GAO

HOMELESSNESS

Barriers to Obtaining ID and Assistance Provided to Help Gain Access

Accessible Version

Report to Congressional Committees

February 2024
GAO-24-105435
United States Government Accountability Office

GAO Highlights

February 2024

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Why GAO Did This Study

Having an ID is essential to taking certain steps to exit homelessness, such as gaining employment, securing housing, or accessing government benefits. The Joint Explanatory Statement accompanying the Consolidated Appropriations Act, 2022 and House Report 117-402, accompanying H.R. 8294, 117th Cong. (2022), include provisions for GAO to review issues related to ID barriers faced by individuals experiencing homelessness.

This report examines (1) barriers the homeless population may encounter in obtaining an ID and options to mitigate those barriers; (2) the types of ID assistance services supported by federal homelessness assistance programs; and (3) ID requirements for HUD housing programs.

GAO reviewed applicable laws and regulations, agency policies, and relevant academic literature. GAO also collected information from federal agencies on selected homelessness and rental assistance programs through standardized data collection instruments. GAO interviewed officials from federal agencies and homeless advocacy groups and from nongeneralizable samples of state ID-issuing agencies, public housing agencies, and homelessness assistance providers, chosen to reflect a variety of sizes, locations, programs, and strategies for overcoming ID barriers.

What GAO Found

People experiencing homelessness may encounter several barriers when attempting to obtain a government ID, according to studies GAO reviewed and interviews GAO conducted. Homeless individuals often lack a reliably safe place to store IDs and other important personal documents, making these items subject to loss, destruction by the elements, and theft. Items may also be discarded when these individuals and their belongings are removed from an area. Once ID documents are lost, replacing them can be especially difficult. Further, people experiencing homelessness may have difficulty providing a residential address for the purposes of applying for an ID. These individuals also may not be able to pay for the cost of obtaining an ID or to access transportation or technology needed to apply for an ID. Additionally, homeless youth may not be able to obtain parental consent to obtain an ID.

To mitigate some of these barriers, several states allow third parties, such as social workers or shelter employees, to verify the residence of people experiencing homelessness by signing affidavits confirming their address (such as the address of a shelter). Some cities have created digital lockers to help these individuals maintain electronic copies of IDs and other essential documents. In addition, seven of the 10 states GAO reviewed offer a type of ID that can be obtained more easily than a REAL ID—ID that meets federal security standards and may be used by federal agencies for certain official purposes. This alternative to a REAL ID allows for a wider range of documents to verify identity, such as military or school records, court documents, and expired IDs. A trade-off to some of these mitigation options is that they may increase the risk of fraud.

Federal homelessness assistance programs GAO reviewed allow providers to use program funds to help individuals obtain ID. For example, agencies permit grant funds to be used to

- help individuals navigate the process of getting an ID, such as through case management;

- provide financial assistance associated with obtaining ID; and

- help arrange for transportation to ID offices.

For applicants to be eligible for the Department of Housing and Urban Development's (HUD) largest rental assistance programs, public housing agencies or property owners must verify their Social Security number and citizenship or eligible immigration status. In addition, public housing agencies and property owners may require applicants to demonstrate legal identity and age, which may present ID-related barriers to accessing these programs. However, public housing agencies reported that most applicants experiencing homelessness have the required documentation by the time they are offered housing assistance because they have typically been working with homelessness assistance providers to obtain the needed documents.

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Abbreviations

DHS	Department of Homeland Security
HHS	Department of Health and Human Services
HUD	Department of Housing and Urban Development
ID	identification
PHA	public housing agency
VA	Department of Veterans Affairs

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People experiencing homelessness face a number of barriers in obtaining a government ID, such as a driver's license, and keeping it safe.[1] Without an ID, it may be difficult to take certain steps to exit homelessness, such as gaining employment, securing housing, or accessing government benefits.

The Joint Explanatory Statement accompanying the Consolidated Appropriations Act, 2022 and House Report 117-402 accompanying H.R. 8294, 117th Cong. (2022) include provisions for us to review issues related to ID barriers faced by individuals experiencing homelessness. This report examines (1) barriers people experiencing homelessness may encounter in obtaining an ID and options to mitigate those barriers, (2) federal homelessness assistance programs that support ID assistance services, and (3) the ID requirements for the Department of Housing and Urban Development's (HUD) rental assistance programs and the homeless population's ability to meet these requirements.

To address our first objective, we reviewed academic, government, advocacy group, and think-tank literature related to homelessness and ID. To address our second and third objectives, we reviewed applicable federal laws and regulations, as well as agency policies and guidance. Additionally, we submitted standardized data collection instruments to each of the homelessness assistance and housing programs under review. To determine the programs covered in these instruments, we asked agencies to identify their homelessness assistance programs that may provide ID assistance and their rental assistance programs that provided more than $10 million in direct rental assistance in fiscal year 2022, the most recent year available at the time of our review. These instruments asked federal agencies about the types of ID services supported by homelessness assistance programs and ID requirements to participate in rental assistance programs.

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[1]We use "ID" to refer specifically to state-issued photo ID, including driver's licenses or other official photo identification.

For our third objective, we focused on three of HUD's rental assistance programs: Housing Choice Voucher, Project-Based Rental Assistance, and Public Housing. We selected these programs because they were the three largest federal rental assistance programs in terms of dollars appropriated in fiscal year 2022.

To answer all three objectives, we also interviewed representatives of federal agencies, trade associations, and homeless advocacy groups, as well as nongeneralizable selections of state ID-issuing agencies, public housing agencies (PHA), and homelessness assistance providers.[2] We selected ID-issuing agencies in 10 states with large homeless populations and with strategies for mitigating barriers to obtaining ID faced by people experiencing homelessness.[3] We selected 10 PHAs in total from these states, chosen to include a range of sizes and geographic locations. Finally, we selected 12 providers of homelessness assistance programs from these states, chosen to represent a range of programs and sizes, and based on whether federal agencies had identified them as offering ID services.[4] Appendix I provides more information on our objectives, scope, and methodology.

We conducted this performance audit from September 2021 to February 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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[2]The federal agencies we reviewed for this report are the Department of Health and Human Services, HUD, the Department of Veterans Affairs, the Department of Homeland Security, the Department of Justice, the Social Security Administration, and the U.S. Interagency Council on Homelessness.

[3]The states we reviewed for this report are California, Florida, Maryland, Massachusetts, New York, Ohio, Oregon, Pennsylvania, Texas, and Washington.

[4]In this report, homelessness assistance providers refer to grantees of federal homelessness assistance programs that provide direct services to individuals, and grantees that distribute the grant funds to other organizations to carry out direct services.

Background

Homelessness and Its Causes

HUD's *2023 Annual Homelessness Assessment Report to Congress* reported that on a single night in 2023, roughly 653,100 people were experiencing homelessness in the United States.[5] About 60 percent were staying in sheltered locations, such as emergency shelters, safe havens, or transitional housing programs.[6] The remainder were in unsheltered locations, such as on the street, in abandoned buildings, or in other places not suitable for human habitation.

Homelessness cannot generally be attributed to a single factor but is often the result of the interaction of a multitude of factors. One key factor is housing costs. In a 2020 report, we found a statistically significant relationship between changes in household median rents and changes in rates of homelessness.[7] We reported that experts also cited poverty, job loss, eviction, mental health and substance use challenges, incarceration, and domestic violence as potential causes of homelessness.

REAL ID and Other State-Issued Identification

The REAL ID Act of 2005, as amended (REAL ID Act), sets minimum security standards for the issuance and production of state-issued driver's licenses and identification cards to ensure acceptance by federal agencies for official purposes. The act establishes procedures and requirements that states must follow to verify the identity of license and

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[5]Department of Housing and Urban Development, *The 2023 Annual Homelessness Assessment Report (AHAR) to Congress Part 1: Point-in-Time Estimates of Homelessness* (Washington, D.C.: Dec. 2023).

[6]A safe haven is a form of supportive housing that serves hard-to-reach homeless persons with severe mental illness who come primarily from the streets and have been unable or unwilling to participate in housing or supportive services.

[7]GAO, *Homelessness: Better HUD Oversight of Data Collection Could Improve Estimates of Homeless Population*, GAO-20-433 (Washington, D.C.: July 14, 2020).

identification card applicants before issuing the ID.[8] Enforcement of the REAL ID Act will begin on May 7, 2025, and the Department of Homeland Security (DHS) oversees its implementation.

While states are not required to issue REAL ID-compliant ID, if they choose not to, the licenses and identification cards they issue will no longer be accepted for official purposes as defined in the act. These purposes include boarding commercial aircraft, entering federal buildings, and entering nuclear power plants. As of August 2023, 55 of 56 states and territories were issuing REAL ID–compliant ID.[9]

The REAL ID Act requires those applying for compliant identification to provide documentation demonstrating their identity, date of birth, Social Security number or evidence of ineligibility for a Social Security number, address of principal residence, and evidence of lawful status. The REAL ID Modernization Act removed the requirement that applicants provide documentation of their Social Security number and allows applicants to simply provide their number to the state when applying for compliant ID.[10] However, DHS officials described the provision of a Social Security number as a minimum standard and noted that states can still choose to require applicants to provide documentation of their Social Security number. The regulations implementing the REAL ID Act specify the types of documents that will be accepted to demonstrate personal information categories (see table 1).[11]

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[8]Pub. L. No. 109-13, div. B, 119 Stat. 231, 302. Title II of the REAL ID Act addresses driver's license security and is codified at 49 U.S.C. § 30301 note. The REAL ID Act of 2005 has been subsequently amended by the Court Security Improvement Act of 2007, Pub. L. No. 110-177, § 508, 121 Stat. 2534, 2543 (2008), the REAL ID Act Modification for Freely Associated States Act, Pub. L. No. 115-323, 132 Stat. 4443 (2018), the REAL ID Modernization Act, Pub. L. No. 116-260, div. U, title X, 134 Stat. 1182, 2304-2306 (2020), and the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Pub. L. No. 116-136, div. B, title VI, § 16006, 134 Stat. 281, 545-546 (2020).

[9]DHS has granted the 56th jurisdiction, American Samoa, an extension pending a final compliance review.

[10]Pub. L. No. 116-260, Div. U, § 1001(c), 134 Stat. 2304 (2020).

[11]6 C.F.R. § 37.11.

Table 1: Examples of Acceptable Documentation Specified by REAL ID Act Implementing Regulations

Personal information categories	Examples of acceptable documentation
Identity (One document required)	Valid, unexpired U.S. passport
	Certified copy of a birth certificate filed with a state office of vital statistics or equivalent agency in the individual's state of birth
	Valid, unexpired Permanent Resident Card (Form I–551) issued by the Department of Homeland Security or the Immigration and Naturalization Service
	REAL ID driver's license or identification card issued in compliance with the standards established by the regulation
Date of birth	At least one document used to demonstrate identity
Social Security number (One document required)	Social Security Administration account number card
	W-2 form
	Pay stub with the applicant's name and Social Security number on it
Evidence of lawful status in the United States (One document required)	Valid, unexpired U.S. passport
	Certified copy of a birth certificate filed with a state office of vital statistics or equivalent agency in the individual's state of birth
	Valid, unexpired Permanent Resident Card (Form I–551) issued by the Department of Homeland Security or the Immigration and Naturalization Service
Address of principal residence	At least two documents of the state's choice that include the individual's name and principal residence. A street address is required except in certain cases as specified in 6 C.F.R. § 37.17(f).

Source: 6 C.F.R. § 37.11. | GAO-24-105435

Note: This table provides selected examples. The regulations set forth a comprehensive list of acceptable documentation. In 2003, the Immigration and Naturalization Service was abolished and its functions were placed under three agencies—U.S. Citizenship and Immigration Services, Immigration and Customs Enforcement, and Customs and Border Patrol—within the Department of Homeland Security.

States may also issue ID that is not compliant with the REAL ID Act, and seven of the 10 states we examined for this review do so.[12] Noncompliant IDs may be used for purposes that are not official purposes as defined in the REAL ID Act, such as obtaining employment, housing, and government benefits.

Each state has its own processes and requirements for issuing a noncompliant ID. States generally require a person to present some combination of supporting documents, such as a birth certificate and Social Security card, to validate identity and residence. The documentation requirements of noncompliant ID are generally more

[12]The states are California, Massachusetts, New York, Ohio, Oregon, Pennsylvania, and Washington.

lenient than for compliant ID—for example, requiring one rather than two proofs of principal residence.

Federal Homelessness Assistance Programs

The Departments of Health and Human Services (HHS), HUD, and Veterans Affairs (VA) all operate programs that provide direct assistance to individuals experiencing homelessness (see table 2). Some of the programs assist specific populations. For example, HHS and HUD administer programs for youth experiencing homelessness. HHS also has homelessness assistance programs for individuals who have serious mental illness, substance use disorder, or co-occurring disorders. VA programs focus on veterans.

These homelessness assistance programs assess individuals' needs and coordinate the delivery of services to meet those needs. As part of these efforts, these programs help individuals access rental housing and other government benefits and services that may require identification documents.

Table 2: Federal Homelessness Assistance Programs

Agency	Program	Program description
Department of Health and Human Services	Runaway and Homeless Youth Program	Grant program that supports street outreach, emergency shelters, and longer-term transitional living and maternity group home programs for youth experiencing homelessness
	Projects for Assistance in Transition from Homelessness	Formula grant program that provides funds to states to provide services for individuals experiencing homelessness (or at imminent risk of homelessness) and who have a serious mental illness or co-occurring serious mental illness and substance use disorder
	Grants for the Benefit of Homeless Individuals	Grant program that supports treatment and services for people experiencing homelessness who have substance use disorders or co-occurring mental and substance use disorders
	Treatment for Individuals Experiencing Homelessness	Grant program that supports treatment and services for people experiencing homelessness who have a serious mental illness, serious emotional disturbance, or co-occurring disorders
Department of Housing and Urban Development	Continuum of Care Program	Grant program to provide funding to quickly rehouse homeless individuals and families and promote access to and use of mainstream programs and to optimize self-sufficiency

Agency	Program	Program description
	Emergency Solutions Grant Program	Grant program that funds street outreach, emergency shelters, homelessness prevention activities, and rapid rehousing assistance
	Youth Homelessness Demonstration Program	Grant program that funds community initiatives aimed at preventing and ending youth homelessness
Department of Veterans Affairs	Supportive Services for Veteran Families	Grant program designed to provide case management and supportive services to address homelessness among very low-income veteran families residing in or transitioning to permanent housing

Source: Departments of Health and Human Services, Housing and Urban Development, and Veterans Affairs. | GAO-24-105435

Note: The federal homelessness assistance programs in this table represent programs that the Departments of Health and Human Services, Housing and Urban Development, and Veterans Affairs identified as providing funding that supports direct identification assistance services for populations experiencing homelessness.

Rental Assistance Programs

HUD provides funding for rental housing assistance programs that allow individuals and families to pay affordable, income-based rents. The three largest programs in terms of fiscal year 2022 appropriations were the Housing Choice Voucher, Public Housing, and Project-Based Rental Assistance programs, and they served over 4 million families. The Housing Choice Voucher and Public Housing programs are administered by PHAs. The Project-Based Rental Assistance program is administered by HUD and PHAs that enter into contracts with private property owners.

The **Housing Choice Voucher program** pays subsidies to landlords so that low-income households can rent apartments or houses available in the private rental market. In general, households must have very low or extremely low incomes, as determined by HUD. An assisted household generally pays 30 percent of its monthly adjusted income in rent. The remaining portion of the rent is paid through a HUD-subsidized voucher. A family may use the voucher anywhere a voucher program is administered. The program served 2.3 million families in 2022.

Under its **Public Housing program**, HUD subsidizes and regulates low-rent public housing developments that are owned and operated by PHAs. Generally, eligible families living in federally subsidized public housing are low income. At least 40 percent of families admitted to a PHA's public housing program each fiscal year must be extremely low-income families (income not exceeding the higher of HHS's poverty guidelines or 30 percent of area median income). Families living in public housing pay the highest of the following amounts toward rent: (1) 30 percent of the

family's monthly adjusted income; (2) 10 percent of the family's monthly income; (3) if a family is receiving welfare payments, an amount designated by the administering public agency; or (4) a minimum rent set by the PHA (up to $50). PHAs receive several streams of funding from HUD to make up the difference between what tenants pay in rent and what it costs to maintain and modernize public housing. The Public Housing program served 860,000 families in 2022.

Under **Project-Based Rental Assistance**, HUD contracts with private property owners to rent housing units to eligible low-income tenants for an income-based rent. No new Project-Based Rental Assistance contracts have been awarded since the mid-1980s; however, existing contracts may be renewed. Project-Based Rental Assistance served 1.3 million families in 2022.

People Experiencing Homelessness Face Barriers in Obtaining ID, but Mitigation Strategies Exist

Barriers to Obtaining ID Include the Need to Demonstrate a Residence and Retain Required Documents

People experiencing homelessness may encounter several barriers when attempting to obtain an ID, according to literature we reviewed and interviews we conducted. These barriers may stem from homelessness, such as requirements to demonstrate a principal residence, or be exacerbated by homelessness, such as difficulty retaining ID or supporting documents.

Requirement to demonstrate a principal residence. People experiencing homelessness typically lack a principal residence with a street address. Many of these individuals are transient, moving frequently between shelters or between sheltered and unsheltered environments. However, the implementing regulations for the REAL ID Act require applicants to provide two forms of documentation demonstrating, with a

street address, their principal residence.[13] Further, most states we reviewed that offered ID that is not compliant with the REAL ID Act required applicants to provide evidence of a principal residence, including a street address.

Difficulty retaining ID or supporting documents. People experiencing homelessness may have difficulty retaining ID or the supporting documents—such as birth certificates or Social Security cards—needed to get an ID. For example, they may lose their ID or supporting documents during an eviction.[14] Additionally, people experiencing homelessness often lack a permanent and secure location to store ID or supporting documents, making them subject to loss, destruction by the elements, or theft.[15] Further, for individuals residing in encampments, ID or supporting documents may be discarded when officials remove people and their belongings from an area, according to one study and three homeless advocacy groups we interviewed.[16]

Cost of ID or supporting documentation. The cost of an ID or supporting documentation can also be a barrier. Across the 10 states we reviewed, applicants must pay, on average, $54 to obtain an ID.[17] There may also be fees associated with getting supporting documentation needed to obtain ID, such as birth certificates. People experiencing homelessness have limited resources and generally prioritize procuring

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[13]DHS officials told us that, for individuals without documentation of a principal residence, the REAL ID requirement to provide two proofs of principal residence is no more burdensome than requiring only one proof. We did not determine whether there are differences in difficulty in obtaining one versus two proofs of principal residence during our review.

[14]Catherine Wiehl, "Reliance on Identification to Secure the Blessings of Liberty and Property," *UMKC Law Review*, vol. 81, no. 2 (2012).

[15]M. Kushel and T. Moore et al., *Toward a New Understanding: The California Statewide Study of People Experiencing Homelessness* (University of California San Francisco, 2023); National Law Center on Homelessness and Poverty, *Photo Identification Barriers Faced by Homeless Persons: The Impact of September 11* (Washington, D.C.: 2004); and Wiehl, "Reliance on Identification."

[16]Kushel and Moore et al., *Toward a New Understanding*.

[17]This fee is for an original driver's license (not a renewal) for someone 21 or older as of August 2023. Expiration periods for original driver's licenses ranged from 4 to 8 years. Some states may charge extra fees for REAL ID–compliant driver's licenses.

essentials, such as food, over ID, according to one study and two homeless advocacy groups we spoke with.[18]

Requirements for proof of identity. People generally need to provide proof of identity to obtain ID or supporting documents. For example, to replace a Social Security card, individuals must present evidence of identity. While the Social Security Administration may accept several types of documents to fulfill this requirement—including a driver's license and school records—providing any type of identifying document may be difficult for people experiencing homelessness who have lost their belongings. People experiencing homelessness can find themselves in a situation where they cannot obtain ID because they lack supporting documents, and they cannot obtain these supporting documents because they do not have ID.[19]

Technology. Applying for ID or supporting documents can involve accessing technology.[20] For example, officials from the Massachusetts Registry of Motor Vehicles told us they prefer certain forms to be completed online in advance of a service center visit. Further, scheduling the appointments to obtain an ID or supporting documents is often done online. Even if they have access to technology, some people experiencing homelessness may not have the technological literacy to use online services, according to two studies and a homelessness assistance provider and a homeless advocacy group we interviewed.[21]

Transportation. People experiencing homelessness may have difficulty securing transportation to attend appointments at the department of motor

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[18]Chris Sanders et al., "'You Need ID to Get ID': A Scoping Review of Personal Identification as a Barrier to and Facilitator of the Social Determinants of Health in North America," *International Journal of Environmental Research and Public Health*, vol. 17, no. 12 (2020).

[19]Haley Hoff, "Get Real: Implications and Impositions of the Real ID Act of 2005 on Vulnerable Individuals and States," *Catholic University Law Review*, vol. 68, no. 2 (2019); National Law Center on Homelessness and Poverty, *Photo Identification Barriers*; and Wiehl, "Reliance on Identification."

[20]Christina Wusinich et al., "'If You're Gonna Help Me, Help Me': Barriers to Housing among Unsheltered Homeless Adults," *Evaluation and Program Planning*, vol. 76 (2019).

[21]Department of Housing and Urban Development, Office of Policy Development and Research, *Strategies for Improving Homeless People's Access to Mainstream Benefits and Services* (Washington, D.C.: 2010); and Kushel and Moore et al., *Toward a New Understanding*.

vehicles or other offices that provide ID services.[22] This barrier may be more pronounced in rural areas or areas with limited public transportation.[23]

Parental consent for youth experiencing homelessness. For youth experiencing homelessness, the requirement in some states that they receive parental consent to obtain ID can present a barrier. A significant factor in youth homelessness is family conflict, according to two studies, which can create challenges in obtaining the required consent.[24] Further, youth separated from their parents may have difficulty accessing their birth certificate and Social Security card if these documents remain in their parents' possession.[25]

Gender markers for transgender individuals. A 2017 study found that rates of homelessness are higher among lesbian, gay, bisexual, and transgender youth.[26] Transgender individuals in particular may have difficulty obtaining ID because the gender reported on their birth certificate may not match their current gender identity, according to several studies, HHS officials, and a homelessness assistance provider we spoke with.[27]

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[22]Department of Housing and Urban Development, *Strategies for Improving*; and Kushel and Moore et al., *Toward a New Understanding*.

[23]Department of Housing and Urban Development, *Strategies for Improving*; Sanders et al., "You Need ID to Get ID"; Peter P. Swire and Cassandra Q. Butts, *The ID Divide: Addressing the Challenges of Identification and Authentication in American Society* (Washington, D.C.: Center for American Progress, 2008).

[24]Lonnie Embleton et al., "Causes of Child and Youth Homelessness in Developed and Developing Countries: A Systematic Review and Meta-analysis," *JAMA Pediatrics*, vol. 170, no. 5 (2016); and Adrienne L. Fernandes-Alcantara, *Runaway and Homeless Youth: Demographics and Programs*, RL33785 (Washington, D.C.: Congressional Research Service, 2019).

[25]Hannah Hussey, *Expanding ID Card Access for LGBT Homeless Youth* (Washington, D.C.: Center for American Progress, 2015); and Laura Kolb and Jenny Pokempner, "Proving I Exist: Strategies for Assisting Youth in Obtaining Identification Documents," *American Bar Association* (Oct. 2, 2017), accessed January 3, 2022, https://www.americanbar.org/groups/litigation/resources/newsletters/childrens-rights/strategies-assisting-youth-obtaining-identification-documents/.

[26]M.H. Morton, A. Dworsky, and G.M. Samuels, *Missed Opportunities: Youth Homelessness in America, National Estimates* (Chicago, IL: Chapin Hall at the University of Chicago, 2017).

[27]Hussey, *Expanding ID Card Access*; Kolb and Pokempner, "Proving I Exist"; and Sanders et al., "You Need ID to Get ID."

Options to Mitigate Barriers May Expand ID Access, but Some May Increase Fraud Risks

Several options exist to mitigate barriers to obtaining ID for people experiencing homelessness, according to literature we reviewed and interviews we conducted. While these options may expand ID access, some also increase the risk of fraud.

Alternative Addresses

Allowing the use of alternative addresses—shelter addresses or descriptive addresses—may expand ID access for people experiencing homelessness who have difficulty demonstrating a residence.

Most states we reviewed allow people experiencing homelessness to use a shelter address as their residential address when applying for ID. Further, Oregon allows individuals to use a descriptive address of the location where they actually reside, such as "under the west end of Burnside Bridge," when applying for ID.[28] Two studies and representatives from a homeless advocacy group suggested that allowing people experiencing homelessness to use descriptive addresses in lieu of physical addresses could help these individuals overcome ID barriers.[29]

Using alternative addresses to overcome ID barriers has limitations. For example, an individual must have a preexisting relationship with a shelter to use its address, but many people experiencing homelessness are unsheltered. Additionally, shelters often limit length of stay, which can complicate mail delivery, according to officials from the U.S. Interagency Council on Homelessness. Further, use of a shelter's mailing address may add to the shelter's administrative burden, according to an advocate and assistance provider. In addition, while a descriptive address can provide a residence for application purposes, individuals cannot receive mail at this address and may not be able to receive ID sent through the mail (which many states do), according to the American Association of Motor Vehicle Administrators.

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[28]Individuals in Oregon using a descriptive address must also provide a mailing address when applying for ID.

[29]Hussey, *Expanding ID Card Access*; and National Law Center on Homelessness and Poverty, *Photo Identification Barriers*.

Electronic Document Storage

Storing ID or supporting documents electronically may help mitigate against their loss, theft, or destruction, according to a study and three homeless advocacy groups and two homelessness assistance providers we spoke with.[30] Some cities have created digital lockers—secure electronic methods for storing ID and supporting documents—to help people experiencing homelessness maintain copies of their essential documents. Electronic storage may help individuals regain these essential documents should they be lost.[31]

However, electronic document storage has limitations. Many states require ID applicants to submit original copies of supporting documents, according to a study and three advocates, two assistance providers, and one state ID-issuing office we interviewed.[32] Further, storing documents electronically makes them susceptible to data breaches or other exploitation that can lead to identity theft, according to four homeless advocacy groups we spoke with. Some people experiencing homelessness may also have difficulty accessing or operating the technology used to electronically store the documents, according to these groups.

Alternatives to REAL ID Documentation Requirements

States that offer noncompliant ID may allow a wider variety of documentation to demonstrate identity, compared to REAL ID requirements (see text box). Officials from a homeless advocacy group and the American Association of Motor Vehicle Administrators said that use of alternative documentation may therefore expand ID access for people experiencing homelessness. Among the seven states in our review that offered noncompliant ID, examples of commonly accepted types of alternative documentation included military documents, school records, court documents, and expired ID.

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[30]Department of Housing and Urban Development, *Strategies for Improving*.

[31]Kolb and Pokempner, "Proving I Exist"; and Sanders et al., "You Need ID to Get ID."

[32]National Law Center on Homelessness and Poverty, *Photo Identification Barriers*.

Washington State Has an Expansive List of Alternative Documentation

Washington offers its residents the option to obtain a noncompliant ID. To do so, applicants may verify their identity with documentation other than that required to receive a REAL ID. For example, applicants may provide a record of military discharge (Form DD-214), a professional license (e.g., nursing, physician, engineer), a Washington concealed weapons permit, or a school transcript or record with the applicant's date of birth, or other documents (known as "B List" documents), so long as the applicant provides documentation as follows: either (1) one "A List" document, such as an expired driver's license, and two "B List" documents, or (2) four "B List" documents, including one document that establishes name and date of birth. Alternatively, applicants may also provide one "stand alone" document, such as a U.S. passport, or two "A List" documents.

Source: Washington State Department of Licensing. | GAO-24-105435

However, accepting a wider range of documentation to demonstrate identity can increase fraud risks, according to homeless advocacy groups and the American Association of Motor Vehicle Administrators. Further, officials from this association noted that expanding the types of documents accepted requires staff training on authenticating these alternatives. They also told us that allowing a wider set of documents makes verifying the documents more time-consuming.

Reduced Fees

An option to mitigate the cost barrier to obtaining ID would be to offer reduced fees for ID or supporting documents to individuals experiencing homelessness.[33] Five states we interviewed told us they offer reduced-fee ID to people experiencing homelessness (see text box).[34] Additionally, replacement Social Security cards are offered at no cost to all applicants.

Pennsylvania Offers Free ID to Individuals Experiencing Homelessness

In 2020, Pennsylvania passed a law allowing people experiencing homelessness to receive a free initial ID or renewal (duplicate ID fees still apply). To receive this benefit, applicants must apply in person at a Pennsylvania Driver License Center and certify on their ID application that they are homeless, as defined in 42 U.S.C. § 11302, among other things.

Source: Pennsylvania Department of Transportation. | GAO-24-105435

However, the cost of foregoing fees can be significant. For example, officials from the Florida Department of Highway Safety and Motor Vehicles estimated the department had foregone over $900,000 in potential revenues over a 13-month period by providing no-cost IDs to

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[33]Hussey, *Expanding ID Card Access*; and National Law Center on Homelessness and Poverty, *Photo Identification Barriers*.

[34]These states are Florida, Maryland, Oregon, Pennsylvania, and Washington.

applicants experiencing homelessness. The Social Security Administration told us each replacement Social Security card processed by a local field office costs the federal government $61. Further, reducing ID fees for people experiencing homelessness could raise equity concerns and be perceived as favoring one group, according to the American Association of Motor Vehicle Administrators.

Attestation

Allowing attestation in lieu of documentation to verify identity or residence is another option for mitigating barriers to obtaining ID. Under such an option, people who are familiar with someone experiencing homelessness, such as social workers or shelter employees, could sign an affidavit attesting to the individual's identity or residence. Most states we reviewed allow such attestation of residence for people experiencing homelessness (see example in text box). Additionally, for a noncompliant ID, the Oregon Department of Transportation will accept a letter from specific state agencies verifying the identity of an individual.

Massachusetts Allows Shelters to Attest to Individuals' Residence

Massachusetts has established an alternative residency affidavit program. This program assists individuals who are receiving housing services, such as people experiencing homelessness, and who struggle to provide a traditional proof-of-residency document. Under this program, authorized institutions, including homeless shelters, complete affidavits attesting that individuals are receiving housing services in one of their facilities. Once completed and approved by the Registry of Motor Vehicles, this affidavit qualifies as one proof of residence for individuals seeking ID.

Source: Massachusetts Registry of Motor Vehicles. | GAO-24-105435

While attestation can expand ID access, it also introduces the risk of fraud. For example, officials from the Oregon Department of Transportation, which allows for residency attestation, told us they identify residence fraud frequently. Additionally, officials from the American Association of Motor Vehicle Administrators told us that allowing attestation can cast doubt on the integrity of the identification verification process, thereby making state-issued identification less useful.

Biometrics

The increased use of biometric techniques (such as fingerprinting or facial recognition) to verify identity when people experiencing homelessness apply for ID was named by officials from the American Association of Motor Vehicle Administrators and two homeless advocacy groups we interviewed as an option that may expand access to ID. Representatives

from the National Homelessness Law Center told us about a police department that establishes individuals' identities using their fingerprints and then gives them an identity credential that can be used to obtain ID. Officials from three states we interviewed told us they use facial recognition in issuing ID.[35] For example, Washington uses facial recognition to ensure that an applicant does not have ID issued under a different identity.

Although using biometrics may make verifying identity easier, there are limitations. Biometric identification systems can be expensive. For example, officials from the Oregon Department of Transportation told us that it cost approximately $4.6 million to implement a facial recognition system in 2009. Further, fingerprinting is often associated with law enforcement and, according to homeless advocacy groups, many people experiencing homelessness are wary of involvement with law enforcement representatives. Additionally, the use of biometrics raises privacy questions, such as who would maintain and have access to the repository of fingerprints or facial images, as one homeless advocacy group told us. Lastly, we previously reported that facial recognition has higher error rates for certain demographics, potentially resulting in disparate treatment or other adverse consequences for members of these populations.[36]

Intergovernmental Coordination

Additionally, representatives from two homelessness assistance providers and an advocacy group we spoke with identified intergovernmental coordination as a best practice for overcoming barriers. An example of this type of coordination is the Maryland Department of Transportation's Motor Vehicle Administration's partnership with the City of Baltimore. In 2020, the Motor Vehicle Administration worked with the city to hold on-site ID processing events at emergency shelters. At these events, according to officials from the Motor Vehicle Administration, several dozen IDs were issued to help individuals obtain the documentation necessary to move into assisted housing.

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[35]The states are Massachusetts, Oregon, and Washington.

[36]GAO, *Facial Recognition Technology: Privacy and Accuracy Issues Related to Commercial Uses*, GAO-20-522 (Washington, D.C.: July 13, 2020).

Stakeholders Had Mixed Views on the REAL ID Act's Effect on the Homeless Population

Stakeholders had mixed views as to how the implementation of the REAL ID Act has affected people experiencing homelessness. All homeless advocacy groups we interviewed and several studies we reviewed generally agreed that the implementation of the REAL ID Act has made it more difficult for people experiencing homelessness to obtain ID.[37] For example, officials from two advocacy groups noted that the REAL ID Act has limited the types of supporting documents states may accept.

Conversely, most of the state ID-issuing offices we spoke with indicated that the implementation of the REAL ID Act has had no effect on the homeless population's ability to obtain ID. Officials from four states told us this was because their states also offer noncompliant IDs, which have more lenient requirements. Additionally, officials from two states without noncompliant IDs told us that the act has not affected the homeless population because their requirements changed little with the implementation of the act.

HUD, HHS, and VA Homelessness Programs Can Support ID-Related Assistance as Part of Case Management

HUD, HHS, and VA Interpret Regulations as Permitting ID Assistance as Part of Case Management

HUD, HHS, and VA have interpreted their regulations as permitting assistance with obtaining ID documentation as part of case management, which entails connecting individuals to housing, supportive services, or government benefits.

HUD

HUD regulations for the Continuum of Care and Emergency Solutions Grant programs do not specifically mention ID assistance services as an

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[37]Hoff, "Get Real"; Hussey, *Expanding ID Card Access*; Kolb and Pokempner, "Proving I Exist"; Swire and Butts, *The ID Divide*; and Wiehl, "Reliance on Identification."

eligible use of program funds.[38] However, HUD indicated that it has interpreted its regulations as permitting these services for its homelessness assistance programs. HUD considers ID-related assistance as an eligible supportive service that its providers may provide as part of case management if a client needs ID to access housing and government benefits or to obtain life skills to function independently. HUD officials indicated that assistance related to obtaining a REAL ID is likely an allowable expense but did not have documented policy on this as an eligible cost.

HUD has not issued specific guidance on what types of ID assistance services are permitted through the Continuum of Care and Emergency Solutions Grants programs. For HUD's Youth Homelessness Demonstration Program, HUD issues notices of funding opportunity that may specify additional types of services that providers can provide beyond what is specifically permitted under applicable regulations.[39] The notices have specified certain ID-related services in recent years, which we describe later in this report. HUD noted that providers of the three programs can submit questions about whether specific types of ID-related assistance are permitted using a resource called "Ask A Question." For instance, HUD provided us with examples of "Ask A Question" responses it had given for the Continuum of Care and Emergency Solutions Grant programs in which HUD specified that providers can use program funds to pay for ID documentation, such as birth certificates and driver's licenses. According to HUD, the agency receives questions on ID-related assistance every 1 to 3 months. The responses are provided directly to the entity rather than distributed more broadly.

HHS

HHS's grant-authorizing statutes, implementing regulations, and program policies we reviewed do not specifically mention ID assistance services

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[38]24 C.F.R. part 578 (Continuum of Care program) and 24 C.F.R. part 576 (Emergency Solutions Grant Program). In October 2023, HUD noted that it was in the process of drafting regulations that would clarify that ID assistance is an allowable expense under the Emergency Solutions Grant and Continuum of Care programs. However, because the regulations are in draft form, they are subject to change.

[39]For HUD's Youth Homelessness Demonstration Program, providers must administer the award in accordance with certain Continuum of Care program requirements, among other regulatory requirements, and consistent with the applicable notice of funding opportunity.

as a permissible program expense.[40] However, HHS has interpreted certain grant-authorizing statutes and regulations as permitting such services—including those related to obtaining a REAL ID—as part of allowable case management activities intended to help individuals obtain housing, employment, and other benefits and services.

For example, a primary activity of HHS programs related to serious mental illness, substance use disorders, or co-occurring disorders is connecting individuals to the various services and mainstream benefits for which they are eligible. This can involve providing the individuals assistance with obtaining ID documentation, according to HHS officials. Similarly, HHS noted that the authorizing statute for the Runaway and Homeless Youth program directs grant programs to provide services and a plan to help homeless youth transition to independent living or another appropriate living arrangement.[41] According to HHS, this can include assistance with obtaining ID and supporting documentation.

HHS has not issued specific guidance on what types of ID assistance services are permitted through its programs. However, HHS issued a toolkit in February 2022 that provides general information to the public and homelessness assistance providers on how providers can help clients obtain ID-related documentation, including steps and best practices for replacing IDs, the availability of fee waivers, and documentation checklists.[42] HHS also noted that if grant recipients have questions about whether using program funds for ID-related assistance is permitted, they can consult with their federal project officer or other federal contact for guidance.

For HHS programs related to serious mental illness, substance use disorders, or co-occurring disorders, the agency noted that grantees are

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[40]See, for example, 34 U.S.C. § 11201 et seq. and associated implementing regulations at 45 C.F.R. part 1351 (Runaway and Homeless Youth Program); 42 U.S.C. § 290bb–32 (Treatment for Individuals with Serious Mental Illness, Serious Emotional Disturbance, or Co-Occurring Disorders Experiencing Homelessness program); 42 U.S.C. § 290aa-5 (Grants for the Benefit of Homeless Individuals); Stewart B. McKinney Homeless Assistance Amendments Act of 1990, Pub. L. No. 101-645, 104 Stat. 4673, 4726 (1990), codified at 42 U.S.C. § 290cc-21 et seq., and reauthorized by Section 9004 of the 21st Century Cures Act (Pub. L. No. 114-255, 130 Stat. 1033, 1238 (2016)), and implemented by 42 C.F.R. part 54 (Projects for Assistance in Transition from Homelessness program).

[41]34 U.S.C. § 11222(a)(2), (a)(6).

[42]Department of Health and Human Services, Substance Abuse and Mental Health Services Administration, Homeless & Housing Resource Center, *Helping Individuals Experiencing Homelessness Obtain Identification* (Rockville, MD: Feb. 2022).

permitted to develop their own programmatic approaches to providing ID-related assistance (e.g., through direct services or in partnership with local providers). HHS also noted that if a provider has identified a novel and permissible approach to ID-related assistance, HHS would share this information with other grant recipients.[43]

In response to questions we asked about barriers to obtaining ID, what federal agencies can do to mitigate these barriers, and the program guidance agencies issue, most of the providers we interviewed did not specify the need for additional guidance or funding for ID-related assistance specifically. Three of 11 providers we interviewed stated that more specific guidance on the types of ID-related assistance permitted would be helpful. One provider noted that organizations might be reluctant to use program funds for ID-related assistance services if they are not enumerated in the program policies and guidance. Three of 11 providers said they believed that dedicated or additional funding for ID services would be helpful.

VA

Under VA's Supportive Services for Veteran Families program, ID-related assistance, including assistance related to obtaining a REAL-ID, is permissible if such documentation is necessary to secure permanent housing or supportive services, according to agency officials. VA noted that property management or landlords can require a state-issued ID in addition to other personal information and, therefore, helping individuals obtain ID also helps them secure housing. VA's program guide for Supportive Services for Veteran Families specifies certain allowable uses of funds related to ID assistance as long as an ID is needed to help individuals maintain housing stability. These guidelines are based on VA's interpretation of its program regulations, according to VA officials.[44] If grantees have questions about the specific types of ID services permitted

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[43]HHS uses the eRA Grants Management Correspondence System to communicate with grantees of the Treatment for Individuals Experiencing Homelessness and Grants for the Benefit of Homeless Individuals programs. HHS noted that for the Projects for Assistance in Transition from Homelessness program specifically, the agency could share information on novel approaches to ID-related assistance through emails to all state program contacts or at monthly state contact network meetings.

[44]According to VA, under 38 C.F.R § 62.33(g), grantees are strongly encouraged to provide legal services to assist participants with issues that interfere with participants' ability to obtain or retain permanent housing or supportive services. One common issue faced by homeless or at-risk veterans is driver's license reinstatement.

using program funding, VA officials said grantees can submit questions to the regional coordinator or program office.

HUD, HHS, and VA Programs Support Different Types of ID-Related Assistance

The types of ID-related assistance permitted by the HUD, HHS, and VA homelessness assistance programs we reviewed can vary and may include the following services, according to agency officials.[45]

- **Assistance navigating the process for obtaining ID.** Homelessness assistance providers can use program funds to help individuals navigate the process of applying for state-issued IDs and other ID-related documents, according to agency officials. This assistance can involve using staff resources to help individuals determine how they can obtain ID documentation, facilitating the process for obtaining these items, and connecting individuals to ID-related resources. For example, providers of VA's Supportive Services for Veteran Families program can use program funds to connect individuals to legal services to help them reinstate suspended or revoked driver's licenses. According to HUD, all three HUD programs we reviewed permit the use of program funds to connect unhoused or unstably housed individuals with service providers that can provide a mailing address.

- **Financial assistance.** Program funds can provide financial assistance associated with obtaining identification documents, according to agency officials. For example, according to HHS, Runaway and Homeless Youth program providers can use funds to pay fees to help youth obtain state-issued IDs and supporting documentation. Providers participating in VA's Supportive Services for Veteran Families can use program funds to pay for legal

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[45]We reviewed eight federal grant programs that fund direct assistance and case management to individuals experiencing homelessness, and that HUD, HHS, and VA identified as supporting ID-related assistance. These programs include three from HUD (the Continuum of Care, Emergency Solutions Grants, and Youth Homelessness Demonstration programs); four from HHS (the Runaway and Homeless Youth, Grants for the Benefit of Homeless Individuals, Projects for Assistance in Transition from Homelessness, and Treatment for Individuals Experiencing Homelessness programs); and one from VA (Supportive Services for Veteran Families). The Department of Justice also operates grant programs that may provide ID-related assistance to people experiencing homelessness, such as the Second Chance Act and Transitional Housing Assistance Grants for Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking. However, we did not include these programs in our review because they are not targeted to the homeless population.

representation needed to obtain an ID. They can also pay fees associated with obtaining Social Security cards and birth certificates related to a participant's ability to secure employment or permanent housing.[46] Since 2019, HUD's Youth Homelessness Demonstration Program has allowed providers to use program funds to pay clients' past driving fines and fees that prevent them from obtaining or renewing their driver's license, if lacking a driver's license affects their ability to obtain or maintain housing.

- **Transportation.** All three agencies indicated that providers can use program funds to help arrange transportation to ID-issuing offices or related services. For example, under HHS's Projects for Assistance in Transition from Homelessness, HHS officials indicated that homelessness assistance providers can use program funds to pay clients' bus fare to a division of motor vehicles office to obtain an ID. VA's Supportive Services for Veteran Families also can fund bus or train passes, the direct provision of transportation, or minor vehicle repairs if such assistance is needed to obtain an ID, according to agency officials.

See text box for examples of providers' use of federal funds for ID-related services.

Examples of ID Assistance Services Offered by Federal Homelessness Assistance Providers

Some homelessness assistance providers we interviewed shared examples of using federal program funds for ID-related services:

- A Runaway and Homeless Youth program provider helped clients obtain Social Security cards and birth certificates by arranging transportation and accompanying them to ID-issuing offices. This provider also provides financial assistance to help clients obtain birth certificates, and clients can use the organization's address as their own address for ID-related purposes.
- One Continuum of Care provider drafts a letter of identification for its clients to establish their identity. It also works with community kitchens, faith-based organizations, and high schools to help clients document their identity.
- Another Continuum of Care provider noted that some of its providers work with departments of motor vehicles to set aside specific appointment times for individuals experiencing homelessness to obtain an ID.

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[46]The Supportive Services for Veteran Families program authorizes grantees to provide up to a maximum of $1,800 per participant household during any 2-year period in General Housing Stability Assistance. This type of assistance refers to the provision of goods or payment of expenses to support a participant's housing stability. All such expenses must relate to a participant's ability to gain or keep employment or their ability to secure or move into permanent housing. These expenses must be paid directly to a third party (not to a participant).

HUD, HHS, and VA indicated they did not track the use of program funds for ID-related services, as providers receiving these funds are not required to report this information. HHS noted it tracks outcomes—such as the number of Runaway and Homeless Youth program clients receiving housing—rather than individual services. VA indicated that establishing reporting requirements related to ID assistance would be an administrative burden and would require approval from the Office of Management and Budget. HUD noted that it had looked into tracking the specific case management services offered by providers, but the variation in type of services was too great to capture them at the federal level. However, HUD staff said individual providers may track ID-related services they offer for their own purposes (e.g., the number of bus tokens distributed to clients).

Most homelessness assistance providers told us that, in addition to using federal funds, they assist individuals with obtaining an ID by leveraging funding from other sources, such as state and local governments and philanthropies.[47] For example, a Continuum of Care grantee noted that philanthropic funds paid for a provider's van, which takes individuals to the local department of motor vehicles once a week. One Runaway and Homeless Youth provider said it obtains vouchers from a local nonprofit organization to cover the cost of obtaining state IDs for its clients. This provider also noted that it expected to use a variety of funding sources to assist individuals experiencing homelessness. HUD has also encouraged Continuum of Care and Emergency Solutions Grants providers to use other sources of funding for ID services before turning to program funds.

In some cases, homelessness assistance providers also stated that their federal program grant funds only indirectly supported ID-related assistance. For example, one provider said its federal grant money primarily funded staff wages, which supports the organization's overall activities, including ID assistance. Another provider indicated that its federal grant money funded general transportation that was not specific to but could cover ID-related assistance.

[47]We interviewed 11 homelessness assistance providers across four of the programs we reviewed—HUD's Continuum of Care (four providers) and HHS's Runaway and Homeless Youth (three providers), Projects for Assistance in Transition from Homelessness (three providers), and Grants for the Benefit of Homeless Individuals (one provider)—about the ID-related assistance they provided.

Homelessness Assistance Providers Can Help Clients Meet ID-Related Requirements When Applying for HUD Housing Programs

HUD's Rental Assistance Programs Have ID-Related Requirements

HUD requires applicants for its Housing Choice Voucher, Public Housing, and Project-Based Rental Assistance programs to provide ID-related documentation to determine eligibility for its programs.[48]

- **Social Security number.** HUD regulations require applicants and all members of an applicant's household to disclose and provide documentation of their Social Security numbers, with certain exceptions, as a condition of admission and continued assistance.[49] Therefore, public housing agencies (PHA) and property owners must generally verify applicants' Social Security numbers prior to admitting individuals or families into HUD rental assistance programs.[50]

- **Evidence of lawful status.** HUD regulations require each eligible family member (or in the case of a child, the adult resident responsible for the child) to sign a declaration of citizenship or eligible immigration status. The regulations also require eligible noncitizens to provide supporting documentation.[51] Eligibility for federal rental assistance is limited to U.S. citizens and noncitizens who have eligible immigration

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[48]We use the phrase ID-related documentation to refer to documents that may be used to verify an aspect of someone's identity. Such documents are not necessarily photo IDs.

[49]24 C.F.R. § 5.216.

[50]PHAs and property owners must accept a range of documents for verifying Social Security numbers, including an original Social Security card or an original document issued by a federal or state government agency that contains the name and Social Security number, along with other identifying information, of the individual (unemployment insurance printout, welfare or Medicaid documents, etc.), consistent with 24 C.F.R. § 5.216(g).

[51]24 C.F.R. § 5.659(b)(1), 24 C.F.R. § 5.508(b), (c). The documents that PHAs and property owners can accept to verify immigration status vary based on categories of eligible immigration status and may include, for example, an applicant's permanent resident card or a final court decision granting asylum, consistent with HUD guidance. PHAs and property owners are permitted, but not required, to adopt policies requiring additional documentation to verify U.S. citizenship. 24 C.F.R. § 5.508(b)(1), 24 C.F.R. § 5.659(b)(1).

status.[52] With some exceptions, PHAs and property owners must verify applicants' evidence of citizenship or eligible immigration status prior to admitting individuals or families into HUD rental assistance programs.

- **Proof of age.** While proof of age or date of birth is not an explicit regulatory requirement for rental assistance eligibility, HUD requires it to administer its programs, according to agency officials. For example, PHAs and property owners may need to obtain documentation of age and verify it for several reasons, such as determining eligibility for a property designated for elderly persons, whether a person is old enough to sign a legally binding contract, or eligibility for rental assistance allowances based on the number of elderly or minor family members.

- **Identity.** Proof of identity is not an explicit regulatory requirement for rental assistance eligibility, but PHAs and property owners may require it to administer their programs. According to HUD, PHAs are required to include family members' names (identity) on HUD reporting forms. Additionally, PHAs and property owners may require proof of legal identity to conduct required background checks and ensure that the information obtained and submitted to third parties is accurate.[53]

Homelessness Assistance Providers Help HUD Housing Applicants Overcome ID-Related Barriers, According to Stakeholders

Because HUD's rental assistance programs may require ID and supporting documents, the barriers individuals experiencing homelessness face in obtaining ID may also hinder them from accessing rental assistance. Rental assistance applicants experiencing homelessness are generally able to overcome ID-related barriers with the

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[52]42 U.S.C § 1436a, 24 C.F.R. §§ 5.500(a), 5.506(a).

[53]To comply with regulatory requirements, PHAs—on their own behalf or on behalf of property owners—must perform background checks to determine whether a member of a household applying for program admission is subject to the lifetime sex offender registration requirement under a state sex offender registration program. 24 C.F.R. § 5.905(a), (b). Additionally, PHAs, on their own behalf or the behalf of property owners, are authorized to obtain criminal conviction records from law enforcement agencies to screen applicants' admission to covered programs and for lease enforcement or eviction purposes, but are not required to do so. 24 C.F.R. § 5.903.

help of homelessness assistance providers, according to PHAs.[54] As a result, applicants on waiting lists are likely to have the required ID and supporting documents by the time the PHA or property owner assesses their eligibility.

Most applicants experiencing homelessness apply for rental assistance with the help of a case manager, according to the nine PHAs we interviewed. Four homelessness assistance providers we interviewed—all of which directly assist the homeless population—said they prioritize obtaining ID documents because applicants generally cannot receive rental assistance without them.

HUD does not provide direct ID-related assistance through its housing programs. PHAs generally refer applicants in need of such assistance to local homelessness assistance providers, according to PHAs. PHAs may use their administrative funds for liaison positions to assist the homeless population, according to HUD officials. However, none of the PHAs we interviewed indicated that they provide specific services to assist people experiencing homelessness.

Lack of ID-related documentation generally does not result in denial of rental assistance, according to all nine PHAs and most homelessness assistance providers we interviewed. In some cases, it may delay such assistance. Officials from one PHA said that applicants maintain their position on the waiting list while they work to obtain the required documentation. However, one provider noted a few instances in which applicants were not able to obtain the required ID-related documentation during a PHA's open application period.[55] In these instances, the applicants were denied assistance and would have needed to reapply during the next open period.

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[54]As previously discussed, PHAs administer HUD's Housing Choice Voucher and Public Housing programs. We interviewed nine PHAs and 11 homelessness assistance providers. We did not interview property owners that administer HUD's Project-Based Rental Assistance program. However, since the ID-related program requirements are the same for the Housing Choice Voucher, Public Housing, and Project-Based Rental Assistance programs, the barriers for people experiencing homelessness may be similar across these programs.

[55]According to HUD guidance, and consistent with 24 C.F.R. § 960.206, PHAs have flexibility in how they administer their waiting lists. PHAs may keep the waiting list open indefinitely or open the waiting list periodically for defined application periods.

Documentation Extensions and HUD Policy Changes Provide ID-Related Flexibilities

Regulations for the Housing Choice Voucher, Public Housing, and the Project-Based Rental Assistance programs allow PHAs and property owners to permit otherwise-eligible applicants to remain on the waiting list until they can provide requisite documentation to verify the Social Security number of each household member.[56] In addition, regulations require PHAs and property owners to grant eligibility determination extensions for immigration status documentation if certain conditions are met.[57]

HUD has also implemented policy changes that provide flexibilities for applicants—particularly those experiencing homelessness—who face challenges meeting these documentation requirements.

- **Waivers for targeted voucher programs.** HUD has waived ID-related documentation requirements for the Emergency Housing

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[56]24 C.F.R. § 5.216(h).

[57]For immigration status documentation, a PHA or property owner must provide an extension of 30 days or less if the applicant or family member (a) submits the required declaration certifying that any person for whom required evidence has not been submitted is a noncitizen with eligible immigration status, and (b) certifies that the evidence needed to support a claim of eligible immigration status is temporarily unavailable, additional time is needed to obtain and submit the evidence, and prompt and diligent efforts will be undertaken to obtain the evidence. If the applicant fails to submit required evidence of eligible immigration status within the specified time period or if the submission is insufficient, the PHA or property owner must deny assistance or take other action consistent with the regulation. 24 C.F.R. § 5.508(h).

Voucher program[58] and the Stability Voucher program.[59] These programs specifically target individuals and families who are experiencing homelessness or are at risk of homelessness. HUD has waived the requirement to obtain and verify Social Security number documentation and documentation of eligible noncitizen status before admitting families to the program. Instead, applicants are required to provide this documentation within 180 days of admission to be eligible for continued assistance.[60]

- **Self-certification of Social Security number.** In September 2023, HUD issued a notice that adjusts what it considers acceptable documentation to satisfy the Social Security number disclosure requirements to make it easier for applicants to access programs when their Social Security card or other documentation is inaccessible.[61] This change allows PHAs and property owners to accept self-certification of an applicant's Social Security number, in conjunction with a third-party document with the applicant's name

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[58]Authorized by the American Rescue Plan Act of 2021, Pub. L. No. 117-2, § 3202, 135 Stat. 4, 58, the Emergency Housing Voucher program—in collaboration with PHAs, local Continuums of Care, and victim service providers—makes housing choice vouchers available to individuals and families who are homeless; at risk of homelessness; fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; or recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability. A PHA may continue to issue Emergency Housing Vouchers to eligible households until it leases all of its cumulative Emergency Housing Voucher allocation or it is directed by HUD to stop issuing them.

[59]As authorized by the Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, § 103, 134 Stat. 1182, 2166 (2021), the Stability Voucher program makes housing choice voucher assistance available to PHAs in partnership with local Continuums of Care and victim service providers to assist households experiencing or at risk of homelessness; those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; and veterans and families that include a veteran family member that meets one of the preceding criteria. The Consolidated Appropriations Act, 2022, Pub. L. No. 117-103, § 239, 136 Stat. 49, 765-766 (2022), authorized HUD to waive certain requirements necessary to administer the Stability Voucher program.

[60]Using its authority under the CARES Act, in April 2020, HUD issued a similar but temporary waiver for its Housing Choice Voucher and Public Housing programs, among others. Individuals admitted to the programs under this waiver had to provide Social Security number documentation and documentation demonstrating eligible noncitizen status within 90 days of admission to be eligible for continued assistance. The waiver expired in December 2021.

[61]For purposes of this report, "Social Security number disclosure requirement(s)" means the acceptable documentation of a Social Security number under 24 C.F.R § 5.216(g)(1).

printed on it, to satisfy the disclosure requirement.[62] This self-certification option applies to HUD's Housing Choice Voucher, Public Housing, and the Project-Based Rental Assistance programs, among others.

In its policy notices, HUD acknowledges that ID-related documentation may be difficult to obtain for individuals and families experiencing homelessness and states that these flexibilities make it easier for applicants to access rental assistance programs more quickly. Some homelessness assistance providers we interviewed indicated that these types of flexibilities can help mitigate barriers to obtaining rental assistance.

Agency Comments

We provided HHS, HUD, VA, DHS, the Department of Justice, the Social Security Administration, and the U.S. Interagency Council on Homelessness a draft of this report for their review and comment.

HHS, HUD, DHS, the Department of Justice, and the U.S. Interagency Council on Homelessness provided technical comments, which we incorporated as appropriate. VA and the Social Security Administration did not have comments on the draft report.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Health and Human Services, Secretary of Housing and Urban Development, Secretary of Veterans Affairs, Secretary of Homeland Security, Attorney General, Commissioner of the Social Security Administration, Executive Director of the U.S. Interagency Council on Homelessness, and other interested parties. In addition, the

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[62]Department of Housing and Urban Development, *PIH Notice 2023-27: Implementation Guidance: Sections 102 and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA)* (Washington, D.C.: Sept. 29, 2023). HUD's Enterprise Income Verification system uses data from the Social Security Administration to verify that each household member's reported name, date of birth, and Social Security number match. This process can take up to a few months, according to HUD officials. If the tenant's Social Security number is verified, then no further verification is required. If the tenant's information does not match, then the PHA or property owner must obtain a valid Social Security card issued by the Social Security Administration or an original document issued by a federal or state government agency that contains the name and Social Security number of the individual, along with other identifying information. The PHA or property owner must terminate the tenant's assistance if the tenant fails to provide the required documentation.

report is available at no charge on the GAO website at
https://www.gao.gov.

If you or your staff have any questions about this report, please contact me at 202-512-8678 or CackleyA@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix II.

Alicia Puente Cackley
Director, Financial Markets and Community Investment

List of Committees

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Committee on Appropriations
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U.S. House of Representatives

The Honorable Tom Cole
Chair
The Honorable Mike Quigley
Ranking Member
Subcommittee on Transportation, Housing
  and Urban Development, and Related Agencies
Committee on Appropriations
U.S. House of Representatives

Appendix I: Objectives, Scope, and Methodology

This report examines (1) barriers people experiencing homelessness may encounter in obtaining an ID and options to mitigate those barriers, (2) federal homelessness assistance programs that support ID assistance services, and (3) the ID requirements for the Department of Housing and Urban Development's (HUD) rental assistance programs and the homeless population's ability to meet these requirements.

Document Review

To describe barriers people experiencing homelessness may encounter in obtaining an ID and options to mitigate them, we reviewed research from several sources, including academic, government, advocacy group, and think-tank publications. To identify relevant research for review, we performed two database searches. The first search focused on research specifically related to homelessness and REAL ID. The second search focused on research published since 2005 related to homelessness and ID more generally. For each search, we reviewed databases such as EBSCOhost, ProQuest, and Scopus. In addition, we asked officials from federal agencies we spoke with (described below) to recommend publications related to homelessness and ID. From these two methods, we identified 10 relevant publications.

To examine ID assistance services supported by federal programs and ID requirements for HUD rental assistance programs, we reviewed applicable federal laws. These included the statutes authorizing the Department of Health and Human Services' (HHS) homelessness assistance programs and HUD's rental assistance programs. We also reviewed applicable regulations, such as those that determine permissible program expenses for HHS homelessness assistance programs and eligibility for HUD rental assistance programs. Additionally, we reviewed relevant agency policies and guidance, such as the notices of funding opportunity for HHS's homelessness assistance programs and notices related to HUD's rental assistance programs.

Data Collection Instrument

To obtain information on homelessness assistance programs and rental assistance programs, we submitted standardized data collection instruments to HHS, HUD, and the Department of Veterans Affairs (VA) for the agencies to complete. To determine the programs covered in these instruments, we asked each agency to identify its homelessness assistance programs that provide funding that supports direct ID assistance services, and we asked HUD to identify its rental assistance programs that provided more than $10 million in direct rental assistance in fiscal year 2022, the most recent year available at the time of our review. The agencies identified eight homelessness assistance programs (four HHS programs, three HUD programs, and one VA program),[1] and HUD identified seven rental assistance programs.[2] We submitted data collection instruments to program officials and reviewed the responses. To assess the clarity and relevance of the data collection instrument questions, we pretested the instrument with HUD and HHS. These instruments asked the agencies questions about ID and their programs, including the types of ID assistance supported by the programs (for homelessness assistance programs) and extent to which ID was required to participate in the programs (for rental assistance programs).

Interviews

To address all three objectives, we interviewed officials from the following federal agencies: HHS, HUD, VA, Department of Homeland Security,

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[1]The three HUD programs are the Continuum of Care, Emergency Solutions Grants, and Youth Homelessness Demonstration programs. The four HHS programs are the Runaway and Homeless Youth; Grants for the Benefit of Homeless Individuals; Projects for Assistance in Transition from Homelessness; and Treatment for Individuals Experiencing Homelessness programs. The VA program is the Supportive Services for Veteran Families program. The Department of Justice also operates grant programs that may provide ID-related assistance to people experiencing homelessness, such as the Second Chance Act, and Transitional Housing Assistance Grants for Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking. However, we did not include these programs in our review because they are not targeted to the homeless population.

[2]The programs are the Family Unification; Mainstream Vouchers; Public Housing; Section 8 Housing Choice Voucher; Section 8 Project-Based Rental Assistance; Section 202 Supportive Housing for the Elderly; and Section 811 Supportive Housing for Persons with Disabilities programs. Ultimately, we limited our review of rental assistance programs to the three largest in terms of dollars appropriated in fiscal year 2022: the Public Housing, Section 8 Housing Choice Voucher, and Section 8 Project-Based Rental Assistance programs.

Department of Justice, Social Security Administration, and U.S.
Interagency Council on Homelessness. We also interviewed
representatives from three industry associations: American Association of
Motor Vehicle Administrators; Council of Large Public Housing
Authorities; and Public Housing Authorities Directors Association.

In addition, we interviewed representatives of five homeless advocacy
groups: the National Alliance to End Homelessness; National Coalition for
the Homeless; National Coalition for Homeless Veterans; National
Homelessness Law Center; and National Network for Youth. Additionally,
we interviewed representatives of nongeneralizable selections of state ID-
issuing agencies, homelessness assistance providers, and public housing
agencies (PHA), as discussed below.

State Selection

We chose a nongeneralizable selection of 10 states to inform our work for
all three objectives. The states we selected were California, Florida,
Maryland, Massachusetts, New York, Ohio, Oregon, Pennsylvania,
Texas, and Washington.

To select these states, we first identified those states that had the 10
largest homeless populations, according to HUD's 2019 point-in-time
estimates.[3] Next, in our literature reviews and interviews with homeless
advocacy groups, we identified states mentioned as having strategies for
mitigating barriers to obtaining ID faced by people experiencing
homelessness. We selected 10 states that appeared in at least two of
these three categories (i.e., largest homeless population, mitigating
strategies identified in literature, and mitigating strategies identified in
interviews) and that, when taken collectively, covered all four Census
Bureau regions.[4]

We attempted to interview the ID-issuing offices in each of the 10
selected states. Ultimately, we interviewed officials from eight of these 10

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[3]HUD requires Continuums of Care to count sheltered individuals (those in emergency
shelters, transitional housing programs, or safe haven projects) annually and to count
unsheltered individuals (those on the street or in other places not suitable for human
habitation) at least every 2 years. We chose to use data from the 2019 point-in-time count
because they were the most recently available complete data (the unsheltered counts are
required in odd-numbered years, and the 2021 count was disrupted by the COVID-19
pandemic).

[4]The regions are Northeast, South, Midwest, and West.

state ID-issuing offices about the ways in which individuals experiencing
homelessness can demonstrate their identity or residence and about
barriers to obtaining ID for the homeless population.[5]

Homelessness Assistance Provider Selection

To obtain information on federal homelessness assistance programs, the
types of services supported, and the ability of the homeless population to
meet ID requirements for HUD's rental assistance programs, we selected
a nongeneralizable sample of 12 federal homelessness assistance
providers to represent a mix of programs and sizes of populations served,
to reflect both urban and nonurban areas, and because they were located
in one of our 10 selected states.[6] Additionally, we selected providers that
federal agencies identified as offering ID services.

Our final selection consisted of four providers for HHS's Projects for
Assistance in Transition from Homelessness program (located in Florida,
Louisiana, Maryland, and Pennsylvania); one provider for HHS's Grants
for the Benefit of Homeless Individuals program (located in Iowa); four
providers for HUD's Continuum of Care program (located in California,
Ohio, New York, and Texas); and three providers for HHS's Runaway and
Homeless Youth program (located in Massachusetts, Oregon, and
Washington). We interviewed staff of 11 of the 12 selected homelessness
assistance providers.

PHA Selection

To obtain information on ID requirements for HUD's rental assistance
programs and the ability of the homeless population to meet these
requirements, we selected a nongeneralizable sample of 10 PHAs—one
from each of the states in our review—that administered both HUD's

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[5]One state declined to speak with us, and the other did not respond to our efforts to
schedule a meeting.

[6]In this report, homelessness assistance providers refer to grantees of federal
homelessness assistance programs that provide direct services to individuals, and
grantees that distribute the grant funds to other organizations to carry out direct services.

Housing Choice Voucher and Public Housing programs.[7] We chose PHAs to incorporate a range of sizes and locations. We ensured our selection included a mix of sizes as measured by the number of units managed by the PHA.[8] Further, we ensured our selection of PHAs represented different geographic regions for each size category.[9] We selected large PHAs in California, Florida, Massachusetts, and Ohio; medium PHAs in Maryland, New York, and Oregon; and small PHAs in Pennsylvania, Texas, and Washington.

We attempted to interview all 10 PHAs. Ultimately, we interviewed officials from nine of these 10 PHAs about their ID requirements for applicants and the ability of the homeless population to meet these requirements.[10]

We conducted this performance audit from September 2021 to February 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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[7]We did not interview property owners that administer HUD's Project-Based Rental Assistance program. We determined that since the ID-related program requirements are the same for the Housing Choice Voucher, Public Housing, and Project-Based Rental Assistance programs, the information obtained from PHAs would be sufficient for the purpose of describing ID requirements for HUD rental assistance programs and the ability of the homeless population to meet these requirements.

[8]We defined three size categories for PHAs. Large PHAs managed 5,000 or more units, medium PHAs managed 1,000 to 4,999 units, and small PHAs managed less than 1,000 units.

[9]We used the geographic regions as defined by the Census Bureau.

[10]We reached out to 10 PHAs, but one PHA did not respond to our attempts to schedule a meeting. The remaining nine PHAs we interviewed provided a sufficient mix of geographic locations and sizes.

Appendix II: GAO Contact and Staff Acknowledgments

GAO Contact

Alicia Puente Cackley, (202) 512-8678 or CackleyA@gao.gov

Staff Acknowledgments

In addition to the contact above, Andrew Pauline (Assistant Director), Brandon Jones (Analyst-in-Charge), Christopher Lee (Analyst-in-Charge), Meghana Acharya, Jessie Biltz, Lauren Capitini, Sarah Garcia, Jill Lacey, Charlene Lindsay, and Jennifer Schwartz made key contributions to this report.

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