

# Memo: Proposed Changes to DC Limited Purpose Credential Law

September 20th, 2023<sup>1</sup>

Currently, many DC residents who are migrants, like recently arrived asylum-seekers and unaccompanied minors, are unable to obtain identification cards. While DC has Limited Purpose Credential Driver's Licenses and IDs (LPCs) available to residents who do not have or are ineligible for social security numbers (SSNs), many migrants are essentially unable to obtain them because of overly restrictive eligibility requirements and regulations limiting the documents an applicant can present to satisfy proof of identification and proof of DC residency. Additionally, District residents who have been issued SSNs but are unable to provide the documents required to obtain a REAL ID, also cannot obtain an LPC. As a result, many DC residents are excluded from applying for any form of driver's license or identification card despite there being no federal law that prohibits them from obtaining an LPC instead of a REAL ID.

## **Without ID, DC residents face many barriers to self-sufficiency, including the inability to:**

- Drive legally: Many migrants have to drive without a license to be able to work and support their families, this puts them in a precarious position and negatively impacts public safety.
- Open bank accounts: Banks require ID to open an account. This makes it harder for them to save money and therefore become self-sustainable.
- Sign leases: Many landlords require ID to rent an apartment and sign leases. Without IDs the pool of housing available to low-income residents becomes smaller than it already is.
- Obtain marriage certificates: The DC Marriage Bureau requires a US ID or a passport to procure a marriage certificate. So, many migrants cannot get married in DC. This is an issue in some asylum cases where it may be beneficial to get married before submitting an application so a spouse can be a dependent.
- Obtain birth certificates: Mothers who don't meet the ID requirements struggle to get birth certificates for their newborns through Vital Records. Currently, there are 15+ babies born to recently arrived migrant parents in DC without birth certificates. When couples are not married, fathers without ID require a notary to be added to the birth certificate.
- Access community resources: Certain community resources such as adult education programs, food, libraries, community centers, etc. require identification and/or proof of residency to access their services, which are especially critical for recently arrived migrants.
- Complete applications for immigration relief: Without state-issued ID, migrants are unable to complete their applications for immigration relief. After applying for pathways to immigration status such as asylum, migrants must attend an appointment to provide biometrics information to the Department of Homeland Security (DHS). However, the U.S. Citizenship and Immigration Services (USCIS) requires that the applicant present a state-issued ID to complete this appointment. If biometrics are not completed, the application is forfeited.

LPCs exist to expand access to identification to all DC residents, however, due to current implementation many DC residents are unable to obtain any form of identification cards or driver's licenses. **Here, we propose changes in eligibility requirements and the list of documents that are accepted to prove identity and residency.** By implementing these changes, the DC Council will make LPCs available to some of the most vulnerable people in the District.

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<sup>1</sup> Version history can be found in Section V. Most recent version: September 20th, 2023.

## I. [Eligibility](#)

Current Requirements
<ul style="list-style-type: none"> <li>● Resided in the District for longer than 6 months</li> <li>● Has not been assigned a social security number               <ul style="list-style-type: none"> <li>○ Has been assigned a social security number but cannot establish legal presence in the United States at the time of application* or</li> <li>○ Is ineligible to obtain a social security number</li> </ul> </li> </ul> <p><i>*Have been assigned a SSN but cannot establish legal presence refers to “individuals who had been assigned a [SSN] but who are no longer eligible for [one].” (<a href="#">B20-0694 Committee Report</a>)</i></p>

Proposed Changes	Justification
<p>Remove six-month residency requirement</p> <p>States<sup>2</sup> without a residency time requirement: CA, HI, MA, MN, NV, NJ, NM, OR, UT, VT, WA.</p> <p>Municipalities: NYC, CHI, PHL</p>	<p>LPCs have a six month residency requirement which is inconsistent with DC law – 1) DMV REAL IDs do not have the same requirement (<a href="#">18 DCMR § 103 (2022)</a>), 2) it is not a requirement to access public benefits (<a href="#">§ 4-205.03</a>), and 3) it is not a requirement to vote (<a href="#">§ 1-1001.02(2)(C)</a>). Now that the <a href="#">Local Residents Voting Rights Amendment Act of 2022</a> is enacted, many DC residents who are immigrants will be able to vote in the next election but not able to obtain an ID.</p> <p>Additionally, current regulations require LPC applicants to provide two documents to prove six month residency. This is in addition to the two documents needed to prove current DC residency. This means LPC applicants, who are all immigrants, need to provide a total of four proof of residency documents to obtain ID, an insurmountable barrier for many.</p>
<p>Remove the social security number and inability to establish legal presence requirements and allow anyone to obtain an LPC.</p>	<p>The requirement that individuals certify that they do not currently have a valid social security number excludes individuals who do have a valid social security number but cannot prove current legal immigration status (e.g., an individual with an expired green card or a lost or damaged certificate of naturalization).</p>

<sup>2</sup> Currently, there are 21 states, including DC and Puerto Rico, that have passed legislation to allow residents who cannot prove lawful presence in the country to obtain IDs and/or driver’s licenses; 20 already issue these LPCs, with Minnesota beginning implementation on October 1st, 2023. Throughout this memo we make comparisons to these 21 states’ laws and regulations. We have also included comparisons to three municipalities that issue their own IDs — New York City, Chicago, and Philadelphia. We chose these three because they, like DC, are receiving cities for Texas Governor Abbott’s migrant busing program.

<p>States that do not require an applicant to be ineligible for a social security number to obtain an LPC: HI, MA, MN, NV, NJ, NM, NY, OR, VT, WA.</p> <p>Municipalities: NYC, CHI, PHL</p>	<p>Additionally, this requirement excludes individuals that do have a valid social security number but are unable to provide the proof of identity documents required to obtain a REAL ID (e.g., an individual who is unhoused or housing insecure and is not currently in possession of their birth certificate).</p>
<p>Require only one document for proof of residency</p> <p>States that only require one proof of residency document for limited purpose credentials: CA, CO, MA, NJ, NY, OR, WA.</p> <p>Municipalities: NYC, CHI, PHL</p>	<p>LPCs require two documents to prove that you live in DC. This is inconsistent with other parts of DC law, for example accessing homeless services under HSRA only requires one document to prove residency (<a href="#">§ 4-751.01(32)(A)(iii)</a>).</p> <p>While the federal government requires two proof of residency documents to obtain a REAL ID (<a href="#">6 CFR § 37.11</a>), there is no federal requirement for LPCs .</p>

## II. Documents

### A. Proof of Identification

<p><b>Currently accepted documents</b></p>
<p><u>Primary sources (one required):</u></p> <ul style="list-style-type: none"> <li>● Original valid, unexpired passport;</li> <li>● Original valid unexpired Consular Identification Card issued by Mexico, Guatemala, Ecuador or any other country approved by the Department of Motor Vehicles;</li> <li>● Unexpired United States military or dependent identification card;</li> <li>● Certified copy of birth certificate; or</li> <li>● For an identification card only, Department of Motor Vehicles' approved letter with picture from the Court Services and Offender Supervision Agency (CSOSA) or DC Department of Corrections certifying identity and date of birth.</li> </ul>
<p><u>Secondary sources (two required if no primary source):</u></p> <ul style="list-style-type: none"> <li>● Certified copy of foreign jurisdiction issued birth certificate;</li> <li>● Foreign jurisdiction issued driver license or identification card;</li> <li>● Certified school record; or</li> <li>● Any other documents adopted as acceptable by the Department of Motor Vehicles through written approval.</li> </ul>

Proposed Changes	Justification
<p>Include Foreign Passports and Foreign Driver's Licenses or IDs, unexpired or expired within the past 5 years as primary sources for proof of identity.</p> <p>States that allow expired foreign documents for proof of identification: CO, CT, HI, IL, MN, NJ, NY, OR, RI, VA, WA. Municipalities: NYC, CHI, PHL.</p>	<p>Recently arrived asylum-seekers are unable to provide the documentation required to obtain this ID. Most who arrive in DC have had their documents (i.e., passport, birth certificate) confiscated by Customs and Border Protection (CBP) and/or Immigration and Customs Enforcement (ICE) and if their documents are returned it will only be after the culmination of their immigration case which may last years. Therefore, many asylum-seekers only have photos or copies of identity documents from their home countries or expired documents that were not confiscated.</p>
<p>Include photocopies of Foreign Passports as secondary sources for proof of identity.</p> <p>NYC allows photocopies of foreign passports as proof of identification.</p>	<p>Additionally, many undocumented immigrants and asylum-seekers are unable to renew their passports and other foreign IDs after they arrive in the US and therefore are only able to provide expired documents.</p>
<p>Include Foreign Birth Certificates, Foreign Driver's Licenses or other Municipal ID as primary sources for proof of identity.</p> <p>States that allow foreign birth certificates, driver's licenses or other ID as primary proof of identification: HI, MN, NJ, NM, UT, VA.</p>	<p>Occasionally asylum-seekers only have their passport confiscated by CBP, allowing foreign birth certificates, driver's licenses, and other municipal IDs as primary sources will allow them to obtain LPCs in the absence of a passport.</p> <p>These are also common state-issued documents that other immigrants possess and therefore should be accepted.</p>
<p>Include federally-issued immigration documents as sources for proof of identity.</p> <p><u>Primary sources (with photo ID):</u></p> <ul style="list-style-type: none"> <li>● <a href="#">Form I-220A</a>: Order of Release on Recognizance</li> <li>● <a href="#">Form I-220B</a>: Order of Supervision</li> <li>● <a href="#">Form I-94</a> with photo: DHS Arrival/Departure Record or Parole document</li> <li>● <a href="#">Form I-385</a>: Notice to Report or Alien Booking Record</li> <li>● <a href="#">Office of Refugee Resettlement (ORR) Verification of Release Form</a></li> </ul>	<p>The Department of Homeland Security considers federally-issued immigration documents as acceptable forms of identification, as they have name, date of birth, photo, and other biographic and biometric information. These documents can be used to travel and gain access to federal government buildings. However, the DC DMV, as well as other agencies, <u>will not</u> accept immigration paperwork as a form of identification.</p> <p>DC DMV employees regularly advise immigrants to get passports or consular cards</p>

<ul style="list-style-type: none"> <li>• <a href="#">Form I-766</a>, not expired more than 5 years: Employment Authorization Card</li> <li>• <a href="#">Form I-551</a>, not expired more than 5 years: Permanent Resident Card</li> <li>• <a href="#">Form I-327</a>: Permit to Reenter the United States</li> <li>• <a href="#">Form I-571</a>: Refugee Travel Document</li> <li>• <a href="#">Border Crossing Card</a></li> <li>• <a href="#">ICE check-in log</a></li> </ul> <p><u>Secondary sources (without photo ID):</u></p> <ul style="list-style-type: none"> <li>• <a href="#">Form I-862</a>: Notice to Appear (NTA)</li> <li>• <a href="#">Form I-94</a>: DHS Arrival/Departure Record or Parole Document</li> <li>• <a href="#">Form I-797</a>: Notice of Action</li> <li>• <a href="#">Form I-589</a>, with proof of submission or Notice of Action: Application for Asylum and for Withholding of Removal</li> <li>• <a href="#">Form I-765</a>, with proof of submission or Notice of Action: Application for Employment Authorization</li> <li>• <a href="#">Form DS-2019</a>: Certificate of Eligibility for Exchange Visitor</li> <li>• <a href="#">Form I-20</a>: Certificate of Eligibility for Non-Immigrant Student Status</li> </ul>	<p>from their embassies which 1) is not possible for migrants who come from countries the US does not have consular relations with (e.g. Venezuela) or who are stateless; 2) immigration attorneys regularly advise asylum-seekers to not have contact with their embassies or consulates because it could be used against them in their asylum hearings as they must prove they are actually seeking protection from their countries of origin; 3) embassies and consulates often function poorly and are unresponsive; 4) most embassies require an applicant to have a government issued ID to apply for a passport and will not make an exception if a person's documents have been confiscated. So, even if migrants can contact their embassies without jeopardizing their asylum cases, they are stuck in a bureaucratic Catch-22 in which they cannot get a passport without an ID and cannot get an ID without a passport.</p> <p>Additionally, unaccompanied migrant children who arrive without their guardians often lack documents needed to get IDs when they are released from ORR custody, making it difficult to access services and thrive in the US.</p>
<p>Include Certificate of Citizenship (Form N-560, Form N-561, and Form N-645) and Certificate of Naturalization (Form N-550, Form N-570, and Form N-578) as primary sources for proof of identity.</p>	<p>These documents can be used to prove residency to obtain a REAL ID (<a href="#">6 CFR § 37.11</a>). If we allow anyone to apply for an LPC then these documents should be included for LPC proof of identity as well. Most states allow these documents as proof of identity.</p>
<p>Include photocopies of any accepted proof of identity document obtained through a Freedom of Information Act Request, with letter of acknowledgement from the issuing agency.</p>	<p>Identity documents such as passports, identification cards, legal permanent resident cards, and certificates of naturalization are kept within records of different government agencies, such as USCIS or the State Department. DC residents should be able to present records of these identification documents if accompanied by verification that they were released to the applicant as part of a Freedom of Information Act Request.</p>

Immigration Document Breakdown	
Primary Sources (with photo ID)	Allowed as proof of identity in
<a href="#">Form I-220A</a> : Order of Release on Recognizance	<p>While these are currently not accepted by other states, they are some of the most common proof of identity documents that recently arrived asylum-seekers have in their possession. Additionally, New York City and Philadelphia allow Forms I-220A and I-220B as proof of identification for their municipal ID. <i>It is essential that these documents are included as sources for proof of identity for LPCs.</i></p>
<a href="#">Form I-220B</a> : Order of supervision	
<a href="#">ICE check-in log</a>	
<p><a href="#">Form I-94</a>: DHS Arrival/Departure Record or Parole document. Asylum-seekers who receive parole are given I-94s that have their photo and a DHS parole stamp.</p> <p><b>Note:</b> <i>The DC DMV already accepts multiple subtypes of the I-94 as <a href="#">proof of lawful presence</a> to obtain a REAL ID. So, DMV employees should be familiar with this document. This would add an I-94 subtype that does not prove lawful presence but can be used to prove identity to obtain an LPC.</i></p>	<p>States: CT, NJ, NM Municipalities: NYC, CHI, PHL</p>
<p><a href="#">Form I-385</a>: Notice to Report or Alien Booking Record</p>	<p>States: NY Municipalities: NYC</p>
<p><a href="#">ORR Verification of Release Form</a></p>	<p>NYC, CHI, PHL</p>
<p><a href="#">Form I-766</a>: Employment Authorization Card, not expired more than 5 years</p> <p><b>Note:</b> <i>The DC DMV already accepts unexpired I-766s as proof of ID to obtain a REAL ID. So, DMV employees should be familiar with it. However, when it expires it cannot be used to obtain a REAL ID but it can be used as proof of identity for an LPC.</i></p>	<p>States: MN, NV, NJ, NM, NY, OR, RI, UT, VA, WA Municipalities: NYC, CHI, PHL</p> <p><u>Expired:</u> NJ, NY, OR, VA, and PHL</p>

<p><a href="#">Form I-551</a>: Permanent Resident Card, not expired more than 5 years</p> <p><b>Note:</b> <i>The DC DMV already accepts unexpired I-551s as proof of ID to obtain a REAL ID. So, DMV employees should be familiar with it. However, when it expires it cannot be used to obtain a REAL ID but it can be used as proof of identity for an LPC.</i></p>	<p>NJ, NM, OR, UT, VT, WA, NYC</p> <p><u>Expired:</u> NJ, NY, OR, VA, WA</p>
<p><a href="#">Form I-327</a>: Permit to Reenter the United States</p>	<p>NJ, NY, OR, RI, VA, WA</p>
<p><a href="#">Form I-571</a>: Refugee Travel document</p>	<p>NJ, NY, OR, RI, UT, VA, WA</p>
<p><a href="#">Border Crossing Card</a></p>	<p>CT, NY, OR, VA, WA</p>
<p><b>Secondary Sources (without photo ID)</b></p>	<p><b>Allowed as proof of identity in</b></p>
<p><a href="#">Form I-862</a>: Notice to Appear (NTA)</p>	<p>This is a common document that recently arrived asylum-seekers possess. See I-220 for why including this form is essential. Accepted by NYC.</p>
<p><a href="#">Form I-797</a>: Notice of Action</p> <p><b>Note:</b> <i>The DC DMV already accepts the I-797 in certain cases as <a href="#">proof of lawful presence</a> to obtain a REAL ID, as well as proof of identity for six month credentials. So, DMV employees should be familiar with it.</i></p>	<p>States: RI, VA Municipalities: NYC, CHI</p>
<p><a href="#">Form I-589</a>: Application for Asylum and for Withholding of Removal, with proof of submission or Notice of Action</p>	<p>CA, HI</p>
<p><a href="#">Form I-765</a>: Application for Employment Authorization, with proof of submission or Notice of Action</p>	<p>While this is currently not accepted by other states, with the Biden administration's recent border policy changes, asylum-seekers who use the CBP One mobile app to make an appointment and receive parole for at least one year can apply for work authorization before asylum. These migrants would have proof of submission for I-765s before I-589s.</p>

<a href="#">Form DS-2019</a> : Certificate of Eligibility for Exchange Visitor (J-1) Status	CA, HI, WA
<a href="#">Form I-20</a> : Certificate of Eligibility for Non-Immigrant Student Status	CA, HI, MN, WA

## B. Proof of Residency

<b>Currently accepted documents - 18 DCMR § 114.5 (2022)</b>
<ul style="list-style-type: none"> <li>(a) Utility (water, gas, electric, oil, or cable), home security system, or automobile or personal loan bill, issued within the last sixty (60) days;</li> <li>(b) Telephone bill issued within the last sixty (60) days;</li> <li>(c) Deed, settlement agreement, or mortgage statement;</li> <li>(d) Unexpired lease, sublease, or rental agreement (may be a photocopy). If a sublease is being submitted, the lease must also be provided;</li> <li>(e) District of Columbia property tax bill or tax assessment issued within the last 12 months</li> <li>(f) Unexpired homeowner's or renter's insurance policy;</li> <li>(g) For an identification card only, a Department of Motor Vehicles' approved letter with a picture from the Court Services and Offender Supervision Agency (CSOSA), District of Columbia Department of Corrections or U.S. Probation Office issued within the last sixty (60) days certifying residence address. A second document is not required;</li> <li>(h) Official mail received from a federal or District of Columbia agency, other than the District of Columbia Department of Motor Vehicles, within the last sixty (60) days or a change of address notification from the U.S. Postal Service;</li> <li>(i) Repealed;</li> <li>(j) <i>Proof of DC Residency Certification (below)</i></li> <li>(k) For an identification card only, a District of Columbia Department of Motor Vehicles' approved letter from a certified social service provider;</li> <li>(l) Any other documents deemed acceptable by the Director through written approval.</li> <li>(m) Documentation and a form approved by the Department of Motor Vehicles and received pursuant to the Address Confidentiality Program authorized by the Address Confidentiality Act of 2018, effective July 3, 2018.</li> </ul>
<p><u>Proof of DC Residency Certification form requirements (j)</u></p> <p>(1) If unable to provide two (2) of the documents listed in Subparagraphs (a)-(i) of this paragraph, submit a District of Columbia Department of Motor Vehicles Proof of Residency form signed by the person owning or renting the residence where the applicant resides and a copy of this person's unexpired District of Columbia driver license or identification card as well as two (2) of the documents listed in Subparagraphs (a)-(h) of this subsection in the name of the person owning or renting the residence as follows:</p> <p>(A) One (1) of the proof of residency documents set forth in either (a), (b), (f), or (g) above</p>



(B) One (1) of the proof of residency documents set forth in either (c), (d), or (e) above. If the document provided is a sublease, the lease must name the certifier as the sublessor

(2) A person certifying residency under this Subparagraph (i), may only submit a certification three (3) times in a twelve (12) month period, unless it is for a “family member”. “Family member” shall mean spouse, domestic partner, as that term is defined in D.C. Official Code § 32-701(3), parent or child (whether natural, adopted, or foster). If a Proof of Residency form is used for a “family member”, documentation, as determined by the Director, showing the relationship must also be submitted.

Proposed Changes	Justification
<p>Require only one document for proof of residency</p> <p>States that only require one proof of residency document for their LPC: CA, CO, MA, NJ, NY, OR, WA</p> <p>Municipalities: NYC, CHI, PHL</p>	<p>LPCs require two documents to to prove current DC residency (and two more to prove six month residency). This is inconsistent with other parts of DC law, for example accessing homeless services under HSRA only requires one document to prove residency (<a href="#">§ 4-751.01(32)(A)(iii)</a>). While two proofs are required by federal law to obtain a REAL ID, there is no reason to require it for LPCs.</p>
<p>Include the following as accepted documents for proof of residency:</p> <ul style="list-style-type: none"> <li>● Medical Documents (Medical bill issued within the last 60 days, Certified medical record not older than one year, Current medical, vision, or dental insurance card)</li> <li>● Financial Statements (Bank, Credit card, loan statement issued within the last 60 days)</li> <li>● Employment Documentation (Paycheck, Paystub, W-2 or 1099 Form, Pension or Retirement statement issued within the last 60 days)</li> <li>● School Records (Transcript, Report card, Tuition bill or payment receipt from DC educational institution, issued within the last 6 months)</li> <li>● Rent receipt issued within the last 60 days (not handwritten)</li> </ul>	<p>Currently, many DC residents are unable to obtain any form of identification because the list of acceptable proof of residency documents is extremely limited.</p> <p>The effect of such a limited list is that it excludes low-income residents and those experiencing housing instability from establishing their residency. As a result, Black and brown residents of the District face a disparate impact in that they are disproportionately unable to obtain identification.</p>

<ul style="list-style-type: none"> <li>• Statement from Department of Human Services issued within the last 60 days about applicant's eligibility for DC benefits</li> <li>• Statement from the Social Security Administration issued within the last 60 days</li> <li>• Federal or DC tax return not older than one year</li> <li>• U.S. Postal Service change of address confirmation received within the last 60 days</li> <li>• Voter Registration Card</li> </ul>	
<p>Remove the envelope requirement for official government mail if the document has an address and date</p>	<p>Many government agencies now use paperless contact. It is outdated to require an envelope in 2023.</p>
<p>Accept any document that is accepted as a standard proof of residency for Proof of DC Residency Certification</p>	<p>DC should eliminate the requirement that a certifier show one primary and one secondary document to prove residency. Instead, the certifier should be able to present any two documents from standard list residency proofs, including the documents listed above.</p>
<p>Remove the proof of relationship requirement from the Proof of DC Residency Certification form</p>	<p>Requires original full birth certificate reflecting both parent/child names, original adoption court order reflecting both parent/child names, original marriage license, or certified copy of a domestic partnership which many applicants do not have. Additionally, it doesn't account for chosen family.</p>

### III. [Acknowledgements](#)

This memo was prepared by Migrant Solidarity Mutual Aid, with support and input from DC Volunteer Lawyers Project, Bread for the City, Washington Legal Clinic for the Homeless, Foundry United Methodist Church, DC Fiscal Policy Institute, and Kids in Need of Defense (KIND). For questions contact Madhvi Venkatraman at [madhvi.v@gmail.com](mailto:madhvi.v@gmail.com).

For more details about how lack of ID affects recently arrived asylum-seekers read *Residing but Not Residents: The Lack of Long-Term Support for Asylum-Seekers in Washington, DC*. [bit.ly/residing-not-residents](https://bit.ly/residing-not-residents)

## IV. References for State and Municipality Comparisons

### States

- California: [www.dmv.ca.gov/portal/file/ab-60-user-friendly-guide-english-pdf/](http://www.dmv.ca.gov/portal/file/ab-60-user-friendly-guide-english-pdf/)
- Colorado: [dmv.colorado.gov/sites/dmv/files/documents/DR\\_2300C\\_2022.pdf](http://dmv.colorado.gov/sites/dmv/files/documents/DR_2300C_2022.pdf)
- Connecticut: [portal.ct.gov/-/media/DMV/20/29/DI4pdf.pdf](http://portal.ct.gov/-/media/DMV/20/29/DI4pdf.pdf)
- Delaware: [www.dmv.de.gov/DriverServices/drivers\\_license/DPC/index.shtml](http://www.dmv.de.gov/DriverServices/drivers_license/DPC/index.shtml)
- District of Columbia: [mv.dc.gov/node/1115407](http://mv.dc.gov/node/1115407)
- Hawaii:  
[hidot.hawaii.gov/highways/files/2019/11/Limited-Purpose-DL-Info-and-FAQ-Pamphlet-2019-11-13.pdf](http://hidot.hawaii.gov/highways/files/2019/11/Limited-Purpose-DL-Info-and-FAQ-Pamphlet-2019-11-13.pdf) +  
[www.hawaiicounty.gov/departments/finance/vehicle-registration-licensing/limited-purpose-instruction-permit-provisional-driver-license-and-driver-s-license/limited-purpose-license-additional-required-documents](http://www.hawaiicounty.gov/departments/finance/vehicle-registration-licensing/limited-purpose-instruction-permit-provisional-driver-license-and-driver-s-license/limited-purpose-license-additional-required-documents)
- Illinois: [www.ilsos.gov/publications/pdf\\_publications/dsd\\_tvdl17.pdf](http://www.ilsos.gov/publications/pdf_publications/dsd_tvdl17.pdf)
- Maryland: [mva.maryland.gov/drivers/Pages/non-compliant-drivers-licenses.aspx](http://mva.maryland.gov/drivers/Pages/non-compliant-drivers-licenses.aspx)
- Massachusetts: [www.mass.gov/doc/standard-drivers-license-acceptable-id-checklist/download](http://www.mass.gov/doc/standard-drivers-license-acceptable-id-checklist/download)
- Minnesota: [www.ilcm.org/latest-news/frequently-asked-questions-drivers-licenses-for-all/](http://www.ilcm.org/latest-news/frequently-asked-questions-drivers-licenses-for-all/)
- Nevada: [dmv.nv.gov/dlresidency.htm](http://dmv.nv.gov/dlresidency.htm)
- New Jersey: [www.state.nj.us/mvc/pdf/license/Standard\\_License\\_Sheet\\_Engl.pdf](http://www.state.nj.us/mvc/pdf/license/Standard_License_Sheet_Engl.pdf)
- New Mexico: [www.mvd.newmexico.gov/wp-content/uploads/2023/05/RevisedStandardacceptabledocs3.10.23.pdf](http://www.mvd.newmexico.gov/wp-content/uploads/2023/05/RevisedStandardacceptabledocs3.10.23.pdf)
- New York: [dmv.ny.gov/forms/id44.pdf](http://dmv.ny.gov/forms/id44.pdf)
- Oregon: [www.oregon.gov/odot/DMV/Pages/DriverID/IDProof.aspx](http://www.oregon.gov/odot/DMV/Pages/DriverID/IDProof.aspx)
- Puerto Rico: [cesco.turnospr.com/](http://cesco.turnospr.com/)
- Rhode Island: [dmv.ri.gov/licenses-permits-ids/drivers-privilege-cards-faqs](http://dmv.ri.gov/licenses-permits-ids/drivers-privilege-cards-faqs)
- Utah: [dld.utah.gov/wp-content/uploads/sites/17/2023/04/DLD-335-English-REV-4.23-.pdf](http://dld.utah.gov/wp-content/uploads/sites/17/2023/04/DLD-335-English-REV-4.23-.pdf)
- Vermont: [dmv.vermont.gov/sites/dmv/files/documents/VL-021-License\\_Application.pdf](http://dmv.vermont.gov/sites/dmv/files/documents/VL-021-License_Application.pdf)
- Virginia: [www.dmv.virginia.gov/webdoc/pdf/dmv309.pdf](http://www.dmv.virginia.gov/webdoc/pdf/dmv309.pdf)

### Municipalities

- New York City: [www.nyc.gov/site/idnyc/card/documentation.page](http://www.nyc.gov/site/idnyc/card/documentation.page)
- Chicago: [www.chicityclerk.com/sites/default/files/EN\\_Document%20Guide%3AResidency.pdf](http://www.chicityclerk.com/sites/default/files/EN_Document%20Guide%3AResidency.pdf)
- Philadelphia: [www.getphlcityid.com/Home/Calculator](http://www.getphlcityid.com/Home/Calculator)

## V. Version History

- June 8th, 2023: Original draft
- June 23rd, 2023:
  - Added the ORR Verification of Release Form
  - Added NYC comparisons
- July 10th, 2023:
  - Expanded background section to include explanations about each barrier lack of ID causes
  - Added additional explanation about the important of the ORR Verification of Release Form
- August 1st, 2023:
  - Edited background to include information about immigrants in DC who are not recently arrived asylum-seekers
  - Added Massachusetts, Chicago, and Philadelphia comparisons
  - Added notes about what forms the DC DMV should already be familiar with
  - Expand details about expired I-551 and EADs
  - Expanded explanation on why removing the six month residency requirement is important
  - Added Non-REAL ID Requirements by State References
  - Added Version History
- September 20th, 2023
  - Added inability to drive legally as a issue that residents who can't obtain an LPC face
  - Added Hawaii to states that accept foreign documents for proof of identity
  - Added list of states that do not require an applicant to be ineligible for a SSN to obtain an LPC
  - Clarified contexts in which DMV employees would be familiar with certain immigration documents
  - Simplified and expanded list of proposed documents to be accepted for proof of residency and for residency certification
  - Updated Migrant Solidarity Mutual Aid Network to new name Migrant Solidarity Mutual Aid