation, 77% of New Yorkers reported that the IDNYC Card increased their sense of belonging to the city. Additionally, more than half surveyed use the card as their primary ID, and a quarter reported that it was their only form of U.S. photo identification^{xxv}
- May facilitate eased access to government services and entry into municipal buildings
- May serve as a form of identification to open an account with participating banks
- Helps promote civic engagement with local government, including law enforcement
- May provide benefits for residents across many business sectors
- May connect youth to various recreational and educational services

The chart below highlights key components of 13 Municipal ID Card Programs^{xxvi}:

Municipality ¹	Fees	Benefits & Incentives Program	Integrated with Library/ Parks/ Transit Services ²	Accepted at Financial Institutions ³
Aventura, FL	Free to all Aventura residents	No	Yes	No
Bridgeport, CT	\$15	Yes	Yes	Yes
Chicago, IL*	\$0 - \$10 Minors \$5, Adults 18-64 \$10, Seniors 65 & up FREE	Yes	Yes	Yes
Detroit, MI	\$25 A \$15 discount may be applied to those who qualify.	Yes	Yes	Yes
Mercer County, NJ	\$10 - \$20 \$20 Residents, \$15 Seniors 65 & up, Veterans \$10	No	Yes	Yes
Milwaukee, WI	\$10 \$5 replacement fee	No	No	Yes
New Haven, CT*	\$5 - \$10 Children \$5 & Adults \$10	No	Yes	Yes
New York City*	Free Replacement ID \$10	Yes	Yes	Yes
Newark, NJ*	\$10 - \$20 *New Card \$20, Renewal & Replacement \$15, Children & Seniors \$10	Yes	Yes	Yes
Oakland, CA*	\$10-\$15 Adults \$15, Seniors & Minors \$10	No	Yes	Yes
Providence, RI*	\$5-\$15 Minors, Seniors 65 & up and Low-Income applicants \$5	Yes	Yes	Yes
San Francisco, CA*	\$6 -\$17 Low-income, Seniors, Children \$6, Adults 14 and up \$17	Yes	Yes	Yes
Washington D.C.*	Free	No	Yes	No

¹ * Indicates a sanctuary city

² Integrated with one or more government services

³ One or more financial institutions accept the local card as an acceptable form of ID to open a bank account and access financial services.

Who could benefit from a Miami-Dade County Identification Card Program.

Miami-Dade is the most populous county in Florida with more than 2.8 million residents.^{xxvii} A County municipal identification program, designed with broad appeal to attract all residents, could have a significant social, civic and economic impact.

Vulnerable Populations

While it is a best practice to design a local ID that is available and appeals to all residents,^{xxviii} a local ID card program could also alleviate barriers for several vulnerable and disadvantaged populations, including immigrants, homeless, seniors and formerly incarcerated individuals.

Immigrants

Approximately 52.9% of Miami-Dade County residents are foreign-born,^{xxix} with an estimated 55,000 being unauthorized and undocumented.^{xxx} Across the United States, immigrants make critical contributions to the civic and economic vitality of communities.^{xxxi} Undocumented individuals live within limits and experience barriers to routine activities of daily living, which can range from retrieving a package from the post office to accessing health services.^{xxxii} There are approximately 450,000 undocumented immigrants in the Miami-Fort Lauderdale and West Palm Beach area^{xxxiii} who contribute more than \$437.4 million dollars in taxes.^{xxxiv} Because many immigrants work in a cash economy and are unable to open bank accounts without government issued identification, they become vulnerable to theft.^{xxxv} Due to their status, undocumented immigrants underreport crime as both victims and witnesses.^{xxxvi} Undocumented immigrants are also reluctant to report workplace abuse due to fear of being asked for identification.^{xxxvii}

Homeless

According to the Miami-Dade County Homeless Trust, there are currently more than 3,500 homeless individuals and families in the county.^{xxxviii} Many homeless individuals do not have identification, or have identification that local police and local businesses do not accept.^{xxxix} To access various social services, proof of identity and residency are required. A local ID program, which allows homeless individuals to use the address of the homeless shelter in which they have demonstrated temporary residency may alleviate barriers to accessing mental health services, food, employment services assistance and other essential support services.

Seniors

The Florida Department of Elder Affairs identified Miami-Dade County as having one of the largest concentrations of low-income minority older adults.^{xl} Of the 607,338 elder residents of Miami-Dade County, identified as 60 and older,^{xli} 172,170 elders were identified as living alone and below the 125 percentile poverty guidelines.^{xlii} Seniors often rely on their Medicare or social security card as a form of identification.^{xliii} These cards are limited as they lack a photographic image and address, which create a barrier, especially for low-income seniors, who may be in need and who are otherwise eligible for various local government services.

Returning Residents

The Florida Department of Corrections reports that some of the challenges inmates face in obtaining an identification card include the inability to consistently secure accurate information from an inmate to obtain certified copies of documents or a social security card. Additionally, the current time-frame restrictions from both the Florida Department of Health, Bureau of Vital Statistics (180 days prior to expiration of sentence) and the Social Security Administration (120 days prior to expiration of sentence) that must be adhered to in order to secure these documents make obtaining an ID a challenge.^{xliv} A certified birth certificate and social security card are two essential documents used to establish identity

and required to obtain a Florida ID. A lack of identification is one of the obstacles faced by returning residents to secure housing and employment, and access to various services.

Youth

Youth, especially youth in unstable living situations, experience difficulty obtaining IDs due to cost or their inability to produce the necessary documents.^{xlv} A local program, designed to include youth, can serve as a bridge to various services and programs.

Victims of Domestic Violence

Miami-Dade County reported 9,137 cases of domestic violence in 2017, the most of any county in Florida, according to the latest statistics available from the Florida Department of Law Enforcement.^{xlvi} Fleeing victims of domestic violence are sometimes forced to spontaneously seek safety, leaving essential documents behind. Additionally, many survivors of domestic violence continue to live in fear of their abuser, and confidentiality is paramount to their safety and the safety of their dependents. A local program that takes into the account the transitory (when in a shelter) and confidentiality needs of residents may be essential in aiding victims and survivors, and ensures the inclusion of this population.

Transgender

Transgender individuals face difficulties with obtaining a government-issued ID that reflects the gender with which they identify.^{xlvii} An identification card that allows applicants to select the gender in which they identify, similar to the program in Providence and other municipalities, ensures inclusion.

Local Businesses and Financial Institutions

Some US cities/counties, including Detroit, New York City, Newark, San Francisco and Chicago, have used their Municipal ID programs to develop partnerships with local businesses and cultural institutions to offer discounts and incentives to residents. Benefits range from free admission to museums to discounts on prescription drugs and at local restaurants, cafes and grocery stores. Partnering with businesses is a deliberate strategy to creating a card with broad appeal that attracts all residents, including those who may already have a more traditional form of a state or government-issued identification. A benefit of creating a program with broad appeal to all residents versus a definitive group(s), is that the card would not stigmatize the cardholder.^{xlviii}

The municipalities acknowledge local business participation and acceptance of the card in many ways. San Francisco recognizes participating businesses by listing them on their website, including them in marketing materials, providing a window sign that informs customers of their participation and distributing a partnership list to all new cardholders. This helps businesses gain visibility and increase their customer base.^{xlix}

To address challenges with the “unbanked” population, municipalities have developed partnerships with local credit unions and banks to accept the ID as an acceptable form of identification. This new access to banking provides opportunities for residents who were not able to meet minimal identification and documentation qualifications in the past to establish an account with a reputable financial institution as an alternative to check cashing outlets and predatory financial services. This is also a win for the financial institutions, as their acceptance of the local municipal identification card increases their potential customer base. Providing banking access to the unbanked population, specifically undocumented immigrants, also addresses a safety concern. Banking provides an alternative to walking with large sums of cash, an expectation of undocumented immigrants living in a cash economy, making them targets for theft. Five years after the implementation of a municipal ID program, the Police Chief of New Haven, CT,

reported an increase in the crimes reported and a 20% decrease in crime committed over the first two years of the program implementation.ⁱ

Unintended Consequences

A municipal ID card program can create inherent risk for two vulnerable populations, victims/survivors of domestic violence and undocumented immigrants. Every applicant who becomes a cardholder will be included in a record of registry that could be susceptible to requests from law enforcement agencies and through Freedom of Information Law (FOIL) requests. (See Challenges of Municipal Identification Card Programs section).

Challenges of Municipal Identification Card Programs

Lack of Support from Key Stakeholders

While more municipalities are implementing local identification programs, some have experienced challenges in moving from concept to reality. Buy-in from key stakeholders is essential, especially for municipalities, where a multi-system of government exists. Palm Beach County has secured funding and received an endorsement from the Criminal Justice Commission.ⁱⁱ However, the implementation of the program has been stalled due to concerns by the Palm Beach County Sheriff regarding eligibility screening and data retention.ⁱⁱⁱ Law enforcement acceptance of the card and participating in the development process are essential in serving the undocumented and under-documented community.ⁱⁱⁱⁱ In addition to law enforcement, other stakeholders may include schools, hospitals/clinics, financial institutions, businesses and residents.

Cost

While most municipalities charge a fee for the card, a commitment of tax-levy dollars is required to cover full program operation expenses, including expansion to meet demand. While not the most expensive component of a municipal identification card program, document authentication, fraud prevention, tamper-proof credentials and other factors to uphold integrity of a local ID program are costly and not optional, especially, if the goal of a local card is to be used and accepted widely across multiple sectors, including law enforcement. Many municipalities also have competing community needs that range from homelessness to elderly residents being waitlisted for services.

Data Privacy and Confidentiality

By creating a local municipal ID program, a record of cardholders' identity is inevitable. Some municipalities have faced challenges regarding the privacy and identity of cardholders. This is critical for vulnerable populations, namely under-documented and undocumented residents. During the infancy of IDNYC, New York City retained copies by scanning the documents used to affirm identity and residency of all cardholders into a database. Prompted by a Freedom of Information Law (FOIL) request of all scanned documents used to affirm identity, that ended in a lawsuit filed by state elected officials, the City has taken steps through amended and/or new legislation regarding data retention and data use, to better protect the identity of their residents.^{lv} Local government must address the multi-layered concerns and challenges regarding privacy and document storage to ensure that the implementation of a local identification program does not unintentionally impact the very same vulnerable populations it intended to serve.

Pitfalls of Municipal ID Card Programs

Some of the pitfalls when designing/implementing a local identification card program include, but are not limited to: Lack of having a broad appeal to all residents, not anticipating and planning for a heightened demand post launch and lack of accessibility. A local ID card program that lacks broad appeal results in limited use/enrollment, card stigmatization, decrease revenue and a card that is only useful to some. The

IDNYC evaluation revealed that 45% of all survey respondents (77,000) indicated that getting free memberships to 40 cultural institution was “quite a bit” a reason for which they applied for the card.^{lv}

While forecasting demand for a program designed with broad appeal could be difficult, not planning for an elevated demand of the card could be detrimental. Both New Haven and New York City experienced a large demand at the onset of their programs and were able to quickly respond by hiring more staff, increasing the number of sites, extending operating hours and adding mobile units and pop-up enrollment centers. These strategies increased program costs, with NYC increasing their budget by \$5 million to meet the demand.^{lvi}

A program design that is not accessible will keep the local identification card out-of-reach for many vulnerable groups. Accessibility includes affordability; flexibility; an expansive and vetted list of documents to achieve eligibility; a simple application process and location(s) that take into account transportation barriers.

Municipal ID Card Programs Best Practices

According to the report, *Building Identity*, the most impactful programs are those that:

- work with community members and local advocates to develop and implement the program
- prohibit the retention of application documents
- adopt the ID as the official ID card of the municipality
- require municipal agencies and offices to accept the card (subject to local, state and federal laws).
- establish a broad and flexible list of documents to prove identity and residency
- include alternative methods of proving residency for homeless individuals and survivors of domestic violence
- include card features and benefits that will attract a wide-range of applicants
- conduct trainings with local police for card acceptance
- allow cardholders to designate a gender of their choice
- avoid attaching a pre-paid debit to the ID, instead develop partnerships with financial institutions^{lvii}

Information displayed on Municipal Identification Cards

How and what information is displayed on ID Cards vary for each municipality. In addition to the cardholder's photograph and signature, a combination of the following are also displayed on several municipalities' cards (the first five are included on almost all that were reviewed):

- Name
- Date of birth
- Card issuance and expiration dates
- Registration Number
- Address*
- Gender
- Eye color
- Hair color
- Weight
- Height

Municipalities also include special designation to recognize veterans, military, youth and seniors that may also link them to additional discounts with participating business partners. Other features include: emergency contact information, allergies and medical conditions, preferred language and an organ donor option. Several municipalities allow residents to select the gender with which they identify or not select a

gender at all, while others do not include gender on the application or the card. The life of the card for many municipalities range from two to five years and youth cards expire at the age of 18.

*Some municipalities provide an address opt-out option for domestic violence survivors and allow individuals residing in a shelter, to use an alternate address such as a PO Box, with the appropriate support documents and other criteria, to obtain a card.

Criteria and Acceptable Forms of Documents

Eligibility requirements are one of the most important aspects in determining how accessible the identification card program would be to vulnerable populations.^{lviii} A menu-method model tied to a point system for acceptable forms of documents, similar to the programs in NYC, Newark and most state Department of Motor Vehicles, provides residents with a greater chance to achieve eligibility rather than a restrictive list. While Newark has a 6-point criteria (4 points for identity and 2 points for residency), NYC residents must meet at least 4 points of documents, including at least 3 points proving identity and at least 1 point proving residency.^{lix} Other options include a tiered model, similar to the program in San Francisco, which requires residents to provide one of five documents, or two of eight documents, to prove identity.^{lx} Below are examples of, and not an exhaustive list of, acceptable forms of documents that could be included in the menu or tiered model of acceptable documents:

Acceptable forms of identification to affirm proof of identity and residency: Florida Highway Safety and Motor Vehicles Driver License, Learner License or Identification Card with current Miami-Dade County address.

Acceptable forms of documents to affirm proof of identity: US Passport, Voter Registration Card, foreign passport, foreign driver license, certified copy of US or foreign birth certificate, US ITN Card, MDC Golden Passport, US Tribal ID, US Uniformed Services ID, Medicaid/Medicare Card, educational institution identification card (middle school and higher); US Permanent Resident Card; prison discharge papers; Social Security Card or an identification card issued by a MDC homeless shelter.

Acceptable forms of documents to affirm proof of residency: financial or credit card account bill, statement or notice; employment pay stub; jury summons; letter from homeless or domestic violence shelter in MDC, letter for parent/guardian of student enrolled in Head Start/Early Head Start, VPK, Miami-Dade County Public Schools, charter or private school, and car or home owners insurance, cable, phone or utility bill.

Card Design and Security

Security and integrity of the card are vital to a successful municipal ID card program. The card should include, but not be limited to, the following security features and are features of many municipal ID Cards and DMV licenses: card stock inventory serialized by laser engraving, embedded watermark, foil seal, laser etching, tamper-proof signature pane, microtext, rainbow printing, holographic lamination, UV ink and changeable laser imaging. These features are essential to deter fraud by making the card less vulnerable to counterfeit, while ensuring that law enforcement can quickly determine the authenticity of the card. The card could also offer double-sided printing to include special designation (see Information Displayed on Municipal ID Cards section). Legislation regarding misuse of the card to deter fraud should be enacted.^{lxi}

Mitigating Privacy and Confidentiality Risk

To ensure inclusiveness and wide adoption of the program, residents may need to feel secure that their privacy will be protected and information collected will not be shared/used for purposes other than the intended use (to the extent permitted by local, state and federal law). By becoming a cardholder of a local municipal ID program, residents are added to a record of registry. Even if the record of registry is limited in data, it is a record that may be subject to Florida's public records laws and other requests. This record should be given the highest level of consideration regarding integrity, privacy and confidentiality within the extent of Florida's public records laws as the County cannot independently add a public records law exemption. A change in State law is required to add an exemption. Some municipalities, outside of Florida, have codified protections against disclosure of identity information and further clarified which information is designated as confidential under federal and state public records laws.^{lxii}

The following are considerations that align with best practices; however, as described below, some practices do not align with current Florida laws:

- Adopting legislation that protects the identity and privacy of all cardholders (within the extent of Florida's public record laws) with emphasis on undocumented residents and survivors of domestic violence. Some information regarding domestic violence survivors may be exempt from disclosure according to Florida Statutes, section 119.071(2)j1. A Miami-Dade County local ID card program would require that the victims of domestic violence request their information remain exempt in writing and produce verification that a crime occurred. The exemption would cease after five years.^{lxiii} Additionally, legislation should include language regarding software, data use, document storage and printing methodologies.
- Ensuring that other groups, whose personal information is protected, such as firefighters, public defenders and police officers, among others, along with their spouses and children, as applicable, remain protected. Their information would need to be marked as exempt/confidential and would not be produced or shared.
- Implementing data mining protocols to protect all stakeholders, including cardholders.
- Not including information on the application that would single-out an applicant's immigration status.
- Refraining from copying, scanning and retaining documents that are used to prove residency and identity. All original documents (unless stated otherwise) should be presented by the applicant, in person, at the designated enrollment center for verification and be immediately returned to the applicant. San Francisco, Providence, Mercer County and New Haven are examples of municipalities that operate a Municipal ID program without copying/retaining applicants' documents. This practice presents a challenge as some Florida courts have considered documents to be public records subject to disclosure even where the government agency never took physical possession of them. A state legislative change is advisable to add exemptions to public record laws.
- Not itemizing, on paper or electronically, what documents are submitted to achieve eligibility by an applicant.
- Establishing a defined purpose and period for retaining the completed application in paper and/or electronically. In Florida, public records must be retained and maintained in accordance with a published records retention schedule.
- The application should *only* include information that would be printed on the card.
- Using facial recognition technology to maintain integrity of the program to prevent fraud. This ensures that the same individual cannot receive multiple cards. This feature is currently used in Providence with limited data being retained about the applicant. Under current Florida law, photos of applicants as well as data created in the facial recognition process may be considered public records, with the exception of protected groups.

- Destroying data at the card producing site that is used to produce and deliver the card. While municipalities in other states may have this option, public records may only be destroyed in Florida in accordance with published records retention schedule.
- Limiting printing to one site in a secured location.

These considerations and practices, as implemented in other states, not only protect the identification and privacy of cardholders, but also protect against other law enforcement use of retained information that might make them more vulnerable. Many of these practices, however, would be unavailable to the County without a State legislative change. Additionally, while municipalities like Providence mail the cards to the applicants, others including Newark, NJ, require that the applicant retrieve the card in person as a component of their privacy procedures, requiring two trips to the enrollment center as IDs are only printed at a singular location.

Integration

Many municipalities have transformed their municipal ID cards to the key to access local government services, including libraries, parks, youth programs and/or transportation. In Oakland, CA, the municipal ID card also serves as a debit card. While not required to launch a program, integration of local services under one card, could appeal to a broad base of users.

Fees

Affordability is an important factor in making the card accessible to all residents. A few municipalities provide the card to their residents at no cost; however, most municipalities charge a nominal fee that ranges from \$5 to \$25. Many offer discounted rates and/or full and partial fee waivers for individuals who can demonstrate financial hardship (proof of SNAP, public housing or public assistance). A state ID card currently costs \$25.

Costs of Implementing a Municipal ID Card Program

The cost for implementing a municipal ID card program will vary based on several key factors, including, but not limited to, data management, number of enrollment sites and the method of program administration. Municipalities have implemented their ID programs by administering it internally, partnering with non-profit organizations to administer, or procuring a third-party vendor to manage and administer the program. Additionally, technology varies from municipality to municipality, as some built and manage the system internally, purchased off-the-shelf software that has some ability to be augmented or procured a technology vendor to design, maintain, manage and store data. Lastly, card printing options varied across the municipalities, ranging from purchasing high-end printers to print the identification cards in-house to off-site printing, in which cards are mailed to the cardholder or the enrollment center for pick-up, eliminating the cost of equipment, maintenance and supplies. Below are examples of the estimated cost to implement a municipal ID card program in Miami-Dade County that aligns with best practices:

Estimated Costs:

1. To administer a program internally using a procured vendor to develop the software, store/manage data and print the cards offsite for a three year program inclusive of registering 200,000 applicants, is estimated to cost a total of \$2.5 million at five locations. Vendor costs would be \$661,900 (\$220,333/annually).^{lxiv} This includes equipment to capture photo, software licenses at five (enrollment centers across the County, training on equipment and software use, biometric facial recognition, and the production of credentials that meet the specifications highlighted in the Card Design and Security section. If the program is widely adopted by residents and more than 200,000 cards are required to serve the demand, additional cards will cost \$3.37, within the

contracted period. Costs associated with implementation that include finance, outreach and marketing, integrity staff, enrollment staff, translation, space (if applicable), document authentication training, and postage and mail presort of each card (estimated at \$0.48 per card if mailed directly to the residents home or shelter) should also be included. Other delivery options, including bulk delivery to the enrollment center for pick-up can be more cost-effective. Demand may also drive the need for an online appointment system. The above quote can be scaled to serve more or fewer applicants during the contract period. An estimated total start-up cost to operate at five locations is \$2.5 million, with personnel being the largest expense at approximately \$870,077 for 10 direct service staff and one program administrator (includes fringe). The cost to implement this model at one location is approximately \$1.3 million.

2. To acquire software and manage data internally through Miami-Dade County's Information Technology Department (ITD) will cost approximately \$206,548 for the first year at one site, inclusive of enrolling 10,000 applicants. This estimate includes the card printer, camera, signature pad, tooling for hologram, software, on-site set-up, cards and technology that meet the specifications highlighted in the Card Design and Security section, technology support staff and supplies. Similar to the example above, this estimate does not include other costs associated with implementation and it can only be scaled in the area of card production and expansion to additional sites. An estimated total start-up cost to operate at one location is \$1.3 million inclusive of 190,000 additional cards and the supplies needed for printing.

Department to Administer the Program

The departments/offices that administer municipal ID card programs across the country varies. San Francisco, Chicago and Mercer County in New Jersey ID card programs are administered by their City/County Clerk; the Human Resources Administration Department of Social Services administers the IDNYC program in New York City, and the Office of Vital Statistics administers the program in Bridgeport and New Haven, Connecticut. The main functions of these departments require that they affirm identity and/or residency; therefore, a natural placement for a municipal ID program. There are four Miami-Dade County departments that currently issue a form of identification card: Miami-Dade Public Library System, Human Resources, Public Works and Transportation (Golden Passport for seniors and Patriot Pass for military and veterans) and a few departments/offices that verify residency for services, including Elections, Community Action and Human Services and Clerk of Courts. Further review is needed to determine which County department would administer a local municipal ID program.

Implementation Timeline

With secured funding, a minimum of 18 months is required to effectively design and implement a municipal ID card program. This timeframe will allow for, but not limited to:

- Engaging various stakeholders, including law enforcement and advocates of vulnerable populations
- Working with various law enforcement agencies to integrate the card as an acceptable form of identification (subject to applicable local, state and federal laws).
- Establishing and adopting legislation, guidelines, policies and procedures
- Vetting a comprehensive and diverse list of acceptable documents
- Establishing a robust document verification process and train staff to effectively authenticate documents.
- Identifying and procuring technology
- Building a benefits and incentives program
- Developing enrollment materials and translating in various languages
- Preparing the enrollment center(s) and staff

- Developing and launching a culturally-appropriate and diverse marketing strategy to inform residents about the program and educate them on how to effectively use it (website, brochures, social media and grassroots efforts)
- Developing a comprehensive education campaign to inform residents of appropriate and inappropriate card use.

Conclusion

The number of municipalities that are implementing local identification programs is growing. As the County continues to explore the impact of implementing its own program, below are areas that require a comprehensive review:

- The authentication of documents is vital to maintain integrity. Investing in a robust verification process and working closely with consulates and various law enforcement entities for program buy-in (subject to applicable laws) and staff training is critical to ensuring that identifications are issued to those who truly meet the eligibility requirement.
- The impact to the program will change with and without buy-in from the municipalities. Subject to applicable local, state and federal laws, buy-in could allow the card to be acceptable within the County boundaries regardless of individual cities and strengthen the outcomes of vulnerable populations reporting crime. An in-depth review of services, funding and governance is required.
- Legislation, policies and procedures that govern the application for and issuance of the Municipal ID card will impact the success of the program.
- Cost and the impact to other County services.

If you have any questions or concerns, please contact Lucia Davis-Raiford, Director, Community Action and Human Services Department, at 786-469-4644.

Per Ordinance No. 14-65, this report will be placed on the next available Board meeting agenda.

c: Abigail Price-Williams, County Attorney
Geri Bonzon-Keenan, First Assistant County Attorney
Maurice L. Kemp, Deputy Mayor, Office of the Mayor
Edward Marquez, Deputy Mayor, Office of the Mayor
Lucia Davis-Raiford, Director, Community Action and Human Services Department
Jennifer Moon, Director, Office of Management and Budget
Linda Cave, Acting Director, Clerk of the Board
Eugene Love, Agenda Coordinator, Office of the Agenda Coordination

Notes

-
- ⁱ Building Identity: A Toolkit for Designing and Implementing a Successful Municipal ID Program, Center for Popular Democracy, November 2013. Available at <https://populardemocracy.org/news/publications/building-identity-toolkit-designing-and-implementing-successful-municipal-id>
- ⁱⁱ Building Identity: A Toolkit for Designing and Implementing a Successful Municipal ID Program, Center for Popular Democracy, November 2013. Available at <https://populardemocracy.org/news/publications/building-identity-toolkit-designing-and-implementing-successful-municipal-id>
- ⁱⁱⁱ US Census as of July 2017. Available at <http://www.census.gov>
- ^{iv} Municipal ID Program Toolkit. Cities for Action. Available at https://www.citiesforaction.us/municipal_id_program_toolkit
- ^v SF City ID Card. Office of the County Clerk, City and County of San Francisco Available at <http://www.sfgov.org/countyclerk/>
- ^{vi} Municipal ID Program Toolkit. Cities for Action. Available at https://www.citiesforaction.us/municipal_id_program_toolkit
- ^{vii} World Population Review, Providence, RI Available at <https://www.worldpopulationreview.com/us-cities/providence-population/>
- ^{viii} Providence's Municipal ID Program, IDPVD, Issues 1,000th Card .Available at <https://www.providenceri.gov/providences-municipal-id-program-idpvd-issues-1000th-card/>
- ^{ix} US Census as of July 2017. Available at <http://www.census.gov>
- ^x Municipal ID Program Toolkit. Cities for Action. Available at https://www.citiesforaction.us/municipal_id_program_toolkit
- ^{xi} US Census as of July 2017. Available at <http://www.census.gov>
- ^{xii} 9,600 and counting: Newark expands municipal ID program by Steve Strunsky, NJ Advance Media for NJ.com. September 20, 2016 Available at https://www.nj.com/essex/index.ssf/2016/09/after_a_fast_start_newark_expands_municipal_id_pro.html
- ^{xiii} Newark Municipal ID Program. Available at <https://www.newarknj.gov/card/municipalid>
- ^{xiv} NYC Planning. Available at <https://www1.nyc.gov/site/planning/data-maps/nyc-population/current-future-populations.page>
- ^{xv} Municipal ID Program Toolkit. Cities for Action. Available at https://www.citiesforaction.us/municipal_id_program_toolkit
- ^{xvi} IDNYC. City of New York. Available at <https://www1.nyc.gov/site/idnyc/index.page>
- ^{xvii} Number of IDNYC cards surpasses 1 million by Shelia Anne Feeney. March 31, 2017 AMNewYork. Available at <https://www.amny.com/news/number-of-idnyc-cards-issued-surpasses-1-million-1.13341111>
- ^{xviii} IDNYC. City of New York. Available at <https://www1.nyc.gov/site/idnyc/index.page>
- ^{xix} US Census as of July 2017. Available at <http://www.census.gov>
- ^{xx} Detroit ID. Available at <https://www.detroitmi.gov/departments/detroit-health-department/programs-and-services/detroit-id>
- ^{xxi} Detroit's ID Program Still Trying to Establish Its Identity by Georgi-Ann Bargamian Available at <https://www.detroitjournalism.org/2018/02/16/detroits-id-program-still-trying-establish-identity/>
- ^{xxii} About the CityKey and "FAQs" Available at <https://www.cityclerk.com/chicagocitykey/about>
- ^{xxiii} US Census as of July 2017. Available at <http://www.census.gov>
- ^{xxiv} City of Aventura- Aventura ID Card Available at <https://www.cityofaventura.com/256/Aventura-ID-Card>
- ^{xxv} IDNYC: A Tool of Empowerment- A Mixed-Methods Evaluation of the New York Municipal ID Program. August 2016 Available at https://www1.nyc.gov/assets/idnyc/downloads/pdf/idnyc_report_full.pdf
- ^{xxvi} Information gathered from each municipality's website and/or phone calls.
- ^{xxvii} US Census as of July 2017. Available at <http://www.census.gov>
- ^{xxviii} Building Identity: A Toolkit for Designing and Implementing a Successful Municipal ID Program, Center for Popular Democracy, November 2013. Available at <https://populardemocracy.org/news/publications/building-identity-toolkit-designing-and-implementing-successful-municipal-id>
- ^{xxix} US Census as of July 2017. Available at <http://www.census.gov>
- ^{xxx} Pew Center Research. Available at <http://www.pewsearch.org/fact-tank/2017/02/09/us-metro-areas-unauthorized-immigrants/>

xxxix Pew Center Research. Available at <http://www.pewsearch.org/fact-tank/2017/02/09/us-metro-areas-unauthorized-immigrants/>

xxxix Building Identity: A Toolkit for Designing and Implementing a Successful Municipal ID Program, Center for Popular Democracy, November 2013. Available at <https://populardemocracy.org/news/publications/building-identity-toolkit-designing-and-implementing-successful-municipal-id>

xxxix 20 Metro Areas are Home to Six-in-Ten unauthorized Immigrants in U.S., by Jeffrey S. Passel and D'Vera Cohn. February 2017. Pew Center Research. Available at <http://www.pewsearch.org/fact-tank/2017/02/09/us-metro-areas-unauthorized-immigrants/>

xxxix Considering the Tax Contributions from Undocumented Immigrants in Florida, FIU Center for Labor Research and Studies, Feb 2017. Available at <http://www.risep.fiu.edu>

xxxix Municipal IDs: Local Governments and the Power to Create Identity Documents by Kendra Sena. Albany Law School Government Law Center. Available at www.albanylaw.edu/GLC/Immigration

xxxix Considering the Tax Contributions from Undocumented Immigrants in Florida, FIU Center for Labor Research and Studies, Feb 2017. Available at <http://www.risep.fiu.edu>

xxxix Who We Are: Municipal ID Cards as a Local Strategy to Promote Belonging and Shared Identity. December, 2013. The Center for Popular Democracy. Available at <https://populardemocracy.org/sites/default/files/municipal%20id%20report.pdf>

xxxix Miami-Dade County Homeless Trust reports homelessness in Miami-Dade is at a record low, February 12, 2018. Available at <http://homelesstrust.org/releases/2018-02-12homeless-census.asp>

xxxix Building Identity: A Toolkit for Designing and Implementing a Successful Municipal ID Program, Center for Popular Democracy, November 2013. Available at <https://populardemocracy.org/news/publications/building-identity-toolkit-designing-and-implementing-successful-municipal-id>

xl Demographic Profiles & Statistics. State of Florida Department of Elder Affairs. Available at <http://www.elderaffairs.state.fl.us>

xli US Census as of July 2017. Available at <http://www.census.gov>

xl Demographic Profiles & Statistics. State of Florida Department of Elder Affairs. Available at <http://www.elderaffairs.state.fl.us>

xl Building Identity: A Toolkit for Designing and Implementing a Successful Municipal ID Program, Center for Popular Democracy, November 2013. Available at <https://populardemocracy.org/news/publications/building-identity-toolkit-designing-and-implementing-successful-municipal-id>

xliv Florida Department of Corrections 2016-2017 Annual Report. Available at <http://www.dc.state.fl.us/pub/annual/1617/FDC-AR2106-17.pdf>

xlv Building Identity: A Toolkit for Designing and Implementing a Successful Municipal ID Program, Center for Popular Democracy, November 2013. Available at <https://populardemocracy.org/news/publications/building-identity-toolkit-designing-and-implementing-successful-municipal-id>

xlvi 2017 Offenses by the Year. Florida Department of Law Enforcement. Available at <http://www.fdle.state.fl.us/FSAC/Data-Statistics/UCR-Domestic-Violence.aspx>

xlvi Building Identity: A Toolkit for Designing and Implementing a Successful Municipal ID Program, Center for Popular Democracy, November 2013. Available at <https://populardemocracy.org/news/publications/building-identity-toolkit-designing-and-implementing-successful-municipal-id>

xlvi Who We Are: Municipal ID Cards as a Local Strategy to Promote Belonging and Shared Identity. December, 2013. The Center for Popular Democracy. Available at <https://populardemocracy.org/sites/default/files/municipal%20id%20report.pdf>

xliv Office of the County Clerk, City and County of San Francisco Available at <http://www.sfgov.org/countyclerk/>

¹ Municipal IDs: Local Governments and the Power to Create Identity Documents by Kendra Sena. August 30, 2018 Available at <https://governmentreform.wordpress.com/2018/08/30/municipal-ids-local-governments-and-the-power-to-create-identity-documents/>

ⁱⁱ The Criminal Justice Commission is an advisory group of community leaders, law enforcement, judicial and business representatives. Palm Beach County mulls issuing community IDs to undocumented residents by Skyler-Swisher. March 23, 2018 Available at <https://www.sun-sentinel.com/local/palm-beach/fl-reg-community-id-program-20180323>

ⁱⁱⁱ Palm Beach County mulls issuing community IDs to undocumented residents by Skyler-Swisher. March 23, 2018 Available at <https://www.sun-sentinel.com/local/palm-beach/fl-reg-community-id-program-20180323>

^{liii} Building Identity: A Toolkit for Designing and Implementing a Successful Municipal ID Program, Center for Popular Democracy, November 2013. Available at <https://populardemocracy.org/news/publications/building-identity-toolkit-designing-and-implementing-successful-municipal-id>

^{liv} In 2016, two NY state elected officials requested any scanned information regarding IDNYC under the Freedom of Information Law (FOIL). The city denied the request, citing various FOIL exemptions, which subsequently resulted in the elected officials suing the city to stop their plan to destroy the documents, stating that destroying the records would be threat to national security. Municipal IDs: Local Governments and the Power to Create Identity Documents by Kendra Sena. Albany Law School Government Law Center. Available at [www.albanylaw.EDU/GLC/Immigration](http://www.albanylaw.edu/GLC/Immigration)

^{lv} IDNYC A Tool of Empowerment- A Mixed-Methods Evaluation of the New York Municipal ID Program. August 2016 Available at https://www1.nyc.gov/assets/idnyc/downloads/pdf/idnyc_report_full.pdf

^{lvi} Municipal ID Program Toolkit. Cities for Action. Available at https://www.citiesforaction.us/municipal_id_program_toolkit

^{lvii} Building Identity: A Toolkit for Designing and Implementing a Successful Municipal ID Program, Center for Popular Democracy, November 2013. Available at <https://populardemocracy.org/news/publications/building-identity-toolkit-designing-and-implementing-successful-municipal-id>

^{lviii} Building Identity: A Toolkit for Designing and Implementing a Successful Municipal ID Program, Center for Popular Democracy, November 2013. Available at <https://populardemocracy.org/news/publications/building-identity-toolkit-designing-and-implementing-successful-municipal-id>

^{lix} IDNYC City of New York. Available at <http://www1.nyc.gov/site/idnyc/card/documentation.page>

^{lx} SF City ID Card. Office of the County Clerk, City and County of San Francisco. Available at <http://www.sfgov.org/countyclerk/>

^{lxi} Building Identity: A Toolkit for Designing and Implementing a Successful Municipal ID Program, Center for Popular Democracy, November 2013. Available at <https://populardemocracy.org/news/publications/building-identity-toolkit-designing-and-implementing-successful-municipal-id>

^{lxii} Municipal IDs: Local Governments and the Power to Create Identity Documents by Kendra Sena. Albany Law School

^{lxiii} Florida Statute www.flsenate.gov/laws/

^{lxiv} Quote provided by Valid USA, Inc., technology vendor that was awarded the RFP for the City of Providence Municipal ID Program