

The IDNYC Photo ID Requirement Issue

The Problem

IDNYC requires a government-issued photo ID to get a photo ID.

For youth fleeing abuse, neglect, or trafficking, this is impossible. They often leave with no vital documents.

Result: Youth who are ready to exit shelter into supportive housing or HRA benefits are blocked because they cannot obtain the one ID they need.

Why This Matters for RHY

The Door's RHY Work	Where IDNYC Blocks
Youth fleeing unsafe situations	They flee without ID.
Youth in shelter (DHS/RHY programs)	DHS verifies their identity for shelter. But IDNYC won't accept DHS as a "caretaker."
Youth ready for housing placement	No IDNYC = no supportive housing application. No HRA benefits.
Immigrant youth with no prior US ID	They have zero state-issued photo ID. IDNYC is completely inaccessible.

The Fix (Two Options – Either Works)

Option 1 (Fastest): Expand the list of eligible "caretaker" agencies to include DHS and DHS-contracted shelter case managers. DHS already verifies identity for shelter intake. IDNYC should accept that verification.

Option 2 (Backup): Accept a physician's statement as proof of identity, following the Social Security Administration's model for replacement cards.

Contacts and Potential Partners

- Coalition for the Homeless (Warm Lead)
- Safe Horizons (Warm lead)

- Brown & Weinraub (lobbying advisor)

Contacted and waiting to hear back

- Legal Aid Society – Homeless Rights Project (Under Coalition for the Homeless)
- Councilwoman Encarnacion (Council on Housing and Immigration)
- Councilwoman Guiterez District 34

Questions for The Door:

1. How do you currently get IDs for your youth?
2. Who is your supportive housing overseeing agency - is it DHS?
3. What is the RHY Coalition's current goals?
4. Are there other potential problems you foresee that we should include? Place of birth

IDNYC Document Guidelines Breakdown

The Basic Rules

Requirement	Detail
Total points	4 points minimum
Proof of identity	At least 3 points
Proof of NYC residency	At least 1 point
Photo requirement	At least 1 document must have a photo, OR applicant must be accompanied by a caretaker
Date of birth	At least 1 document must show DOB

Age minimum	10 years old (ages 10-13 require caretaker)
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Expired documents	Not accepted (few exceptions)
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The Problem

Without a caretaker: You need a photo ID to get a photo ID.

Scenario	What Happens
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Adult (14+), no photo ID, no caretaker	Cannot apply.
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Adult fleeing abuse, left ID behind	Cannot apply.
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Adult whose ID was stolen	Cannot apply.
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Adult exiting DOC with no ID	Cannot apply.
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With a caretaker: You don't need a photo ID, but caretaker eligibility is extremely narrow.

Current Caretaker Eligibility	Problem
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Parent/guardian (with proof of relationship)

Many RHY youth are not with parents

Foster parent (with agency letter)

Requires formal foster care placement

ACS or foster care agency employee

Only for youth in ACS custody

Residential care facility employee (OPWDD, OMH, DOH)

For disabled adults only

Social Security Representative Payee (with letter)

Requires existing SSA relationship

DHS shelter case manager

NOT currently eligible

Solution: DHS Caretakers

DHS already verifies identity for shelter intake. But IDNYC won't accept that verification.

What DHS Does

What IDNYC Requires

Verifies identity to enter shelter

Won't accept DHS as a caretaker

Has photo and case file on every client

Won't accept DHS case manager attestation

Confirms residency in NYC shelter

Won't accept DHS letter as proof of relationship

Your fix: Add DHS and DHS-contracted shelter case managers to the caretaker list.

Where Physician Statements Could Help

Current rule: No option for a physician statement as proof of identity.

The SSA model: Social Security Administration accepts a physician's signed statement as proof of identity for replacement cards when no photo ID exists.

How it would work for IDNYC:

Document	Current Points	Proposed Change
Physician statement (signed, with medical record number)	0 points	2-3 points for identity
Combined with shelter letter (residency)	1 point	1 point
Combined with birth certificate (if available)	2 points	2 points
Total	Not enough	Enough (4-5 points)

What Your Clients Actually Have (And What They're Missing)

Document	Common?	Points	Has Photo?
Birth certificate	Sometimes (if fled with it)	2	No
Social Security card	Sometimes	2	No
Shelter letter (residency)	Yes (DHS provides)	1	No
Foreign passport	Rare for RHY	2-3	Yes (if they have it)
School ID	Sometimes	1	Usually
Photo ID	Rare for fleeing clients	Varies	Yes

A client with a birth certificate (2 pts) + Social Security card (2 pts) + shelter letter (1 pt) = 5 points. But they have no photo ID and no eligible caretaker. So they are blocked despite having enough points.

Two Fixes Mapped to the Rules

Fix	What It Changes	Which Clients It Helps
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Expand caretaker list to include DHS

DHS case manager can sign as caretaker, waiving photo requirement

All shelter clients without photo ID

Accept physician statements

Adds a new 2-3 point document option

Clients with medical access but no photo ID
