

## PHOTO IDENTIFICATION REQUIREMENT

---

### Purpose

The following assessment aims to gauge the current impact of the Photo Identification (ID) Requirement policy and whether it creates barriers or hardships for individuals applying for and receiving General Relief (GR) benefits. The following factors were considered when conducting the evaluation:

- Review of the policy's authority including the California Welfare and Institutions Code (WIC) and County Code.
- Analysis of GR benefit denials and discontinuances due to failure to provide photo ID; and
- Review of ID requirements of other California counties using data from General Relief/Assistance County Exchange (GRACE).

### Background

As a result of Senate Bill 89 (Chapter 24, Statutes of 2017), effective July 1, 2018, the State Fingerprint Imaging System (SFIS) requirement was eliminated for all cash programs. As a condition of receiving aid, SFIS was used to establish or verify an applicant's identity. Prior to the elimination of the SFIS, County Code required a photograph and fingerprint imaging at the time of the application.

As a result of the elimination of the SFIS requirement in July 2018, the Board of Supervisors updated the County Code in September 2019, to require the Department to establish or verify the identity of an individual via photo ID as a condition of receiving aid.

Due to the State of Emergency Proclamation caused by the COVID-19 Pandemic that began in January 2020, Los Angeles (L.A.) County waived the in-person element of the photo ID requirement. Upon the termination of the public health emergency, effective December 7, 2023, GR Program updated GR Policy to reflect that showing a photo ID in person, except under special circumstances was as a permanent policy. The photo ID requirement applies regardless of citizenship or legal status for living in the United States. This update was implemented in part due to an advocate's request.

### Program Authority Review

<b>Los Angeles County Code</b>	<b>2.102.050 (B)</b> To establish or verify the identity of an applicant or recipient, the Department will require that an applicant or recipient provide photo identification as a condition of receiving aid. If an applicant or recipient is unable to provide photo identification, the Department will make reasonable efforts to assist such applicant or recipient to obtain photo identification. An applicant, who is in the process of obtaining photo identification, may receive aid for up to 60 days.
--------------------------------	---

## Photo ID Requirement Overview

All GR applicants/participants must provide a photo ID at the time of the application or when a new person is added to the case. Applicants/participants without an acceptable photo ID are assisted by eligibility staff in obtaining a photo ID and are aided on an interim basis for 60 calendar days, pending receipt of a photo ID. Any photo ID on file that was previously provided by an applicant/participant and saved in CalSAWS Imaging Solutions can be used to verify an applicant's/participant's identity, including an expired California Driver's License. Failure to comply with the photo ID requirement will be cause for denial or discontinuance of the GR case.

Currently, applicants/participants are required to provide a photo ID in person for the following special circumstances:

1. The GR applicant/participant was identified as a victim of identity theft by the Welfare Fraud Prevention & Investigations (WFP&I) Section, and their case was previously denied/discontinued per WFP&I request; or
2. There is a reasonable suspicion that the provided photo ID is altered.

## Data Analysis

The tables below indicate the number of GR denials and discontinuances due to Failure to Provide (FTP) name/identity for the calendar years 2021-2023, which were the first three full calendar years that were available once the in-person element of the photo ID requirement was waived.

Year	Total Denials	Failure To Provide Name/Identity	Percentage of Total
2021	75,501	90	0.12 %
2022	107,562	379	0.35 %
2023	135,960	679	0.50 %
Total	319,023	1,143	0.36 %

Table 1 General Relief denials due to FTP Name/Identity. Data based on CalSAWS GR Abbreviated Applications Report.

Year	Total Discontinuances	Failure To Provide Name/Identity	Percentage of Total
2021	109,854	143	0.13 %
2022	134,989	160	0.12 %
2023	164,842	396	0.24 %
Total	409,685	699	0.17 %

Table 2 General Relief discontinuances due to FTP Name/Identity. Data based on CalSAWS GR Termination Suspension Demographics Report.

A review of GR caseload denials and discontinuances over the last three full calendar years, 2021 through 2023, indicates a minimal rate of denials and discontinuances (less than 1%) due to failure to provide verification of identity. During this period, only 1,143 applications (0.36%) of a total of 319,023 were denied for "Failure to Provide Name/Identity." During the same period, there were only 699 cases (0.17%) of a total of 409,685 that were discontinued for "FTP Name/Identity."

## GR/GA Photo ID Requirement in Other Counties

A review of GR/General Assistance (GA) photo ID requirements in other counties was completed. The information was obtained through a survey of 58 California counties via the GRACE committee on October 25, 2023. The survey was comprised of questions on how each county administered their GR/GA program. There was a total of 16 counties that responded to the

survey, of which 15 counties provided copies of their program policies. From those, only Amador, Contra Costa, Marin, and Monterey counties require the applicant/participant to provide a photo ID. The remaining counties only require one form of identification which include but are not limited to voter registration cards, documents containing the Social Security Number, wage stubs, birth certificates, driver's license/identification card, work or school ID, ID for health benefits or for another assistance program and collateral contact.

All responding counties have a similar or a more flexible ID requirement than L.A. County. This helps eliminate barriers and allows their customers a more streamlined path to receive the benefits they need.

## **Conclusion**

While the WIC currently does not identify any specific requirements pertaining to photo ID, the L.A. County Code requires all applicants/participants to provide photo ID as a condition of receiving aid.

A review of L.A. County's denial and discontinuance data for calendar years 2021 through 2023 shows that less than 0.5% percent of the GR cases have been impacted by the photo ID requirement. Based on the data, the current photo ID requirement does not create a substantial barrier that would displace GR customers or put them at a disadvantage. GR customers are able to apply for and receive their benefits timely.

Although other counties accept other verification documents in lieu of photo ID, such as school ID, wage stubs, or ID for health benefits, the same might not be feasible in L.A. County due to the higher GR caseload size in L.A. County. Adopting a more flexible ID requirement will likely result in an even lower denial and discontinuance rates but could potentially lead to an increase in fraud referrals.