



December 2022

# BUREAU OF PRISONS

## Opportunities Exist to Better Assist Incarcerated People with Obtaining ID Documents Prior to Release

Accessible Version

# GAO Highlights

Highlights of [GAO-23-105302](#), a report to congressional requesters

## Why GAO Did This Study

Nearly 550,000 people were released from federal and state prisons in 2020. These people may face challenges reentering society—such as obtaining housing and employment—that may require ID documents to address. BOP, which is responsible for about 140,000 federally incarcerated people, is required to help these people obtain ID documents before release.

GAO was asked to report on BOP's processes to help incarcerated people obtain ID documents, and the number of those people. This report addresses (1) BOP's process to assist people, (2) the extent to which people are released from BOP facilities with ID documents, and (3) selected states' processes for assisting people.

GAO reviewed legislation and BOP and state policies and analyzed BOP data related to its efforts to assist people in obtaining ID documents. GAO also conducted non-generalizable interviews with officials from five BOP facilities and other offices, selected based on location and facility security levels, and eight formerly incarcerated people, selected by working with an advocacy organization. GAO also interviewed agency officials from a non-generalizable sample of six states that were selected based, in part, on their use of a variety of approaches.

## What GAO Recommends

GAO is making five recommendations, including that BOP leverage stakeholder input in developing a new ID card and take various steps to enhance its data collection and analysis efforts to better assist incarcerated people. BOP concurred with our recommendations.

View [GAO-23-105302](#). For more information, contact Gretta L. Goodwin at (202) 512-8777 or [Goodwin@gao.gov](mailto:Goodwin@gao.gov).

December 2022

## BUREAU OF PRISONS

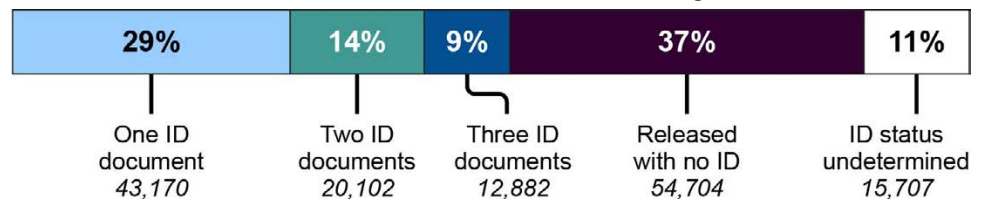
# Opportunities Exist to Better Assist Incarcerated People with Obtaining ID Documents Prior to Release

## What GAO Found

The Federal Bureau of Prisons (BOP) has a process to assist federally incarcerated people with obtaining identification (ID) documents before their release. These include Social Security cards, birth certificates, and state-issued photo IDs (e.g. a driver's license). However, BOP officials noted that there are a number of inherent challenges in assisting people with getting IDs. For example, people may not be able to pay fees for an ID document, or may not be interested in obtaining them. BOP officials stated that the agency is developing a new federal ID card for incarcerated people, which they may be able to exchange for a state-issued photo ID upon release. While BOP has begun outreach to state motor vehicle departments about this new ID card, it has not identified or leveraged input from other stakeholders, such as public assistance providers or state health agencies, which could potentially accept the new ID card. By doing so, BOP could be better positioned to maximize people's use of the ID card.

BOP data show that about half the people released from 2018 through 2021 had at least one ID document in their possession when they left the BOP facility, which exceeds BOP's stated goal of 45 percent. Of those people released with ID documents, most had one ID, as shown below. Of the three ID documents, BOP released the highest percentage of people with Social Security cards.

**Percentage and Number of People Released from Federal Bureau of Prisons (BOP) Facilities with ID Documents in Their Possession, Calendar Years 2018 through 2021**



Source: GAO analysis of BOP data. | [GAO-23-105302](#)

**Accessible Data for Percentage and Number of People Released from Federal Bureau of Prisons (BOP) Facilities with ID Documents in Their Possession, Calendar Years 2018 through 2021**

Category	Number	Percentage
One ID document	43,170	29
Two ID documents	20,102	14
Three ID documents	12,882	9
Released with no ID	54,704	37
ID status undetermined	15,707	11

BOP does not collect complete or consistent data on people's ID document status. For example, though its data system includes a data field to record the ID documents that a person possesses, it does not require all staff to consistently use this data field. BOP also has not assessed if it could collect better data and does not analyze data it does collect. Without requiring the collection of complete and consistent data, or analyzing such data, BOP may lack full information of the

people in their custody who do not have ID documents or why they lack these documents. Having this greater understanding could allow BOP to better target its efforts in ID document assistance, thus providing more people with a chance at successful reentry.

The selected states—Colorado, Florida, Ohio, Minnesota, Montana and Virginia—used various approaches to assist incarcerated people in their states' prisons with obtaining ID documents. For example, some states provide mobile licensing services, have a motor vehicle office embedded at a correctional facility or have correctional staff trained to process photo IDs, or issue an ID at the correctional facility that people can exchange for a state-issued photo ID.

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### **Abbreviations**

BMV	Ohio Bureau of Motor Vehicles
BOP	Bureau of Prisons
DMV	Department of Motor Vehicles
DOC	Department of Corrections
DOJ	Department of Justice
DVS	Minnesota Driver and Vehicle Services
FDC	Florida Department of Corrections
FLHSMV	Florida Department of Highway Safety and Motor Vehicles
ID	identification
MOU	memorandum of understanding
MVD	Montana Motor Vehicle Division
ODRC	Ohio Department of Rehabilitation and Correction
RRC	Residential Reentry Centers
SSA	Social Security Administration

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December 8, 2022

The Honorable Carolyn B. Maloney  
Chairwoman  
Committee on Oversight and Reform  
House of Representatives

The Honorable Mark Takano  
House of Representatives

Nearly 550,000 people were released from state and federal prisons in the U.S. in 2020 after serving their sentences, according to the Bureau of Justice Statistics.<sup>1</sup> These people may face challenges re-entering society, such as finding housing and obtaining employment, many of which require valid identification (ID) documents. ID documents are crucial to successful reentry into society for people released from prison. According to research and reentry organizations, housing and employment—two important components of successful reentry—are nearly impossible to obtain without ID documents.<sup>2</sup>

The Federal Bureau of Prisons (BOP), a component within the Department of Justice (DOJ), is responsible for the custody and care of people in BOP-managed facilities, which included approximately 140,000 people as of July 2022.<sup>3</sup> BOP is required to help federally incarcerated people obtain ID documents, including birth certificates, Social Security cards, and driver's licenses or other official photo identification before

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<sup>1</sup>Bureau of Justice Statistics, *Prisoners in 2020—Statistical Tables*, NCJ 302776 (Washington, D.C.: December 2021).

<sup>2</sup>For example, see Hartman, Michael, *Providing Identification for Those Released From Incarceration*, National Conference of State Legislatures, April 2022; and National Reentry Resource Center, *State Identification: Reentry Strategies for State and Local Leaders*, April 2016.

<sup>3</sup>BOP also oversees approximately 16,000 additional incarcerated people in privately-managed facilities and other types of facilities, such as Residential Reentry Centers. BOP contracts with these facilities, also known as halfway houses, to provide assistance to people in the form of employment counseling, job placement, financial management assistance, and other services in a structured and supervised environment.

their release.<sup>4</sup> States may also assist people incarcerated in their correctional systems with obtaining these types of ID documents. Some states have enacted various laws to assist people with obtaining ID documents before their release, while others provide this assistance through coordination with administrative agencies such as their state's correctional department or Department of Motor Vehicles (DMV).<sup>5</sup>

You asked us to review and report on the processes in place to help ensure that incarcerated people leave prison with ID documents, and the numbers of those people. This report addresses (1) the process that BOP has in place to assist incarcerated people with obtaining ID documents, (2) the extent to which formerly incarcerated people were released from BOP facilities with ID documents, and (3) the processes that selected states have put in place to assist people incarcerated in state facilities with obtaining ID documents.

To address our first objective, we reviewed relevant legislation and BOP policies and procedures to gain an understanding of BOP's processes to assist incarcerated people with obtaining ID documents. This included reviews of a BOP Program Statement, memoranda of understanding (MOUs) with three states allowing those states' DMVs to process state-issued photo IDs at BOP facilities, a Statement of Work used to develop contracts with Residential Reentry Centers (RRC), and training materials.

To address the second objective, we obtained and analyzed data from SENTRY, BOP's case management database for incarcerated people, for sentenced, adult U.S. citizens released from BOP facilities from calendar years 2018 through 2021. Our analyses assessed the extent to which incarcerated people were released from a BOP facility with different types of ID documents, and facility and individual characteristics of those people (i.e., facility security level, incarceration length, and demographic

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<sup>4</sup>34 U.S.C. § 60541(b)(1). For the purposes of this report, we refer to people incarcerated in federal or state prisons as "incarcerated people". We also refer to driver's licenses or other official non-driver photo identification issued by state motor vehicle agencies as "state-issued photo ID" documents. In addition, we refer to Social Security cards, birth certificates, and state-issued photo ID documents collectively as "ID documents."

<sup>5</sup>While states refer to their motor vehicle agencies by many different names, we will generally refer to them as DMVs throughout this report.

data).<sup>6</sup> We selected this timeframe because 2018 was the first year in which the Insight application used by BOP staff to record ID-related data into SENTRY was fully deployed, and 2021 was the last full calendar year for which these data were available for our review.<sup>7</sup>

As part of our data analysis, we developed multivariate logistic regression models using the data we received from BOP to assess the extent to which certain attributes—specifically, facility security level, incarceration length, race, ethnicity, gender, and veteran status—were associated with obtaining different ID documents.<sup>8</sup> A multivariate logistic regression analyzes the association of each individual factor on the likelihood of a binary outcome (e.g., acquisition of an ID document) while accounting for other factors in the model. This allowed us to test the association between both individual and BOP facility characteristics and obtaining an ID document, adjusted for other factors.

We assessed the reliability of BOP’s data by conducting electronic tests to identify missing data, anomalies, or potentially erroneous values; reviewing BOP documentation and data dictionaries; and conducting interviews with relevant BOP staff (as discussed below). We determined that the data on ID documents were sufficiently reliable for describing the number and characteristics of people leaving BOP facilities with ID documents presented in this report.

To supplement our document and data reviews for the first and second objectives, we interviewed officials from BOP headquarters to discuss the processes by which BOP staff provide ID assistance and record data on people’s ID document status, as well as successes and challenges in the process. We also interviewed BOP staff from a non-generalizable sample

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<sup>6</sup>Our analyses focused on when incarcerated people are released from a BOP facility—meaning the people left the last BOP facility in which they were incarcerated before transitioning to an RRC, home confinement, or the community. Some of these people—such as those in RRCs or under home confinement—are still serving their sentence and in BOP custody. However, they are not in a BOP facility.

<sup>7</sup>Insight was not fully deployed across all BOP facilities until April 2018. BOP officials stated that they did not gather data for all three ID document types prior to Insight deployment.

<sup>8</sup>Multivariate modeling is a statistical approach that examines several variables simultaneously to estimate whether each of these variables are more or less likely to be associated with a certain outcome.

of five different BOP facilities to discuss some of these same topics.<sup>9</sup> In addition, we interviewed BOP staff from a non-generalizable sample of five Residential Reentry Management offices that oversee RRCs in the states that our selected BOP facilities were located in to discuss how RRCs assist residents with obtaining ID documents, the information captured regarding this assistance, and other related issues. Though the information provided by BOP facility and Residential Reentry Management staff cannot be generalized across all such facilities or offices, the information gathered provides valuable insights into the processes by which BOP facilities and RRCs assist people with obtaining ID documents.

Using information provided by BOP and shared during these interviews, we assessed BOP's efforts to develop a federal ID card—particularly efforts to identify and leverage stakeholder input—against project management criteria on stakeholder management from the Project Management Institute's *A Guide to the Project Management Body of Knowledge*.<sup>10</sup> In addition, using documentary information provided by BOP, our data analyses, and interviews with BOP officials, we assessed BOP's efforts to gather and analyze data on the ID document status of incarcerated people against internal control standards on obtaining and internally communicating quality information to achieve agency objectives.<sup>11</sup>

We also interviewed subject matter experts from seven different research and advocacy organizations in order to learn about the types of challenges encountered by incarcerated people in obtaining ID documents or being released from prison without ID documents, among

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<sup>9</sup>We selected facilities that were located in the states chosen for our case study and represented a mix of security levels. The methodology for our case study review of states is discussed as part of our third objective below.

<sup>10</sup>Project Management Institute, Inc. *A Guide to the Project Management Body of Knowledge (PMBOK® Guide)*, Sixth Edition, 2017. *PMBOK* is a trademark of Project Management Institute, Inc.

<sup>11</sup>GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: Sept 10, 2014).

other things.<sup>12</sup> We also held two discussion groups with eight people who had served sentences in BOP facilities to discuss their experiences with obtaining ID documents while incarcerated. We worked with a group representing formerly incarcerated people to recruit people who volunteered to participate in these group discussions. While our interviews with these people are not generalizable, they provided important perspectives.

To address our third objective, we selected a non-generalizable sample of six states—Colorado, Florida, Minnesota, Montana, Ohio, and Virginia—to serve as case studies for how states assist incarcerated people with obtaining ID documents. We selected these states to ensure we included ones that used a range of different approaches to provide ID assistance, and included states with and without an MOU between the states' DMV and BOP.<sup>13</sup> We reviewed documentation from each state, such as state laws, agency policies, and MOUs or interagency agreements between some states' correctional departments and DMVs, to gain an understanding of the programs and processes in place to assist incarcerated people. We also interviewed officials from each state's correctional department and DMV to discuss their processes as well as successes and challenges experienced in each state. While the information that we gathered from these states cannot be generalized to represent the efforts or experiences of all states nationwide, it provides valuable examples of different approaches that states have taken to assist incarcerated people with obtaining ID documents. For further information on our objectives, scope, and methodology, see appendix I.

We conducted this performance audit from July 2021 to December 2022 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 the

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<sup>12</sup>Subject matter experts include DOJ officials and research or advocacy organizations that we met with during our review, including the National Governors Association, National Conference of State Legislatures, American Association of Motor Vehicle Administrators, the Urban Institute, Vera Institute of Justice, the Legal Action Center, and JustLeadershipUSA. We identified these entities through internal research and recommendations from other organizations.

<sup>13</sup>To gather information on the approaches each state uses, we conducted internal research of publicly available information and obtained recommendations from subject matter experts (e.g., DOJ officials and research or advocacy organizations) on states with particularly comprehensive or robust approaches.

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evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

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### The Role of ID Documents in Reentry

Hundreds of thousands of people leaving federal and state prisons each year may face challenges and have needs when re-entering the community. Such needs may include assistance with education, employment, or housing; treatment for mental health or substance use disorders; and reestablishing positive social support networks. The reentry challenges that people face can sometimes lead them to reoffend and return to prison. We have previously reported on the challenges that people faced upon reentering society after incarceration.<sup>14</sup>

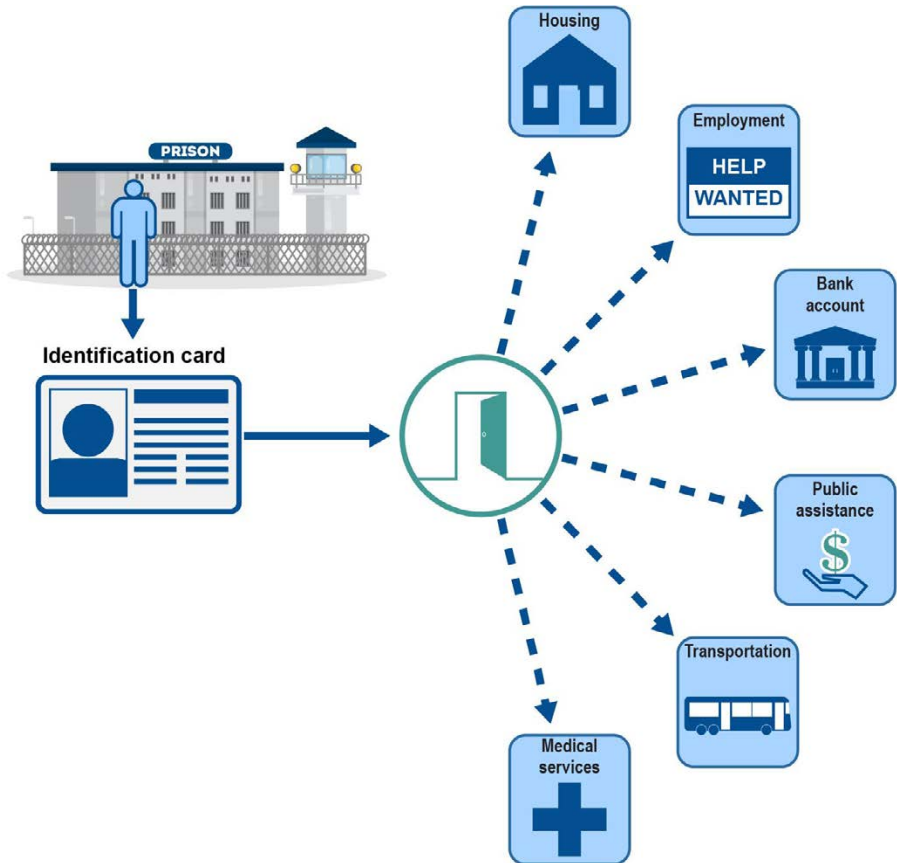
As illustrated in figure 1, proper ID documents are often necessary to access employment and housing, open a bank account, or receive health services, among other things. According to the National Reentry Resource Center, these ID documents may have been lost, damaged, or expired during the person's incarceration. Formerly incarcerated people may also find it difficult to obtain these documents after their release from prison. Also, many released people do not have access to birth certificates or Social Security cards, which are frequently required for obtaining state-issued photo IDs.<sup>15</sup>

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<sup>14</sup>GAO, *Second Chance Reentry Grants: DOJ Should Report Limitations When Publishing Performance Data*, GAO-22-104641 (Washington, D.C.: April 6, 2022); *Department of Justice: Continued Action Needed to Address Incarceration Challenges and Offenders' Reentry*, GAO-18-275T (Washington, D.C.: Dec. 13, 2017); *Nonviolent Drug Convictions: Stakeholders' Views on Potential Actions to Address Collateral Consequences*, GAO-17-691 (Washington, D.C.: Sept. 7, 2017); and *Inmate Reentry Programs: Enhanced Information Sharing Could Further Strengthen Coordination and Grant Management*, GAO-13-93 (Washington, D.C.: Dec. 14, 2012).

<sup>15</sup>National Reentry Resource Center, *State Identification: Reentry Strategies for State and Local Leaders*, April 2016.

**Figure 1: Examples of Needs People Reentering the Community May Have That Require Identification Documents**



Source: Bureau of Prisons and other research entities; artinspring/stock.adobe.com. | GAO-23-105302

Note: The types of identification documents required to access these benefits and services may vary. Because numerous federal agencies are involved in assisting people with reentering the community, several interagency efforts have been established over the years to address these challenges, including issues related to ID documents.<sup>16</sup> Most recently, in May 2022, Executive Order 14074 established a Federal Interagency Alternatives and Reentry

<sup>16</sup>In 2011, the U.S. Attorney General convened the Federal Interagency Reentry Council—a group of federal agencies whose mission was to assist those returning from prison and jail in becoming productive citizens, among other things. In 2018, this council was disbanded and a new Federal Interagency Council on Crime Prevention and Improving Reentry was established and subsequently disbanded in 2021.

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Committee, which is tasked with removing barriers to securing government-issued identification, among other things.<sup>17</sup>

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## Key Legislation and BOP Policy

The Second Chance Act of 2007 required the director of BOP to assist incarcerated people in obtaining identification—including a Social Security card, driver’s license or other official photo identification, **or** birth certificate (emphasis added)—prior to release.<sup>18</sup> The First Step Act of 2018 amended the Second Chance Act of 2007 to require the director of BOP to assist incarcerated people in obtaining identification, including a Social Security card, driver’s license or other official photo identification, **and** a birth certificate (emphasis added).<sup>19</sup>

BOP incorporated these requirements into its internal policy regarding the release of incarcerated people. Specifically, BOP policy requires staff to help incarcerated people with obtaining the aforementioned documents, in addition to any other documents needed by the person, prior to release.<sup>20</sup> This policy also states that BOP staff “will make a reasonable effort” to assist people in obtaining appropriate documents.

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## BOP Roles and Responsibilities

BOP manages 121 facilities housing incarcerated people in six geographic regions across the country. These facilities vary by the security level assigned to each person (i.e., administrative, high, medium, low, and minimum).<sup>21</sup> People may be incarcerated in a BOP facility in the

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<sup>17</sup>Exec. Order No. 14,074, *Advancing Effective, Accountable Policing and Criminal Justice Practices to Enhance Public Trust and Public Safety*, 87 Fed. Reg. 32,945 (May 25, 2022). In August 2022, DOJ officials stated that this committee has begun holding biweekly meetings.

<sup>18</sup>Pub. L. No. 110-199, § 231, 122 Stat. 657, 683-89 (2008).

<sup>19</sup>Pub. L. No. 115-391, § 604, 132 Stat. 5194, 5241-42 (2018).

<sup>20</sup>BOP Program Statement 5325.07, *Release Preparation Program*, as amended August 15, 2019.

<sup>21</sup>Administrative facilities serve special missions, such as the detention of pretrial detained people, the treatment of people with serious or chronic medical problems, or containment of very dangerous or escape-prone people.



state in which they have established residence or in a BOP facility located in another state.

Upon intake at a BOP facility, BOP is to assess an incarcerated person's work, programming (such as necessary educational or drug treatment programs), and reentry needs. Specifically, within 28 days of arrival, BOP staff are to conduct an initial classification meeting in order to develop a program plan for the person during incarceration, including determining what types of ID documents the person possesses or needs to obtain, among other things.<sup>22</sup> Every subsequent 180 days after the initial classification meeting (or every 90 days if the person is within 1 year of release), BOP staff are to conduct program review meetings.<sup>23</sup> During these meetings, staff are to monitor progress in recommended programs, suggest new programs or training based on skills gained during incarceration, and provide assistance with obtaining ID documents to the extent possible.

Many incarcerated people finish out the terms of their sentence at RRCs. Among other things, RRCs are to determine if incoming residents possess a birth certificate or state-issued photo ID card. If the residents do not possess such ID documents, the RRC is to assist and facilitate the process of obtaining them.<sup>24</sup>

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## ID Documents and Issuing Entities

Various agencies are involved in the issuance of ID documents.

**Social Security cards.** The Social Security Administration (SSA) provides U.S. citizens or people lawfully authorized to work in the U.S., including incarcerated people, with original and replacement Social Security cards. In order to obtain a replacement Social Security card, a person must apply online or in-person and provide proof of citizenship or current lawful, authorized work status, and identity to SSA.

**Birth certificates.** Vital statistics offices at the state, city, county or other local levels maintain official birth certificates in the locality where the birth

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<sup>22</sup>The person's program plan is generally to include work and programming activities to allow successful reentry into the community.

<sup>23</sup>BOP Program Statement P5322.13, *Inmate Classification and Program Review*, May 16, 2014.

<sup>24</sup>BOP *Statement of Work, Residential Reentry Center*, April 2017.

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took place. The information required to obtain a birth certificate can vary by state.

**State-issued photo IDs.** State DMVs are responsible for processing and issuing state-issued photo IDs, which include general, non-driver ID cards or driver's licenses. Each state in the U.S. has its own processes and requirements for issuing a photo ID to a person. States generally may require a person to present some combination of documents—such as a birth certificate, Social Security card, and proof of residence—in order to validate their identity and state of residence before issuing a photo ID. According to the Department of Homeland Security, all states have begun producing state-issued photo IDs that are REAL ID compliant in order to meet forthcoming federal requirements for air travel.<sup>25</sup>

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## BOP Has a Process to Assist People, but Has Not Leveraged Stakeholder Expertise in Developing a New ID

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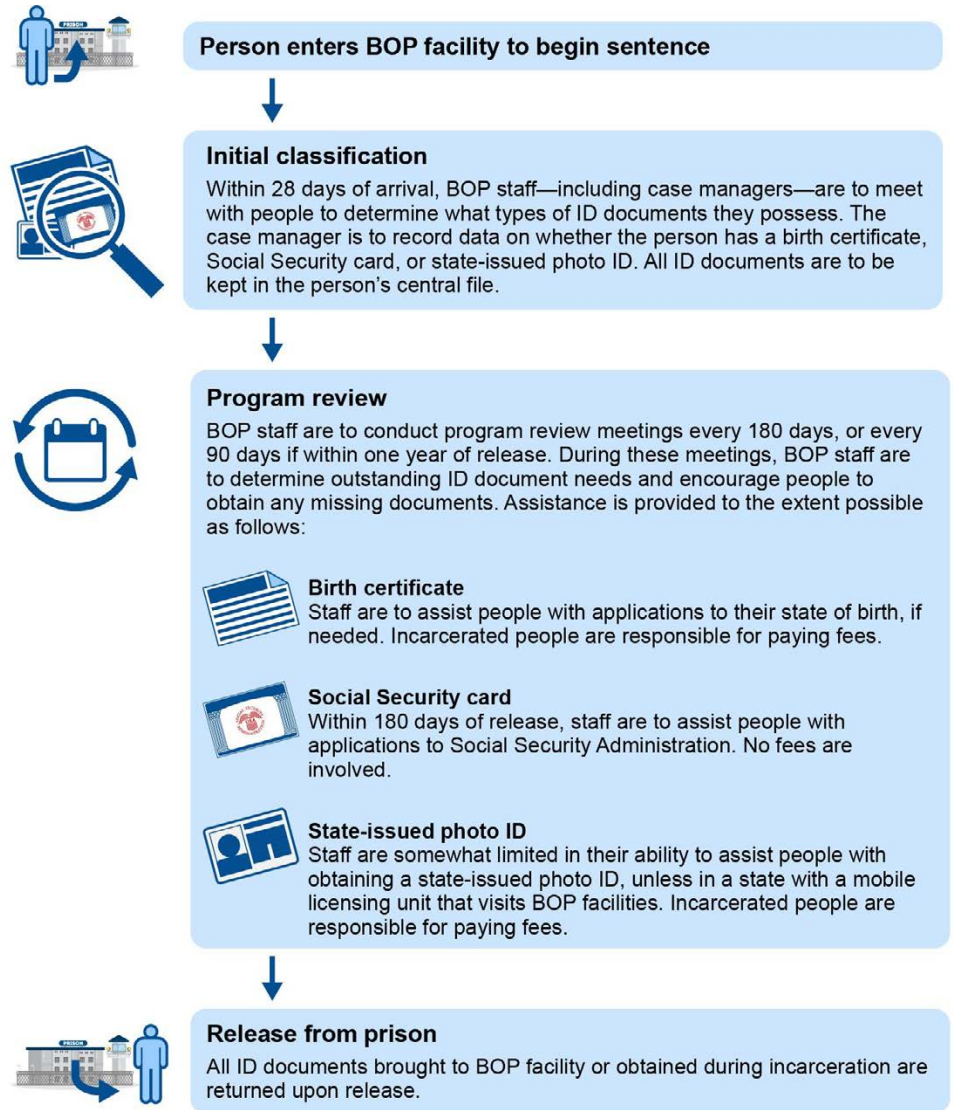
### BOP Has a Process to Help Incarcerated People Obtain Certain ID Documents

BOP officials reported that they have a process for working with people throughout their incarceration to assist them with obtaining ID documents, to the extent possible. The steps in this process are shown in figure 2.

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<sup>25</sup>The REAL ID Act of 2005, Pub. L. No. 109-13, 119 Stat. 231, establishes minimum security standards for license issuance and production and prohibits certain federal agencies from accepting for certain purposes driver's licenses and identification cards from states not meeting the Act's minimum standards. The official purposes covered by the Act include, but are not limited to, accessing certain federal facilities, boarding federally regulated commercial aircraft, entering nuclear power plants, and any other purposes determined by the Secretary of Homeland Security. Pub. L. No. 109-13, § 201, 119 Stat. 302, 311-12 (2005) (See 49 U.S.C. § 30301 note). The Department of Homeland Security implemented a phased enforcement plan for the REAL ID Act and has declared that as of May 3, 2023, U.S. travelers must be REAL ID compliant to board domestic flights and access certain federal facilities.

**Figure 2: Illustration of the Federal Bureau of Prisons' (BOP) Process for Assisting People with Obtaining Identification (ID) Documents**



Source: Federal Bureau of Prisons; artinspring/stock.adobe.com. | GAO-23-105302

Specifically, during the initial classification and subsequent program review meetings, BOP staff—most notably case managers—are to meet with incarcerated people, document the types of ID documents they possess, and discuss ways of obtaining those documents that people do not possess. If a person has any ID documents at home or in the possession of a friend or family member, BOP staff are to encourage

them to have the ID documents sent to the facility to be kept in their central file (a physical file containing key documents, among other things, for the person).<sup>26</sup> As people obtain each type of ID document during incarceration, case managers are to update BOP's case management system to reflect possession of that ID document and store the physical document in the person's central file until they are released.

In addition to these regular meetings, staff that we met with from BOP headquarters and all five BOP facilities stated that they also assist incarcerated people with ID documents through training and other mechanisms. For example, as part of regular training intended to prepare incarcerated people for reentry into society, BOP staff stated that they offer a course to people that discusses the importance of ID documents and processes for obtaining them during incarceration or upon release. In addition, BOP staff are to post information on how to obtain state-issued photo IDs on electronic information sharing systems accessible to people at each BOP facility.

**Social Security Cards.** BOP has an MOU with SSA that contains a provision allowing an incarcerated person to apply for a replacement Social Security card within 180 days of their planned release from a BOP facility into an RRC, the community, or another detaining authority. BOP staff are to help people complete and submit the proper forms and application to SSA as their release date draws near. This process includes verifying biographical information submitted against other documents held at BOP facilities and witnessing people's signatures. According to officials we interviewed at five BOP facilities, the process is generally successful, with some officials noting that it is simple and a Social Security card can be obtained at no cost to the person.

**Birth Certificates.** According to BOP documentation and officials, incarcerated people can consult BOP staff or their facility's electronic information sharing system at any time during or after their initial classification meeting for information on obtaining a birth certificate from their state of birth. The information required to obtain a birth certificate can vary by state. Facility staff are to work with people to fill out the application forms, and the incarcerated individuals then send them to the appropriate state agency for approval.

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<sup>26</sup>In addition, BOP is currently seeking to finalize an Interagency Agreement with U.S. Marshals Service establishing that when the Marshals Service transfers a person to BOP's custody, the agency will also turn over any ID documents to BOP.

**State-Issued Photo IDs.** BOP officials stated that facility staff will inform incarcerated people about the importance of obtaining a state-issued photo ID upon release. However, these officials state that BOP's direct assistance in obtaining ID documents for most incarcerated people is largely limited to Social Security cards and birth certificates. This is, in part, because BOP generally does not take anyone at a security level higher than minimum to DMV offices and state-issued photos IDs generally require an in-person visit. BOP has MOUs with three states—Florida, North Carolina, and Virginia—that allow those states' DMVs to bring a mobile unit (i.e., bus or van) to BOP facilities at designated times to process state-issued photo IDs for those people with the proper supporting documents.<sup>27</sup>

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## BOP Identified Challenges in Obtaining ID Documents

BOP officials reported several inherent challenges generally outside of their control when assisting incarcerated people in obtaining ID documents. For example:

- BOP staff that we interviewed from all five facilities stated that the cost of obtaining a birth certificate—which can vary from \$5 to \$34 depending on the state or territory—was one of the biggest challenges incarcerated people faced in obtaining ID documents. Similarly, people may not have the money to pay for a state-issued photo ID.
- Some states may not consider incarcerated people to be residents of their state or will not accept a BOP facility address, and therefore, will not issue these incarcerated people an ID document.<sup>28</sup>
- State-issued photo IDs generally have to be obtained in person from a state DMV, but for security reasons, BOP does not take anyone who is at a security level higher than minimum to DMV offices.
- According to BOP officials, the mobile onsite ID issuance available in Florida, North Carolina, and Virginia was largely suspended at the onset of the COVID-19 pandemic. BOP officials informed us that U.S. Penitentiary Lee in Virginia was scheduled to resume mobile onsite

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<sup>27</sup>The processes that two of these states—Florida and Virginia—employ in providing state-issued photo IDs to federal and state incarcerated people are described in appendix IV. The MOU with North Carolina covers only non-driver IDs.

<sup>28</sup>In addition, some states may require an eye examination before issuing a driver's license. While BOP officials stated that the agency contracts with optometrists who can perform these eye examinations, some states may not accept these exams if the optometrist is not licensed in the state issuing the driver's license.

issuance in October of 2022, while mobile ID issuance in North Carolina and Florida remains on hold due to COVID-19.

- BOP headquarters officials and staff from one facility stated that having to wait until 180 days before an incarcerated person's release to apply for a Social Security card—per the MOU with SSA—is often not enough time to obtain the card before a person's release. This is particularly true if a person's planned release date gets moved up during the 180 days. To address this challenge, BOP officials have stated that they have contacted SSA to request an increase to this time frame to 365 days before their current MOU expires in January 2023.
- People may have legally had their name changed but do not have documentation of the change, which is required for a Social Security card.
- BOP officials cannot compel people to apply for ID documents. Incarcerated people in BOP custody may simply not be interested in obtaining ID documents, even if it would be beneficial to them, or may not trust BOP staff to obtain the document on their behalf.

Appendix II contains perspectives from people formerly incarcerated in the federal prison system about their experiences with obtaining ID documents during incarceration and after release to an RRC.

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## BOP Is Developing a New Federal ID Card but Has Not Identified and Leveraged All Key Stakeholders in Its Development

BOP is developing a federal ID card for people reentering the community, but has not fully identified all key stakeholders or leveraged their expertise to ensure it maximizes the card's full potential. BOP officials stated that the purpose of the ID card is to provide a valid form of identification for people who are unable to obtain a state-issued photo ID prior to their release.

In February 2021, according to BOP officials, BOP began working with representatives of the Transportation Security Administration, Immigration and Customs Enforcement, and the Government Printing Office to develop a federal ID card that would be acceptable for employers

verifying employees' identity.<sup>29</sup> BOP and these entities also conducted market research to compile information on security features that would reduce the risk of counterfeiting such an ID and allow BOP's ID card to contain features consistent with those of REAL ID-compliant ID documents.<sup>30</sup> In November 2022, BOP officials informed us that they have designed a new release ID card and expect to begin producing a prototype in the second quarter of fiscal year 2023. While BOP officials stated that they focused on developing a mockup of a federal ID card first, their hope is that the card could be exchanged "one-for-one" for a state-issued photo ID, or used as one source of proof of identity for people to receive a state-issued photo ID.

In June 2022, BOP officials stated that they have begun outreach to officials from states' governor's offices and DMVs to discuss the possibility of their accepting this ID card in a "one-for-one" exchange or as proof of identity for the purposes of obtaining a state-issued photo ID.<sup>31</sup> However, BOP officials stated that they have not identified other key stakeholders, such as public assistance benefits providers, state health agencies, financial service providers, or housing agencies, or leveraged their expertise. As such, BOP has not determined whether or how the card might be accepted to address needs of people reentering the community, such as access to public assistance, Medicaid, housing, health care, or banking services. Furthermore, since BOP is pursuing state acceptance of this new ID card, it cannot guarantee that states will accept the federal ID card—which means that if people are unable to obtain a state-issued photo ID, they may not be able to use the new

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<sup>29</sup>Specifically, BOP officials have stated that they worked with these agencies to help ensure that the new federal ID card would be an acceptable proof of identity that employees can submit to employers in conjunction with U.S. Citizenship and Immigration Services Form I-9, *Employment Eligibility Verification*. All U.S. employers must properly complete Form I-9 for each individual they hire for employment in the United States.

<sup>30</sup>BOP estimates that its ID card will cost approximately \$5.20 to \$5.58 per card. BOP officials stated that the agency plans to use First Step Act funding to develop the new ID card, and incarcerated people will not be required or expected to pay for the ID card.

<sup>31</sup>DOJ and BOP have conducted similar state outreach efforts in the past. Specifically, under the direction of the former Federal Interagency Reentry Council, in 2016, the Attorney General sent letters to all 50 states asking to work with those states to allow their acceptance of BOP identification for releasing people seeking to obtain state-issued photo ID. BOP then began contacting all 50 states to discuss this request during 2016. However, according to BOP officials, this effort was no longer a priority beginning in 2017. The Council was formally disbanded in 2018. The scope of this report is focused on current efforts.

federal ID for other purposes or to obtain other services, particularly those offered by states.

According to the Project Management Institute's *A Guide to the Project Management Body of Knowledge*, in managing a project, expertise should be gathered from individuals or groups with specialized knowledge or training in project requirements or requirements analysis to meet project needs.<sup>32</sup> Interviewing subject matter experts can aid in identifying and defining the features and functions of the desired project deliverables. In addition, project managers should manage stakeholders by identifying the people, groups, or organizations that could impact or be impacted by the project, to analyze stakeholder expectations and their impact on the project, and to develop appropriate management strategies for effectively engaging stakeholders in project decisions and execution. Before finalizing plans to produce and distribute its new ID card to incarcerated people, BOP has an opportunity to identify other key stakeholders, such as advocacy groups, housing agencies, or public benefits providers, and leverage their expertise. Taking such a step could better position BOP to maximize peoples' potential use of the ID card by pursuing acceptance by other entities beyond state photo ID providers.

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## BOP Data Show that About Half of Released People Had an ID Document, but Certain BOP Data Are Incomplete and Inconsistent

Since 2018—when BOP began recording ID status for all three types of ID documents in its case management system—52 percent of people released from a BOP facility had at least one of the three ID documents in their possession.<sup>33</sup> However, some BOP data related to ID status are not complete or consistent. In addition, BOP has not assessed its data collection efforts to determine if it is collecting the most useful data, nor has it analyzed any data it collects to inform its ID assistance efforts. Further, BOP does not collect ID-related data on people in their custody

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<sup>32</sup>Project Management Institute, Inc. *A Guide to the Project Management Body of Knowledge (PMBOK® Guide)*, Sixth Edition, 2017.

<sup>33</sup>These data are recorded by case managers in BOP's Insight application. Insight is an application within BOP's SENTRY case management system and was implemented in April 2018. BOP officials were unsure if and how ID status data were tracked before April 2018, as these data have been archived and are not available for review.



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once they have transferred to RRCs.

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## About Half of People Released from BOP Facilities Had at Least One ID Document; Social Security Cards Were the Most Common

Based on our analysis of 146,565 people released from a BOP facility from calendar years 2018—the year BOP began collecting data on all three ID documents—through 2021, about 52 percent had at least one ID document in their possession at the time of their release,<sup>34</sup> exceeding BOP's goal of 45 percent of people to have at least one form of ID upon release.<sup>35</sup>

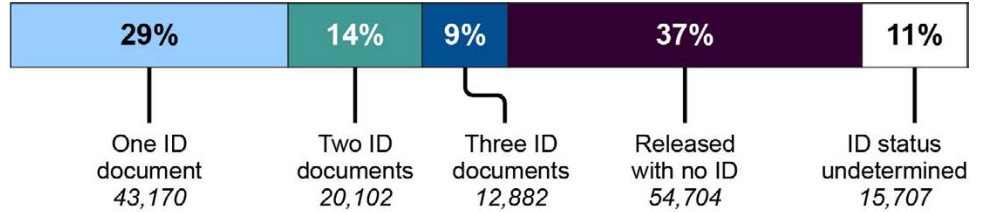
Of the people released from a BOP facility from calendar years 2018 through 2021, 37 percent did not have any ID document in their possession upon release, and 11 percent had an undetermined ID status. Of those people who were released with ID documents, most had one ID, as shown in figure 3.

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<sup>34</sup>Data we analyzed include convicted and sentenced U.S. citizens. We examined records of the 146,565 incarcerated people that were released during this time period. For people who were incarcerated more than once during this time period, we analyzed their ID status from their most recent incarceration. We were unable to determine the ID status for 11 percent of people. For most of these people's records (13,956, or 10 percent) BOP's data did not contain information on the individual's ID status. BOP officials told us that the entries might not contain a status due to the incremental rollout of the data fields in the Insight application at BOP facilities in 2018 (not all facilities had these data fields available until April 2018), and because completing these data fields is not required by policy. Of all released people in our data, 5,669 (or 4 percent) were released through April 2018 from facilities in which Insight had not been fully implemented. In addition, the ID status for 1,751 people (1 of the 11 percent) was recorded outside of their incarceration dates, thus we categorized these records as "ID status undetermined". BOP officials told us that this might happen when people are not released at the end of their sentence, which can occur when there is a pending court case, among other things.

<sup>35</sup>BOP officials explained that some incarcerated people may have ID documents at home, but those ID documents should not be reflected in BOP data. Therefore, BOP officials told us that BOP is to count the person as having an ID document at the time of release if the ID document is in BOP's direct physical possession at the BOP facility. However, as discussed later in this report, BOP case managers may report a person as having an ID document if the person initially reports that they have the ID document at home.

**Figure 3: Percentage and Number of People Released from a Federal Bureau of Prisons (BOP) Facility with Number of Identification (ID) Documents in Their Possession, Calendar Years 2018 through 2021**



Source: GAO analysis of BOP data. | GAO-23-105302

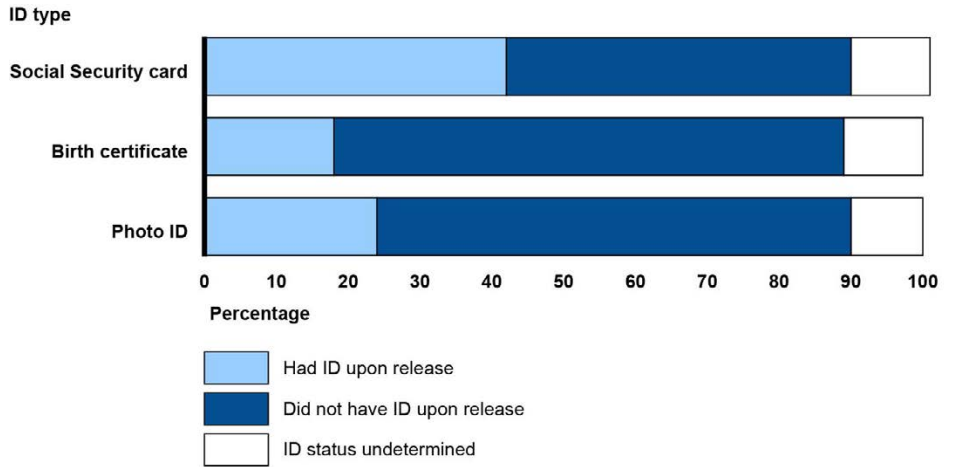
**Accessible Data for Figure 3: Percentage and Number of People Released from a Federal Bureau of Prisons (BOP) Facility with Number of Identification (ID) Documents in Their Possession, Calendar Years 2018 through 2021**

Category	Number	Percentage
One ID document	43,170	29
Two ID documents	20,102	14
Three ID documents	12,882	9
Released with no ID	54,704	37
ID status undetermined	15,707	11

Notes: Data include convicted and sentenced U.S. citizens. We examined records for 146,565 incarcerated people released from BOP facilities from 2018 through 2021. For people who were incarcerated more than once during this time period, we analyzed their ID status from their most recent incarceration. We were unable to determine the ID status for 13,956 of the 146,565 people because BOP’s data did not contain information on the individual’s ID status. BOP officials told us that some entries might not contain a status due to the incremental rollout of the data fields at BOP facilities in 2018 (not all facilities had these data fields available until April 2018), and because completing these data fields is not required by policy. In addition, the ID status for 1,751 people (1 of the 11 percent) was recorded outside of their incarceration dates, thus we categorized these records as “ID status undetermined”. BOP officials told us that this might happen when people are not released at the end of their sentence, which can occur when there is a pending court case, among other things.

Of the three ID documents, the highest percentage of people were released with Social Security cards during this time period, as shown in figure 4.

**Figure 4: Percentage of People Released from a Federal Bureau of Prisons (BOP) Facility with Each Type of Identification (ID) Document in Their Possession, Calendar Years 2018 through 2021**



Source: GAO analysis of BOP data. | GAO-23-105302

**Accessible Data for Figure 4: Percentage of People Released from a Federal Bureau of Prisons (BOP) Facility with Each Type of Identification (ID) Document in Their Possession, Calendar Years 2018 through 2021**

Category	Had ID upon release	Did not have ID upon release	ID status undetermined
Social Security card	42	48	11
Birth certificate	18	71	11
Photo ID	24	66	10

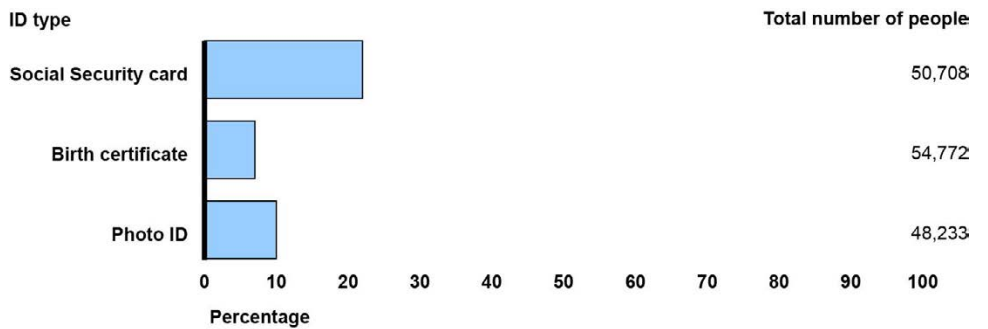
Notes: Data include convicted and sentenced U.S. citizens. We examined records for 146,565 incarcerated people released from BOP facilities from 2018 through 2021. For people who were incarcerated more than once during this time period, we analyzed their ID status from their most recent incarceration. We were unable to determine the ID status for certain individuals because BOP’s data did not contain information on the individual’s ID status, including 15,252 individuals for Social Security cards, 15,719 individuals for birth certificates, and 14,659 individuals for state-issued photo IDs. BOP officials told us that some entries might not contain a status due to the incremental rollout of the data fields at BOP facilities in 2018 (not all facilities had these data fields available until April 2018), and because completing these data fields is not required by policy. We also could not determine the ID status for additional people because the ID information was recorded for these people outside their incarceration dates—623 people for Social Security card entries, 625 people for birth certificate entries, and 589 people for state-issued photo ID entries. BOP officials told us that this might happen when people are not released at the end of their sentence, which can occur when there is a pending court case, among other things.

These data represent the number of people who were released from a BOP facility with each of the ID documents—regardless of whether they

brought the ID document with them to the BOP facility, had it mailed to the BOP facility, or BOP assisted them with obtaining the ID.

We further analyzed data on people whose incarceration began no sooner than 2018 to identify people whose ID status changed from not having an ID document to having it before their release. This provided us with an estimate of the number of people that obtained an ID document while they were incarcerated, rather than those who entered the BOP facility with ID documents in their possession. Based on our review of this subset of BOP data, we estimated that between 7 percent and 22 percent of people whose incarceration began and ended from calendar years 2018 through 2021 were able to obtain an ID document while incarcerated, as shown in figure 5.<sup>36</sup>

**Figure 5: Percentage of People Who Obtained Identification (ID) Documents while Incarcerated at a Federal Bureau of Prisons (BOP) Facility, Calendar Years 2018 through 2021**



Source: GAO analysis of BOP data. | GAO-23-105302

<sup>36</sup>BOP officials told us that when the ID status field is updated, it may mean that BOP assisted the person in applying for and obtaining the new ID document, or that the person may have had a family member send the existing ID document to the facility.

**Accessible Data for Figure 5: Percentage of People Who Obtained Identification (ID) Documents while Incarcerated at a Federal Bureau of Prisons (BOP) Facility, Calendar Years 2018 through 2021**

Category	Percentage who obtained an ID while at a BOP facility	Total number of people
Social Security card	22	50,708
Birth certificate	7	54,772
Photo ID	10	48,233

Notes: Data include convicted and sentenced U.S. citizens whose incarceration began and ended from 2018 through 2021 and entered without each ID type. Because 1) BOP ID status data does not indicate whether the person entered a facility with an ID document and 2) BOP only began to collect ID data on all three ID documents in calendar year 2018, we analyzed data on people whose incarceration began no sooner than 2018 to be able to determine whether the ID status for some people changed from having no ID upon arrival at the facility to having an ID before their release.

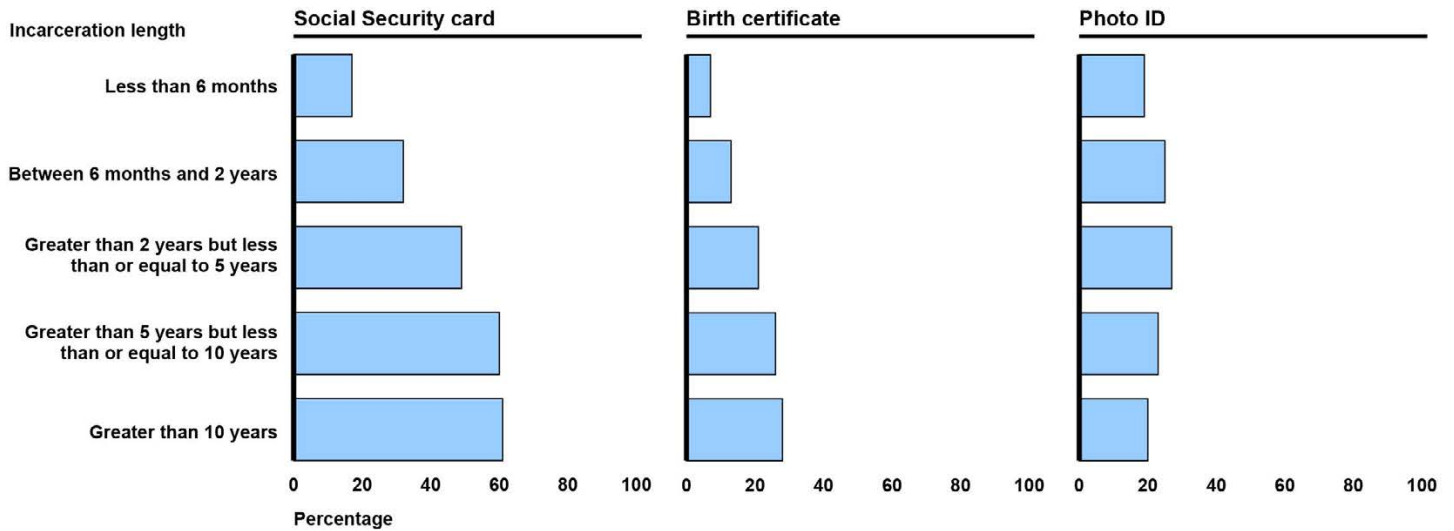
We also analyzed BOP data on ID status by selected characteristics. While these data provide additional insights into who leaves a BOP facility with each of the ID documents, they do not represent any causal relationship, as many factors could contribute to why a person has an ID document.

**Incarceration length.** While we are not able to confirm a causal relationship, based on our analysis of data for people released from a BOP facility from calendar years 2018 through 2021, people who were incarcerated for less than 6 months left a BOP facility with ID documents in their possession less frequently than those who served longer incarcerations, as shown in figure 6 below.<sup>37</sup> BOP officials stated that they assist people with obtaining ID documents, regardless of incarceration length. However, these officials stated that there are sometimes challenges with ID applications and there may not be enough time to

<sup>37</sup>For the purposes of this analysis, we defined the length of incarceration as the time that the person spent incarcerated in a BOP facility.

obtain ID documents during shorter incarceration terms, particularly those of 6 months or fewer.<sup>38</sup>

**Figure 6: Percentage of People Released from a Federal Bureau of Prisons (BOP) Facility with Identification (ID) Documents, By Incarceration Length, Calendar Years 2018 through 2021**



Source: GAO analysis of BOP data. | GAO-23-105302

**Accessible Data for Figure 6: Percentage of People Released from a Federal Bureau of Prisons (BOP) Facility with Identification (ID) Documents, By Incarceration Length, Calendar Years 2018 through 2021**

Incarceration length	Social Security card	Birth certificate	Photo ID
Less than 6 months	17	7	19
Between 6 months and 2 years	32	13	25
Greater than 2 years but less than or equal to 5 years	49	21	27
Greater than 5 years but less than or equal to 10 years	60	26	23
Greater than 10 years	61	28	20

Notes: Data include convicted and sentenced U.S. citizens. We examined records for 146,565 incarcerated people released from BOP facilities from 2018 through 2021. For people who were incarcerated more than once during this time period, we analyzed their ID status from their most recent incarceration. We were unable to determine the ID status for certain individuals because BOP's data did not contain information on the individual's ID status, including 15,252 individuals for

<sup>38</sup>We conducted a regression analysis of a subset of these people and found statistically significant differences between incarceration lengths. Specifically, we found that people serving shorter lengths of incarceration were less likely to leave BOP facilities with Social Security cards and birth certificates than those serving longer incarcerations. See appendix I for more information on our data analysis methodology, and appendix III for the results of our regression analyses.

Social Security cards, 15,719 individuals for birth certificates, and 14,659 individuals for photo IDs. BOP officials told us that some entries might not contain a status due to the incremental rollout of the data fields at BOP facilities in 2018 (not all facilities had these data fields available until April 2018), and because completing these data fields is not required by policy. We also could not determine the ID status for additional people because the ID information was recorded for these people outside of their incarceration dates—623 people for Social Security card entries, 625 people for birth certificate entries, and 589 people for photo ID entries. BOP officials told us that this might happen when people are not released at the end of their sentence, which can occur when there is a pending court case, among other things. While these data provide additional insights into who leaves a BOP facility with each of the ID documents, they do not represent any causal relationship, as many factors could contribute to why a person has an ID document.

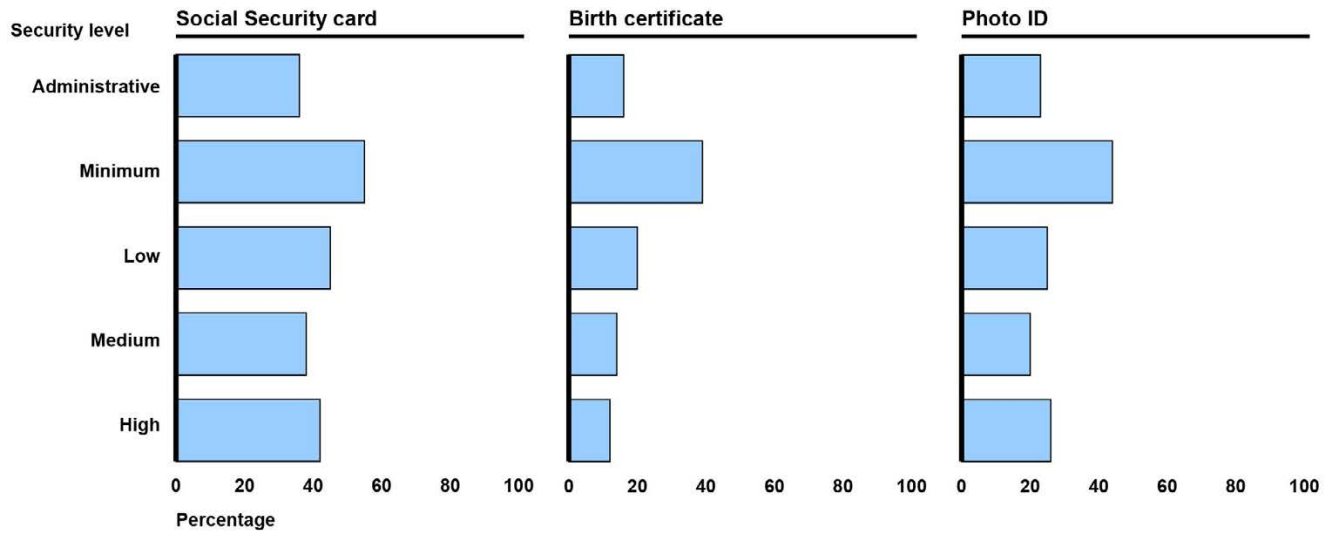
**Facility security level.** Based on our analysis of BOP data, people released from minimum security facilities from calendar year 2018 through 2021 left with each ID document type in their possession more often than people released from higher security facilities, as shown in figure 7.<sup>39</sup> While we are not able to confirm a causal relationship, according to BOP officials, it is more likely that people at minimum security facilities would have ID documents versus those in higher security facilities since, for example, some of them might be allowed to obtain a driver's license in order to drive work vehicles around the facility.<sup>40</sup>

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<sup>39</sup>While these data represent the security level of the facility from which the person was released, people may move to different security levels during their incarceration.

<sup>40</sup>We conducted a regression analysis of a subset of these people and found statistically significant differences between security levels. We generally found that people released from BOP facilities at a lower security level were more likely to have ID documents than those released from facilities with a higher security level. See appendix I for more information on our data analysis methodology and appendix III for the results of our regression analyses.

**Figure 7: Percentage of People Released from a Federal Bureau of Prisons (BOP) Facility with Identification (ID) Documents, by Facility Security Level, Calendar Years 2018 through 2021**



Source: GAO analysis of BOP data. | GAO-23-105302

**Accessible Data for Figure 7: Percentage of People Released from a Federal Bureau of Prisons (BOP) Facility with Identification (ID) Documents, by Facility Security Level, Calendar Years 2018 through 2021**

Security level	Social Security card	Birth certificate	Photo ID
Administrative	36	16	23
Minimum	55	39	44
Low	45	20	25
Medium	38	14	20
High	42	12	26

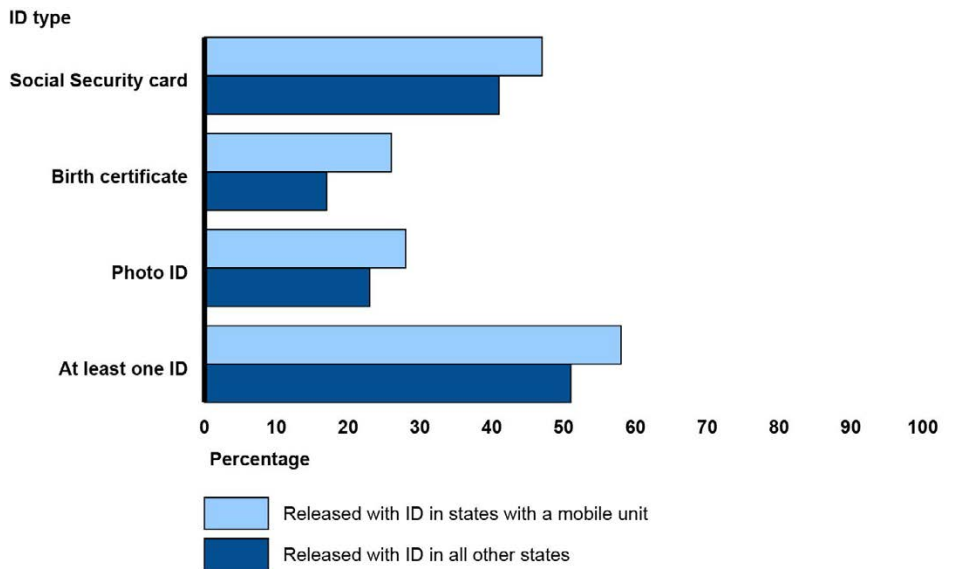
Notes: Data include convicted and sentenced U.S. citizens. We examined records for 146,565 incarcerated people released from BOP facilities from 2018 through 2021 and utilized the security level of the last facility where they were incarcerated. For people who were incarcerated more than once during this time period, we analyzed their ID status from their most recent incarceration. We were unable to determine the ID status for certain individuals because BOP’s data did not contain information on the individual’s ID status, including 15,252 individuals for Social Security cards, 15,719 individuals for birth certificates, and 14,659 individuals for photo IDs. BOP officials told us that some entries might not contain a status due to the incremental rollout of the data fields at BOP facilities in 2018 (not all facilities had these data fields available until April 2018), and because completing these data fields is not required by policy. We also could not determine the ID status for additional people because the ID information was recorded for the person outside of his or her incarcerations dates—623 people for Social Security card entries, 625 people for birth certificate entries, and 589 people for photo ID entries. BOP officials told us that this might happen when people are not released at the end of their sentence, which can occur when there is a pending court case, among other things. People may move from one facility to another during their incarceration. For this analysis, we analyzed the security level of the facility in which the person was last incarcerated. While these data provide additional insights into who leaves a BOP facility with each of the ID documents, they do not



represent any causal relationship, as many factors could contribute to why a person has an ID document.

**Facilities with MOUs.** In Virginia, North Carolina, and Florida—the three states that utilize mobile licensing units—47 percent of the 18,236 people who left a BOP facility in those states from 2018 through 2021 were released with a Social Security card, 26 percent with a birth certificate, and 28 percent with a state-issued photo ID.<sup>41</sup> In states that do not utilize mobile licensing units, these percentages were 41 percent, 17 percent, and 23 percent, respectively, as shown in figure 8. While mobile licensing units only assist with state-issued photo IDs, having a Social Security card or birth certificate may still be needed for proof of identification.

**Figure 8: Percentage of People Released from a Federal Bureau of Prisons (BOP) Facility with Identification (ID) Documents, in States that Utilize Mobile Licensing Units Compared to All Other States, Calendar Years 2018 through 2021**



Source: GAO analysis of BOP data. | GAO-23-105302

<sup>41</sup>According to BOP officials, these states issue photo IDs only to those people with known addresses in those respective states.

**Accessible Data for Figure 8: Percentage of People Released from a Federal Bureau of Prisons (BOP) Facility with Identification (ID) Documents, in States that Utilize Mobile Licensing Units Compared to All Other States, Calendar Years 2018 through 2021**

Category	Percentage released with ID in states with a mobile unit	Percentage released with ID in all other states
Social Security card	47	41
Birth certificate	26	17
Photo ID	28	23
At least one ID	58	51

Notes: Data include convicted and sentenced U.S. citizens. We examined records for 146,565 incarcerated people released from BOP facilities from 2018 through 2021. 18,236 of the 146,565 people were released from a state with a mobile licensing unit. For people who were incarcerated more than once during this time period, we analyzed their ID status from their most recent incarceration. We were unable to determine the ID status for certain individuals because BOP's data did not contain information on the individual's ID status, including 15,252 individuals for Social Security cards, 15,719 individuals for birth certificates, and 14,659 individuals for photo IDs. BOP officials told us that some entries might not contain a status due to the incremental rollout of the data fields at BOP facilities in 2018 (not all facilities had these data fields available until April 2018), and because completing these data fields is not required by policy. We also could not determine the ID status for additional people because the ID information was recorded for the person outside of his or her incarceration dates—623 people for Social Security card entries, 625 people for birth certificate entries, and 589 people for photo ID entries BOP officials told us that this might happen when people are not released at the end of their sentence, which can occur when there is a pending court case, among other things. People may move from one facility to another during their incarceration. For this analysis, we analyzed the facility in which the person was last incarcerated. While these data provide additional insights into who leaves a BOP facility with each of the ID documents, they do not represent any causal relationship, as many factors could contribute to why a person has an ID document.

See appendix III for additional demographic data on people released from BOP facilities with ID documents.

**Certain BOP Data Are Not Complete or Consistent and BOP Has Not Assessed its Data Collection Efforts**

We identified multiple instances in which BOP does not collect complete or consistent data, nor has BOP assessed the data it is collecting. Specifically, we found that BOP did not have complete data on ID status. In addition, BOP has not assessed whether it is collecting the most useful data, nor has it analyzed data collected to determine how, if at all, it could improve its assistance to incarcerated people.

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### Incomplete and Inconsistent Data Gathering

We found that BOP did not collect complete data on the ID status of all incarcerated people.<sup>42</sup> Specifically, based on our analysis of BOP data for calendar years 2018 through 2021, we found the following examples of incomplete or inconsistent data.

- BOP's data did not contain information on the individual's ID status for 10 percent of people (13,956) released from 2018 through 2021.<sup>43</sup>
- In addition, we found that BOP may not have consistent data on what it means when it reports that a person has an ID document. For example, BOP officials stated that they trained staff on how to record ID status but we found inconsistencies in how officials reported collecting these data. Specifically, BOP staff at all five facilities we spoke with stated they would only mark an ID status as "yes" if the ID document was in their possession. However, BOP headquarters officials stated that although ID status field should only be marked as a "yes" if the ID document is physically at the BOP facility, some staff may choose to mark the ID status as a "yes" if people initially tell them that they have the ID document at home or with a family member and plan to have it sent to the facility.<sup>44</sup> Thus, staff at different BOP facilities may be taking different approaches to recording the ID status data.

ID-related data may be incomplete or inconsistent because, according to BOP headquarters officials, BOP does not require staff to complete the ID status field, or record the data in any consistent manner. To address this issue, BOP officials stated that they are considering revising their policy on inmate classification and program review to require these data to be

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<sup>42</sup>BOP officials have stated that they have to rely on incarcerated people to provide documentation, and as such their data may not be complete. While BOP may have to rely on incarcerated people to provide documentation, this would not affect their ability to collect data on whether or not a person has provided such documentation.

<sup>43</sup>BOP officials noted that not all facilities had access to the ID data fields until April 2018. However, of all released people in our data, 5,669 (or 4 percent) were released before April 2018 from facilities in which Insight had not been fully implemented.

<sup>44</sup>If the person did not have the ID document sent to the facility at a later time, BOP officials stated that staff would then mark the ID status as "no" at all subsequent Program Review meetings with the incarcerated person. This means that by the time of a person's release from a BOP facility, any ID status field marked "yes" should mean that BOP has the ID in its possession. However, while incarcerated, these data could mean different things.

collected. However, officials stated such a change would require negotiations between agency management and its employee union and, as such, it is not known what changes would be accepted.

*Standards for Internal Control in the Federal Government* state that agency management should obtain quality information to achieve the agency's objectives.<sup>45</sup> Without a requirement to ensure standardized data gathering across all BOP facilities, BOP does not have complete or consistent information on how many incarcerated people have each type of ID document at their facility. This lack of complete, consistent information may make it difficult for BOP to determine which people in their custody are in need of assistance with obtaining ID documents.

#### Assessment of Data Collection Efforts

While BOP collects some data related to ID documents, it has not assessed what data would provide the most useful information. We identified several examples of potential data that BOP could consider to provide clearer and more detailed information on the number of people with or without ID documents, and why they may not have those documents.

- Some BOP facility staff stated that in some instances, people may have ID documents at home and choose not to have them sent in to the BOP facility. Further, in our interviews with eight formerly incarcerated people, one person stated that she did not bring her ID documents to the BOP facility during her sentence because she had heard that BOP loses ID documents. Therefore, she only provided photocopies of her ID documents. According to BOP officials, BOP would record this person as not having an ID since it is not in BOP's possession. However, BOP has not assessed whether creating a unique data field for collecting data on people who report having ID documents at home would be important information to collect.
- BOP has a data field to capture information on why a person may not have a Social Security card or birth certificate. Specifically, when inputting data on incarcerated people during initial or recurring meetings, BOP facility staff have the option to record the reason why the person does not possess either of these two ID documents. The reason could be that a request for the document had already been

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<sup>45</sup>GAO-14-704G.

submitted, or that the person refuses to obtain the document, among others.<sup>46</sup> Our analysis of BOP data pertaining to the reason incarcerated people did not have a Social Security card or birth certificate found 55 percent and 59 percent of records, respectively, contained an entry indicating “other” as the reason, as shown in table 1 below.

**Table 1: Reasons People Did Not Have a Social Security Card or Birth Certificate When Released From a Federal Bureau of Prisons (BOP) Facility, Calendar Years 2018 through 2021**

Reason	Social Security Card	Birth Certificate
Inmate not U.S. Citizen	1%	1%
Inmate refuses to provide or complete an application	24%	29%
Not within time frame	13%	N/A
Request Sent to Agency	6%	1%
Social Security Card Application Denied	1%	N/A
Used Multiple Social Security Numbers in Past	<1%	N/A
Other	55%	59%
Not enough funds to obtain	N/A	10%

Legend: N/A = Not applicable as fields are not identical for both ID document types.

Source: GAO analysis of BOP data. | GAO-23-105302

Notes: Data include convicted and sentenced U.S. citizens. Of the 146,565 people that were released from a BOP facility during this time, this analysis only includes people that did not have a Social Security card (69,925) or birth certificate (104,532). BOP case managers are able to select more than one reason why an individual might not have an ID document.

Within the “other” responses presented above, BOP staff used free form data entry fields to provide a description of the reason for not having the ID document in some cases. Within those entries were a large number of differing responses. Specifically, we noted 5,902 unique remarks spanning 100,167 records in the free form data entry fields for case managers to elaborate on, or add further detail to, the record when the reason “other” is selected. However, of those 100,167 records, we noted that at least 30,300 of the remarks stated the phrase “not specified” or a variation of “not specified.” An additional 479 entries in the remarks field were “N/A,” making it

<sup>46</sup>Other reasons the case manager could record for lack of these ID documents include denial of the application submitted; the person was not a U.S. citizen, used multiple Social Security numbers in the past, or is not within the allowed timeframe to apply for a Social Security card; does not have the funds for a birth certificate, or other (with a freeform field used to specify the reason).

difficult to identify why incarcerated people might not have ID documents. BOP has not assessed if there would be more informative data to collect on why someone does not have a birth certificate or social security card.

- In addition, while BOP captures the reasons why people do not have Social Security cards or birth certificates, it is not considering collecting similar data on the reasons why a person does not have a state-issued photo ID on-site at the BOP facility. Some people may lack the money to pursue obtaining a state-issued photo ID, while some are otherwise not interested in obtaining a state-issued photo ID.

BOP officials have noted that any efforts to have staff gather additional data would require changes to agency policy and additional internal negotiations to be approved. We acknowledge that while this would require some additional policy development efforts on BOP's part, this highlights the importance of BOP assessing which data would be beneficial to gather. *Standards for Internal Control in the Federal Government* state that agency management should use and internally communicate quality information to achieve the agency's objectives.<sup>47</sup> Without assessing what data elements it collects on ID document status, BOP may be missing opportunities to collect data that would be more informative. Such data could provide BOP with clearer information on the number of people who could be assisted, compared to those not interested in obtaining certain ID documents. This would allow BOP to better target its efforts to provide ID assistance when possible.

### Analysis of Data

Further, BOP regional offices gather data from all facilities within each region that detail the number of people within 30 days of release who have at least one type of ID document. However, BOP does not have a complete understanding of why people do not have certain ID documents. This is because BOP does not analyze data on the number of people released with each type of ID document or the reasons why people do not have ID documents, though some of these data are available in BOP's data system. BOP officials informed us that they have not analyzed the reasons for not having ID documents because they are aware of the barriers to obtaining ID documents, and some of those barriers are beyond the agency's control to address. While some barriers may be

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<sup>47</sup>GAO-14-704G.

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outside BOP's control, some barriers may be possible for it to address, such as helping people better understand the importance of having ID documents sent to their BOP facility from home. *Standards for Internal Control in the Federal Government* state that agency management should use and internally communicate quality information to achieve the agency's objectives.<sup>48</sup> Analyzing the data, once it is comprehensively and consistently collected, could help BOP better target its efforts in assisting incarcerated people with obtaining ID documents.

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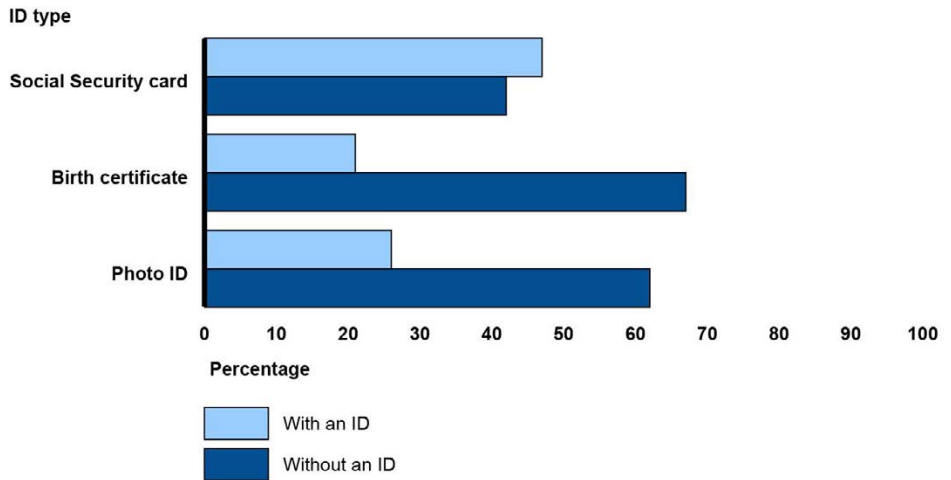
### BOP Does Not Collect ID-Related Data for People Residing at RRCs

According to BOP data, 65 percent of people released from a BOP facility between calendar years 2018 through 2021 were transferred to an RRC. However, BOP does not collect data on ID status once people are transferred. While residing at an RRC, people are expected to obtain employment. As discussed earlier in our report, ID documentation is important for obtaining employment and addressing a variety of other needs upon reentry into the community. However, based on our analysis of BOP data, about 32 percent of people who were released from a BOP facility and transferred to an RRC from 2018 through 2021 did not have any of the three ID documents when they were transferred to an RRC. As shown in figure 9, people transferred to RRCs most commonly had a Social Security card in their possession.

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<sup>48</sup>GAO-14-704G.

**Figure 9: Percentage of People Transferred to Residential Reentry Centers with Identification (ID) Documents In Their Possession, Calendar Years 2018 through 2021**



Source: GAO analysis of BOP data. | GAO-23-105302

**Accessible Data for Figure 9: Percentage of People Transferred to Residential Reentry Centers with Identification (ID) Documents In Their Possession, Calendar Years 2018 through 2021**

Category	Percentage with an ID	Percentage without an ID
Social Security card	47	42
Birth certificate	21	67
Photo ID	26	62

Notes: Data include convicted and sentenced U.S. citizens. Of the 146,565 records for incarcerated people released from BOP facilities from 2018 through 2021, this figure includes data on the 65 percent, or 94,980 people, that were released to an RRC. Of these 94,980 people that were released to an RRC, we were unable to determine the ID status for certain individuals because BOP's data did not contain information on the individual's ID status., including 10,898 individuals for Social Security cards, 11,265 individuals for birth certificates, and 10,635 individuals for photo IDs. BOP officials told us that some entries might not contain a status due to the incremental rollout of the data fields at BOP facilities in 2018 (not all facilities had these data fields available until April 2018), and because completing these data fields is not required by policy. We also could not determine the ID status for additional people because the ID information was recorded for these people outside their incarceration dates—460 people for Social Security card entries, 465 people for birth certificate entries, and 435 people for photo ID entries. BOP officials told us that this might happen when people are not released at the end of their sentence, which can occur when there is a pending court case, among other things. For people released to an RRC who were incarcerated more than one during this time period, we analyzed their most recent release during that time period to determine ID status.

BOP requires RRCs to assist residents with obtaining ID documents and maintain data on the number who have ID documents, but BOP does not know how many people obtain ID documents after leaving a BOP facility.



Specifically, the RRC Statement of Work states that the RRC is to determine upon intake if the resident possesses a valid birth certificate or state-issued ID card “and maintain related data.” It also states that if the resident does not possess a state-issued ID card, the RRC is to assist and facilitate the resident in the process of obtaining one.

Officials from BOP headquarters and the five Residential Reentry Management offices we met with stated that they do not obtain information related to how many residents are obtaining ID documents. The Statement of Work for contracts does not require RRCs to gather and report the information to BOP. The Statement of Work requires only that the RRC maintain the information. However, these officials stated that they do receive reports on the number of residents obtaining employment while housed at an RRC. These officials told us that they consider employment rates to be an effective proxy for ID documents such as photo IDs or Social Security cards, as those types of ID documents would typically be required for obtaining employment.

However, if BOP begins issuing its own federal ID card for releasing people, as discussed earlier, it will be important to understand how many people are successfully exchanging those ID documents for state-issued photo IDs once they are transferred to an RRC. Further, *Standards for Internal Control in the Federal Government* state that agency management should obtain, use, and internally communicate quality information—from both internal and external sources—to achieve the agency’s objectives.<sup>49</sup> By requiring RRCs to report data on ID documents, BOP would gain additional information that the agency could use to help determine the extent to which people in their custody are obtaining ID documents through an RRC.

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## States Employ Varying Processes in Assisting Incarcerated People with Obtaining ID Documents

The six states in our case study—Colorado, Florida, Minnesota, Montana, Ohio and Virginia—use various approaches to assist incarcerated people

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<sup>49</sup>GAO-14-704G.

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in their states' prisons with obtaining ID documents. See appendix IV for more information on each of these states' specific approaches.

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## Social Security Cards and Birth Certificates

Correctional department officials from the six states in our case study stated that they assist people with obtaining a Social Security card or birth certificate as needed during the person's incarceration. Five of the six state correctional departments have an MOU with SSA in their region that allows correctional staff to submit applications for duplicate Social Security cards on behalf of incarcerated people within a certain timeframe before their release. In four of these five states, the MOU allows for these applications to be submitted once people are within 120 days of their release. This time limit is 60 days less than the time SSA gives for federally incarcerated people, who can apply within 180 days of release. In the fifth state, the MOU allows applications for Social Security cards to be submitted within 180 days of release.

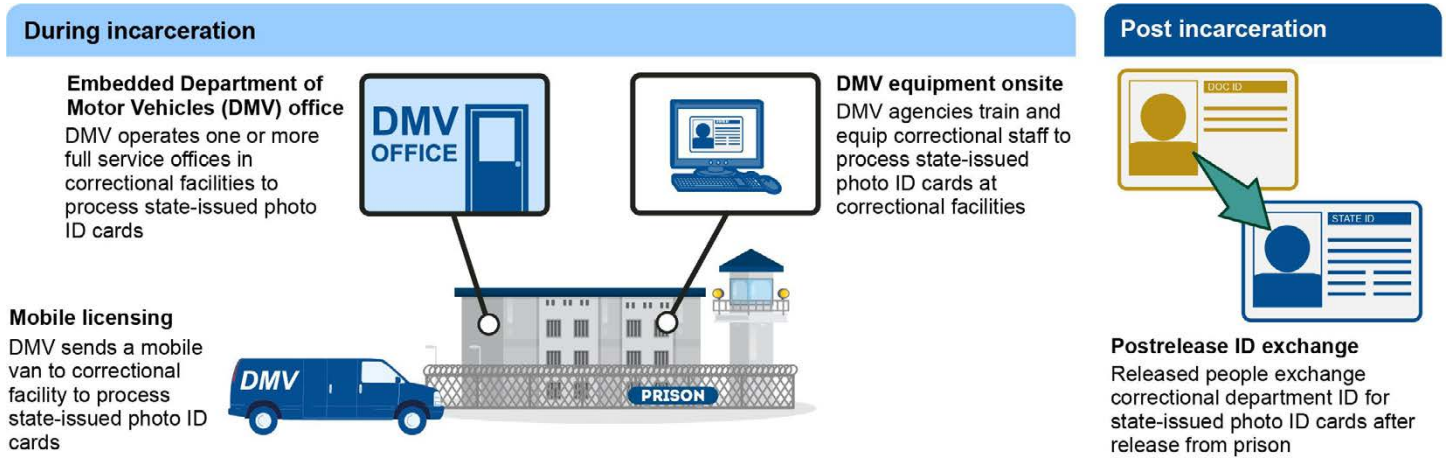
While the application process for a birth certificate is completed by mail in some states, Florida's correctional department uses an electronic process that automatically transmits incarcerated people's data to the Department of Health once a month to obtain certified copies of the people's birth certificates. Correctional department officials in the states we spoke to generally cited better success obtaining birth certificates for people born in the same state as their facilities, rather than those born out-of-state. In addition, some states cover the costs of a birth certificate. For example, the state of Florida provides all incarcerated people with a certified copy of their birth certificate at no charge if they were born in-state. Further, Colorado, Minnesota, and Montana correctional departments will pay for a birth certificate for a person born in any state, as long as the incarcerated person needs it to obtain a state-issued photo ID.

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## State-Issued Photo IDs

The six states included in our case study are to assist incarcerated people by providing them with either a state-issued photo ID during incarceration, or a prison-issued ID that could be exchanged for a state-issued photo ID after incarceration. See figure 10 for an illustration of these approaches.

**Figure 10: Examples of Different Approaches to Assist Incarcerated People with Obtaining State-Issued Photo Identification (ID) Documents**



Source: GAO analysis of information provided by selected states; artinspiring/stock.adobe.com. | GAO-23-105302

Note: These are the general approaches taken by the six states in our case study. Other states may take different approaches to assisting incarcerated people with obtaining ID documents.

**Mobile Licensing.** Two states in our case study utilize mobile licensing in which DMV staff drive a bus or van to correctional facilities and process information needed for state-issued photo IDs either inside the vehicle or at the prison facility. The Florida DMV’s Florida Licensing on Wheels program has been operating at state prisons in Florida since 2014. Florida correctional officials provide all required eligibility documents during the mobile visit prior to the issuance of a state photo ID. The Virginia DMV Connect Unit has been operating at Virginia state prisons since 2012. State officials reported that this approach involves close coordination between correctional departments and DMVs. Virginia correctional staff will, in some cases, establish basic eligibility by submitting an incarcerated person’s Social Security card and birth certificate before a mobile visit.

**DMV Offices at Correctional Facilities.** One state in our case study, Colorado, has two DMV offices with DMV personnel embedded at a correctional facility. At a central reception center, DMV staff determine if new people ever had an ID with the DMV, as this will determine if the person needs a Social Security card or birth certificate prior to obtaining a state ID. DMV and correctional department staff are to then assist incarcerated people with obtaining ID documents that the DMV identified as being needed.

**Correctional Staff Use of DMV Equipment and Processes.** State officials from two states in our study—Montana and Minnesota—reported that they trained designated correctional department staff to use DMV equipment and process state-issued photo IDs at correctional facilities. These states' processes are governed by an interagency agreement or MOU.

All three of the above approaches utilize DMV resources for use on-site at correctional facilities, and all have state statutes, policies, or MOUs that mandate or ensure assistance with obtaining a state-issued photo ID. For example, some states, like Colorado and Florida, have codified their approaches into law.<sup>50</sup> Generally, Virginia correctional department operating procedures state that all incarcerated people are to leave their facilities with a state-issued photo ID.<sup>51</sup> Those who are required to obtain a state-issued photo ID but refuse may be sanctioned, resulting in a loss of good conduct time for not cooperating with the policy.<sup>52</sup>

**Correctional Department ID Exchange for State-Issued Photo ID.** One state in our case study, Ohio, reported that it issues all incarcerated people in Ohio an offender release card at the time of their release. The state's DMV accepts this card as a primary form of identification and will do a one-to-one exchange for a state-issued photo ID card upon verification of the person's Social Security number.<sup>53</sup>

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## States Reported Similar Challenges as BOP

State officials we spoke with cited various inherent challenges to assisting incarcerated people with ID documents, many of which were also reported by BOP officials. For example:

- The COVID-19 pandemic placed a halt on most mobile ID issuance units for some time, causing many incarcerated people to leave prison without a state-issued photo ID.

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<sup>50</sup>Colo. Rev. Stat. § 17-33-102. Fla. Stat. § 944.605(7).

<sup>51</sup>Virginia Department of Corrections, Offender Management and Programs, Operating Procedure 820.2, *Inmate Re-entry Planning*, as amended April 28, 2022.

<sup>52</sup>People who prove they have a state-issued photo ID that will be valid upon release are exempt from the requirement to obtain a new photo ID while incarcerated.

<sup>53</sup>See Ohio Rev. Code Ann. § 4507.51(B).

- State correctional departments are sometimes limited to helping incarcerated people who are in-state residents, or native born, when providing assistance in obtaining birth certificates. Depending on other state information requirements, compiling the necessary information to obtain an out-of-state birth certificate can be difficult.
- Officials from three of the six state correctional departments we spoke to stated that the time limit for applying for a Social Security card was too restrictive. As an official from one state noted, this may limit the time available to assist with obtaining a state-issued photo ID if a Social Security card is needed to obtain a photo ID.
- Incarcerated people may not have the information needed to obtain a Social Security card or birth certificate, like parents' names or their dates of birth, or people may not have proof of name changes resulting from marriage or divorce.
- Officials from Florida also noted that ID issuance to incarcerated people in the state was recently cancelled when their mobile ID issuance units were tasked to assist the victims of Hurricane Ian.

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## Conclusions

Having valid ID documents upon release from prison is an important part of the reentry process for incarcerated people. Given the necessity of such documents for accessing employment, housing, and banking, not having ID documents may make it more difficult for some people to productively reenter society. BOP has taken a number of steps to assist incarcerated people with obtaining ID documents where possible and is currently developing its own ID document. While BOP has focused its efforts on ensuring that the ID document contains appropriate security features, opportunities exist to identify and leverage input with stakeholders such as housing authorities, banking institutions, and health providers to better understand if they might accept this ID document in order for people to be able to access their services. Such efforts could greatly enhance the utility of this ID document for formerly incarcerated people when reentering society.

Given the importance of having an ID document, collecting and analyzing complete and consistent data is essential for BOP to be able to assess its efforts. BOP collects data on the number of people released from its custody with various ID documents, which is an important step. However, some of the data being gathered are incomplete or inconsistent. Likewise,

while BOP has taken the important step of tracking the reasons why people do not have Social Security cards or birth certificates, it has not assessed whether there may be more informative data they could collect and analyze. In addition, BOP currently does not require RRCs to report data on the number of people that have ID documents in their facilities. Thus, BOP has opportunities to collect complete and consistent data that could improve its understanding of how many people in its custody do not have ID documents and then analyze these data to identify the factors that may be preventing them from obtaining these documents. Having this greater understanding could allow BOP to better focus its efforts on assisting people, thus helping more of its incarcerated people towards successful reentry.

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## Recommendations for Executive Action

We are making a total of five recommendations to BOP.

In developing its new federal ID card, the Director of BOP should identify key stakeholders and leverage their expertise to help ensure that BOP maximizes the potential uses of the ID card. (Recommendation 1)

The Director of BOP should ensure that BOP policy requires BOP facility staff to record complete and consistent data on whether or not incarcerated people possess each type of ID document. (Recommendation 2)

The Director of BOP should examine the existing data fields to ensure that the appropriate information is being captured to clearly inform BOP of the number of people who have ID documents at home and choose not to have them sent to BOP facilities, as well as the reasons for not having ID documents. (Recommendation 3)

Once BOP collects complete and consistent ID data and examines its existing data fields, the Director of BOP should analyze data bureauwide to gain a better understanding of why people do not have certain ID documents and how the agency can take steps to better assist these people. (Recommendation 4)

The Director of BOP should make changes to the Statement of Work for RRCs to ensure that in future or renegotiated contracts, the RRCs are required to collect and regularly report data to BOP on the number of

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people obtaining ID documents while residing at RRCs.  
(Recommendation 5)

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## Agency Comments and Our Evaluation

We provided a draft of this report to DOJ for review and comment. BOP concurred with our recommendations, and also provided technical comments, which we have incorporated as appropriate. In addition, we provided draft excerpts of the report to the correctional departments and DMVs for the states involved in our case studies. The state officials provided technical comments, which we have incorporated as appropriate.

In response to recommendation 1 to identify key stakeholders and leverage their expertise in developing the new federal ID card, BOP concurred. BOP noted that it has worked with key subject matter experts to ensure that appropriate security features were incorporated into the ID card, and agreed that engaging other stakeholders going forward may be helpful in enhancing the usefulness of the ID card.

In response to recommendation 2 that BOP should require staff to record complete and consistent data on whether or not incarcerated people possess ID documents, BOP concurred and asked that we consider revising the recommendation. As a result, we clarified that BOP policy should require its staff to record complete and consistent data. In its letter, BOP noted that it intends to revise its policy on classification and program review to require staff to record the relevant data, pending negotiations with its union. This action, if fully implemented, should address the intent of our recommendation.

In response to recommendation 3 that BOP examine its existing data fields to ensure appropriate information is being captured for people who have IDs at home, as well as the reasons for not having ID documents, BOP concurred. BOP stated that this recommendation could be addressed by amending its policy on classification and program review, as mentioned above. In its letter, BOP further noted that it would consider adding an item such as “inmate has ID at home” to its data collection efforts, which could address some of the intent of this recommendation. While BOP also stated that people in their custody may not have ID documents for a variety of reasons that would be difficult to accurately capture, we maintain our recommendation that BOP examine its data fields to determine if more appropriate data could be gathered on the

reasons for not having ID documents . Such information could help BOP determine how to better target its assistance to potentially address those reasons.

In response to recommendation 4 that BOP should analyze data bureauwide to better understand why people do not have certain ID documents, BOP concurred. BOP noted that it could potentially address this recommendation by conducting a voluntary survey of incarcerated people through its electronic information sharing system. While such a survey could provide useful information to BOP management, we maintain that addressing recommendations 2 and 3 to capture more complete, consistent, and appropriate data would provide BOP with more robust data that could then be analyzed in response to this recommendation to help the agency better understand how it can take steps to better assist those people without ID documents.

In response to recommendation 5 that BOP should change its Statement of Work with RRCs to ensure that RRCs are required to collect and report data on people obtaining ID documents in future contracts, BOP concurred. BOP stated that it would determine whether changes to the Statement of Work for RRCs are required to ensure collection and regular reporting of data.

See appendix V for a reproduction of BOP's comments.

We are sending copies of this report to the appropriate congressional committees, the Attorney General, and other interested parties. In addition, the 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) 512-8777 or GoodwinG@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 VI.





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Letter

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Gretta L. Goodwin  
Director  
Homeland Security and Justice

## Appendix I: Objectives, Scope, and Methodology

Our objectives were to review (1) the process that the Bureau of Prisons (BOP) has in place to assist incarcerated people with obtaining identification (ID) documents, (2) the extent to which formerly incarcerated people were released from BOP facilities with ID documents, and (3) the processes that selected states have put in place to assist people incarcerated in their state facilities with obtaining ID documents.

To address our first objective, we reviewed relevant legislation and BOP policies and procedures to gain an understanding of legal requirements and BOP's processes to assist incarcerated people with obtaining ID documents. This included a review of BOP's Program Statement that establishes its efforts to assist incarcerated people with obtaining ID documents and memoranda of understanding (MOUs) with three states.<sup>1</sup> These MOUs allow those states' Departments of Motor Vehicles (DMVs) to process state-issued photo ID documents onsite for eligible people at BOP facilities. We also reviewed a copy of the Statement of Work that BOP adopted to develop contracts with Residential Reentry Centers (RRCs) to gather information on how they are to assist residents and capture information on residents' ID documents. In addition, we reviewed training materials, handbooks, and other information used by BOP to communicate the importance of and processes in place to obtain ID documents to incarcerated people, as well as information provided by BOP on their efforts to develop a new federal ID card for incarcerated people.

We supplemented these document reviews by conducting interviews with relevant officials from BOP headquarters offices, such as the Correctional Programs Division and Reentry Services Division, to discuss the processes by which BOP staff assist incarcerated people with obtaining ID documents, successes and challenges in the process, and efforts to develop a new federal ID card. We also interviewed case managers and reentry affairs specialists from a non-generalizable sample of five different BOP facilities to discuss topics such as their assistance processes,

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<sup>1</sup>BOP Program Statement 5325.07, *Release Preparation Program*, as amended August 15, 2019.

successes and challenges. We selected facilities located in the states chosen for our case study and that represented a mix of security levels.<sup>2</sup>

We also held interviews with BOP staff from five Residential Reentry Management offices that oversee RRCs in the states where our selected BOP facilities were located. We asked the staff to discuss their knowledge of how RRCs assist residents with obtaining ID documents, the information captured regarding this assistance, and other related issues.<sup>3</sup> Though the information provided by BOP facility and Residential Reentry Management staff cannot be generalized across all such facilities or offices, the views and information gathered provides valuable insights into the processes by which BOP facilities and RRCs assist people with obtaining ID documents and gather data about their assistance. Using information provided by BOP and shared during these interviews, we assessed BOP's efforts to develop a federal ID card—particularly efforts to identify and leverage stakeholder input—against project management criteria on stakeholder management from the Project Management Institute's *A Guide to the Project Management Body of Knowledge*.<sup>4</sup>

We also interviewed subject matter experts from seven different research and advocacy organizations in order to learn about the types of challenges incarcerated people encounter in obtaining ID documents or

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<sup>2</sup>The methodology for our case study review of states is discussed below in our third objective. Specifically, we selected the following BOP facilities: U.S. Penitentiary Lee in Virginia (high security with adjacent minimum security camp); Federal Correctional Complexes Coleman in Florida (two high security facilities, medium, and low security with adjacent minimum security camp) and Florence in Colorado (administrative, high, and medium security with adjacent minimum security camp); Federal Correctional Institute Waseca in Minnesota (females only, low security); and Federal Correctional Institute Elkton in Ohio (low security). In one of the six states that we selected for our case study, there are no BOP facilities.

<sup>3</sup>BOP operates 22 Residential Reentry Management offices across the nation which, among other things, monitor the performance of RRCs within their jurisdiction and administer contracts for RRCs and community-based programs. The Residential Reentry Management officials we met with were from offices located in Cincinnati, Ohio; Minneapolis, Minnesota; Orlando/Miami, Florida; Phoenix, Arizona; and Raleigh, North Carolina.

<sup>4</sup>Project Management Institute, Inc. *A Guide to the Project Management Body of Knowledge (PMBOK® Guide)*, Sixth Edition, 2017.

being released from prison without ID documents, among other things.<sup>5</sup> In addition, we held two discussion groups with eight people who had served sentences in BOP facilities across five states and were released from 2011 to 2019 to discuss their experiences with obtaining ID documents while incarcerated.<sup>6</sup> We worked with a group representing formerly incarcerated people—JustLeadershipUSA—to recruit people who volunteered to participate in discussion groups. While our interviews with these people are not generalizable, they provided important perspectives. Further, all of these people currently work in the reentry field and could provide perspectives from formerly incarcerated people they work with in this capacity.

To address our second objective, we obtained and analyzed data from SENTRY, BOP’s database for managing information on incarcerated people, for sentenced, adult U.S. citizens released from BOP facilities from calendar years 2018 through 2021. Our analyses assessed the extent to which incarcerated people were released from a BOP facility with different types of ID documents, and facility and individual characteristics of those people (i.e., facility security level, incarceration length, and demographic data).<sup>7</sup> We selected this timeframe because 2018 was the first year in which the Insight application used by BOP staff to record ID-related data into SENTRY was fully deployed, and 2021 was the last full calendar year for which these data were available for our review.<sup>8</sup>

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<sup>5</sup>Subject matter experts include DOJ officials and research or advocacy organizations with whom we met during our review, to include the National Governors Association, National Conference of State Legislatures, American Association of Motor Vehicle Administrators, the Urban Institute, Vera Institute of Justice, the Legal Action Center, and JustLeadershipUSA. We identified these entities through internal research and recommendations from other organizations.

<sup>6</sup>One person did not indicate when their sentence ended.

<sup>7</sup>Our analyses focus on when incarcerated people are released from a BOP facility—meaning the person left the last BOP facility in which they were incarcerated before transitioning to an RRC, home confinement, or the community. Some of these people—such as those in RRCs or under home confinement—are still serving their sentence. However, they are not in a BOP facility.

<sup>8</sup> Insight was not fully deployed across all BOP facilities until April 2018. BOP officials stated that they did not gather data for all three ID document types prior to Insight deployment.

Our analyses of these data included records for 146,565 convicted and sentenced U.S. citizens.<sup>9</sup> For 10,616 people who served more than one incarceration during this time period, we analyzed their ID document status from their most recent incarceration.

We conducted several analyses using these data.

- For all of our analyses that included the facility from which people were released, we used the last BOP facility people were released from because people may have been incarcerated in and release from multiple facilities during their incarceration. This included our analyses that examined the facility security level and whether the facility had an MOU with a state allowing mobile ID document issuance.
- For our analysis of the length of incarceration of people released with ID documents, we used the person's sentence start date and the date for which they were last incarcerated in a BOP facility.<sup>10</sup>
- Our analysis of ID documents obtained by people initially incarcerated and released from 2018 through 2021 included records for 61,735 convicted and sentenced U.S. citizens who entered a BOP facility without at least one ID type. Because BOP only began collecting data on all three ID documents in 2018, we analyzed data on people whose incarceration began no sooner than 2018 to be able to determine whether the ID document status for people changed from having no ID upon arrival to having an ID upon release.
- For our analysis of the reasons people left a BOP facility without ID documents, we limited our analysis to people who did not have an ID upon release. This included 104,349 people released without a birth certificate, and 69,740 people released without a Social Security card.
- Our analysis of the number and percentage of people released to an RRC with ID documents included 94,980 people, representing 65 percent of all people released from a BOP facility from 2018 through 2021.

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<sup>9</sup>BOP provided us data on 153,612 unique individuals. We excluded the records of 7,047 people from our analysis because we were unable to determine the BOP facilities in which they were incarcerated based on the data we received.

<sup>10</sup>In general, we used the actual release date data field to determine the last BOP facility in which a person was incarcerated. In the few instances where the actual release date reflected release from a facility in which a person was not incarcerated (i.e., a BOP office), the incarceration length was calculated using the release date from the last BOP facility in which the person was incarcerated.

**Multivariate Regression Analyses.** Using the data we received from BOP, we developed three multivariate logistic regression models for each of the three ID documents to assess the extent to which certain attributes were associated with obtaining an ID document. Table 2 lists all of the dependent and independent variables we used in our analyses.

**Table 2: Independent and Dependent Variables Included in Regression Analyses**

Category	Category members
<b>Independent Variables<sup>a</sup></b>	Facility Security Level Facility State Incarceration Length (split into quartiles) <sup>b</sup> Race Ethnicity Gender Veteran Status
<b>Outcome (Dependent) Variables – Acquisition of the Following Types of Identification</b>	Birth Certificate Social Security Card Photo Identification (e.g., Driver's License)

Source: GAO summary of data analyzed from the Federal Bureau of Prisons (BOP). | GAO-23-105302

<sup>a</sup>All variables reflect the latest sentence served within the 2018 through 2021 time period. Facility variables were taken from the last BOP facility in which a person was incarcerated.

<sup>b</sup>Incarceration lengths were calculated using the BOP provided actual release date and sentence start date. In the instances where the actual release date reflected release from a facility in which a person was not incarcerated (i.e., a BOP office), the incarceration length was calculated using the release date from the last BOP facility the person was incarcerated in. Incarceration lengths were then categorized into quartiles, created from the distribution of incarceration lengths.

To conduct our statistical analyses, using data BOP provided on all people released from 2018 through 2021, we limited the population of people using two criteria.

- For each model we included only people whose record initially shows that they did not have the respective ID document of interest. We included only these people to help limit the population to people BOP facility staff may have had the opportunity to assist, as this would exclude those who entered the BOP facility with their ID document.
- We excluded people with sentences less than 6 months. BOP officials explained that it could be difficult to assist any person with a sentence of 6 months or less in obtaining ID documents. Thus, this helps to limit the population to people who served a sentence long enough for a BOP facility to assist in ID document acquisition.

After limiting our population to those that fit our criteria, our regression analysis included 91,742 people for our birth certificate model, 74,292

people for our Social Security card model, and 83,471 people for our state-issued photo ID model.

A logistic regression model is appropriate when the model outcome is a binary (yes/no) response. Multivariate modeling is a statistical approach that examines several variables simultaneously, to estimate whether each of these variables are more or less likely to be associated with a certain outcome. A multivariate logistic regression analyzes the association of each individual factor on the likelihood of a binary outcome (e.g., ID document acquisition) while simultaneously accounting for other factors in the model. This allowed us to test the association between both individual and BOP facility characteristics and obtaining an ID document, adjusted for other factors.

A logistic regression model estimates an odds ratio, where a value greater than 1 indicates a higher or positive association, and a value less than 1 indicates lower odds or likelihood of an outcome. The statistical significance of the logistic regression model results is assessed by a p-value of less than 0.05. As a result, in our report odds ratios that are statistically significant and greater or lower than 1.00 indicate that variable is more likely or less likely, respectively, to be associated with obtaining an ID document. In cases where the p-value was greater than 0.05, we could not conclude that there was a statistically significant association between a variable and the likelihood of a obtaining an ID document. Additionally, a logistic regression model can be used to estimate marginal probabilities. A marginal probability is the estimated response mean calculated when all covariates are fixed at particular value in a previously fit model, except the covariate of interest, which in the case of binary covariates is fixed to 1. The probabilities provided in table 4 in appendix III of our report are marginal probabilities. These probabilities show the probability that a group has an ID document controlling for all other factors.

Regression analyses are subject to limitations. For our analyses, the limitations include:

- These analyses identify associations and do not imply a causal relationship. We did not identify the causes for obtaining an ID document type, and the results of these analyses alone should not be used to make conclusions about the ID document acquisition process.
- These analyses reflect a specific subset of the incarcerated population who were released between 2018 and 2021, with an

incarceration length of at least 6 months, who the facility recorded as not having an ID document when they entered prison.<sup>11</sup>

The results of our regression analysis can be found in appendix III.

We assessed the reliability of BOP's data by conducting electronic tests to identify missing data, anomalies, or potentially erroneous values; reviewing BOP documentation and data dictionaries; and conducting interviews with relevant data management staff and social science analysts in BOP's Office of Research and Evaluation, as well as staff from its Correctional Programs Division, to discuss how staff record data on ID status. We determined that the data on ID documents were sufficiently reliable for the purposes of describing the number and characteristics of people leaving BOP facilities with ID documents. Using documentary information provided by BOP, our data analyses, and interviews with BOP officials, we assessed BOP's efforts to gather and analyze data on the ID document status of incarcerated people against internal control standards on obtaining and internally communicating quality information to achieve agency objectives.<sup>12</sup>

To address our third objective, we selected a non-generalizable sample of six states—Colorado, Florida, Minnesota, Montana, Ohio, and Virginia—to serve as case studies for how states assist incarcerated people with obtaining ID documents. We selected states that used a range of different approaches to providing ID assistance and included states with and without MOUs between the state's DMV and BOP to issue photo IDs onsite at BOP facilities. To gather information on these states' approaches, we:

- Reviewed publicly available articles and reports on state efforts to assist incarcerated people with obtaining ID documents; and

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<sup>11</sup>In cases where people were in BOP facilities prior to January 1, 2018, the required 6 month time period was calculated with a start date of January 1, 2018, since ID document data were not available prior to 2018.

<sup>12</sup>GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: Sept 10, 2014).



- Obtained recommendations from subject matter experts (e.g., DOJ officials, research or advocacy organizations) for states having particularly comprehensive or robust approaches;<sup>13</sup>

We reviewed documentation from each state to gain an understanding of the programs and processes in place to assist incarcerated people. This documentation included state laws and regulations, agency policy documents, handbooks or other materials provided to incarcerated people to guide reentry efforts, and MOUs or interagency agreements between some states' correctional departments and DMVs that define the state's provisions for providing incarcerated people with state-issued photo IDs. We supplemented these document reviews by holding teleconferences with officials from each state's correctional department and DMV to gain a greater understanding of their processes and to discuss successes and challenges experienced by each state. While the information that we gathered from these states cannot be generalized to represent the efforts or experiences of all states nationwide, it provides valuable examples of different approaches that states have taken to assist incarcerated people with obtaining ID documents.

We conducted this performance audit from July 2021 to December 2022 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>13</sup>Research or advocacy organizations that we met with during our review include the National Governors Association, National Conference of State Legislatures, American Association of Motor Vehicle Administrators, the Urban Institute, Vera Institute of Justice, the Legal Action Center, and JustLeadershipUSA.

## Appendix II: Summary of Interviews with Formerly Incarcerated People Regarding Federal Bureau of Prisons (BOP) Assistance in Obtaining Identification (ID) Documents

We met with eight people who had been incarcerated at Bureau of Prisons (BOP) facilities across five states and released from 2011 to 2019.<sup>1</sup> We selected these people by working with an advocacy organization representing formerly incarcerated people. The advocacy organization then solicited volunteers willing to speak to us. We interviewed eight of the people who responded to the organization's request. We conducted two separate discussion groups of four people each. Although these interviews are not generalizable to the experiences of the more than 100,000 people that BOP incarcerates annually, they provided us with important perspectives. In addition, some of these people were released prior to the time period covered in this report and prior to the BOP's current policy on ID documents. These people provided us with information about the types of identification (ID) documents they had prior to starting their sentence, whether they brought their original ID documents with them to the BOP facility, and whether BOP assisted them in obtaining ID documents.

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<sup>1</sup>One person did not indicate when her sentence ended.

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**Appendix II: Summary of Interviews with  
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## **BOP Assistance While Incarcerated**

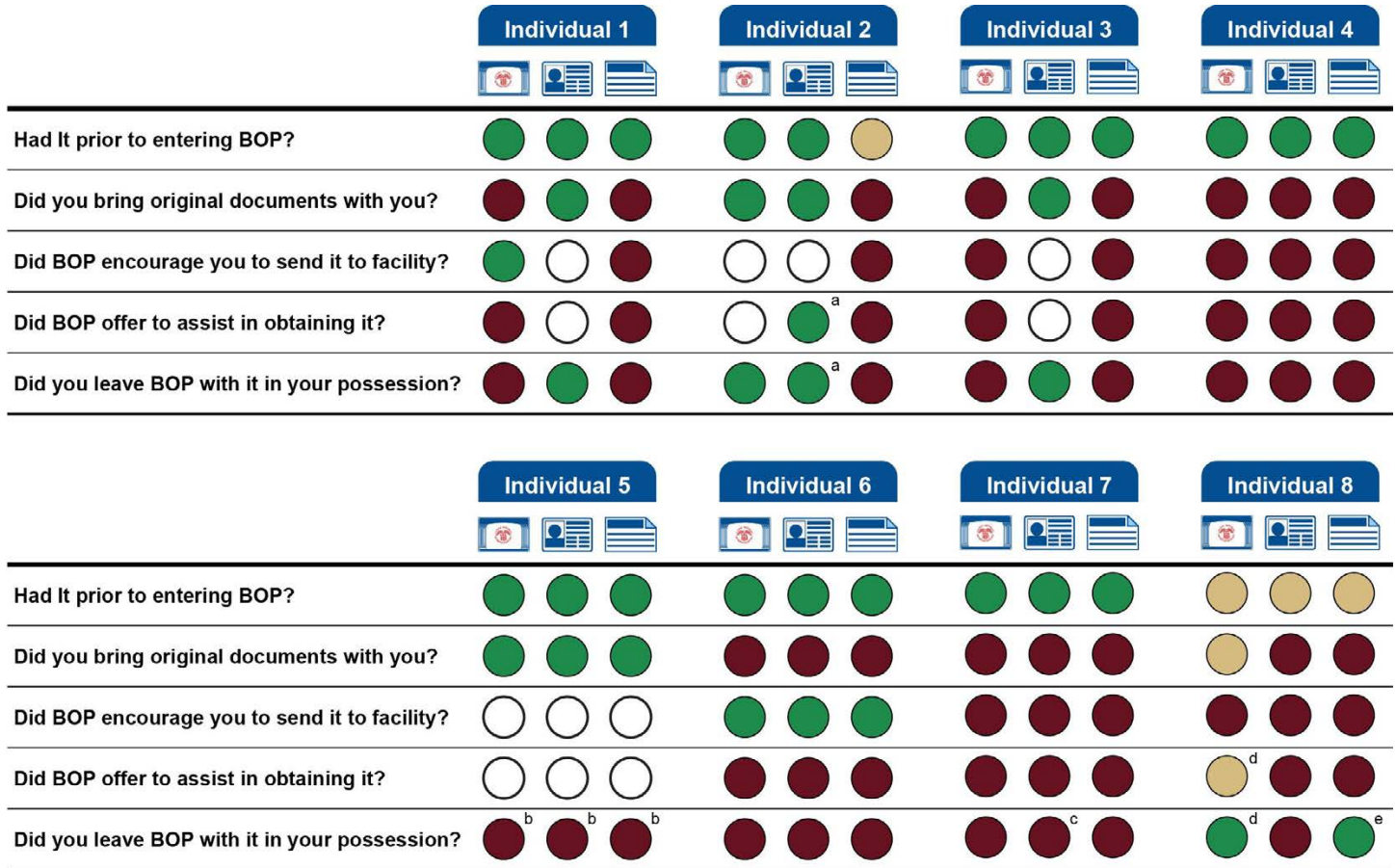
Seven of the eight people we interviewed reported that they had at least one, if not all, of their ID documents either at home or in their possession when they entered the BOP facility, as shown in figure 11.<sup>2</sup>

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<sup>2</sup>For the purposes of this report, we refer to driver's licenses or other official non-driver photo identification issued by state motor vehicle agencies as "state-issued photo ID" documents. In addition, we refer to Social Security cards, birth certificates, and state-issued photo ID documents collectively as "ID documents".

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**Figure 11: Information on Identification (ID) Documents Held by People Formerly Incarcerated at a Federal Bureau of Prisons (BOP) Facility We Interviewed**



**Legend**

	Social Security card	● Yes	○ Not applicable because BOP encouragement or assistance not needed in this situation
	Photo ID	● Unclear	
	Birth certificate	● No	

Source: GAO analysis of discussion groups with individuals formerly incarcerated at Federal Bureau of Prisons facilities. | GAO-23-105302

Notes: These people had been incarcerated at BOP facilities across five states and released from 2011 to 2019. We selected these people by working with an advocacy organization representing formerly incarcerated people. The advocacy organization then solicited volunteers willing to speak to us.

<sup>a</sup>This person's driver's license expired while incarcerated. He became a driver while incarcerated at a camp, and therefore BOP assisted him in obtaining a renewed driver's license. However, the renewed license was only a paper copy, so he still had to obtain a regular photo ID upon release.

<sup>b</sup>This person told us BOP lost all three of her IDs while she was incarcerated.

<sup>c</sup>This person reported that his photo ID expired while incarcerated.

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**Appendix II: Summary of Interviews with Formerly Incarcerated People Regarding Federal Bureau of Prisons (BOP) Assistance in Obtaining Identification (ID) Documents**

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<sup>d</sup>This person could not recall if she brought her Social Security card with her or if a BOP case manager helped her obtain it.

<sup>e</sup>This person reported that a third party organization helped her apply, pay for, and obtain her birth certificate while incarcerated.

The people we interviewed provided the following examples of their experiences.

- One person serving a nearly 2-year sentence stated that although he had all three ID document types, he did not bring them with him at the start of his sentence.<sup>3</sup> He stated that BOP staff did not ask him to provide them while incarcerated, nor did staff encourage that he should have them sent to the BOP facility.
- One person said she brought her state-issued photo ID to the facility, and BOP asked that she have her family send her Social Security card to the facility. She had her family provide a photocopy of her Social Security card. She did not provide any record of her birth certificate to the facility. However, she said no BOP staff told her she needed one or offered to help her apply for a birth certificate. This person was incarcerated at a BOP facility for a 1-year sentence.
- Another person serving a nearly 4-year sentence told us although she had all three ID document types, she did not bring them with her to the BOP facility. She said BOP staff encouraged her to send her ID documents to the BOP facility, but she did not. Rather, she had family members make copies of her ID documents and had the copies sent to the facility.
- One person serving a 4-year sentence said he brought his Social Security card and photo ID (a driver's license) with him to the BOP facility. He told us BOP assisted him with renewing his driver's license while incarcerated at a BOP federal prison camp—a minimum security facility. He noted this was because he was working at the BOP facility and the driver's license would allow him to work as a driver and in the facility's garage. He said he paid for the license renewal and was provided a "paper license" with no photo. As a result, he still had to obtain a license with a photo upon release.
- Three interviewees commented about BOP facilities' handling of ID documents. One person said she brought all three of her ID documents to the BOP facility for her 1-year sentence. However, they were no longer in her central file when she was transferred to the

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<sup>3</sup>According to BOP officials, BOP establishes the identity of a newly-incarcerated person based on information provided in the U.S. Marshals Service and U.S. Probation Office's Presentence Investigation Report and other documentation provided upon arrival at a facility.

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**Appendix II: Summary of Interviews with Formerly Incarcerated People Regarding Federal Bureau of Prisons (BOP) Assistance in Obtaining Identification (ID) Documents**

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Residential Reentry Center (RRC). One person only provided photocopies of her ID documents to BOP as she had heard “horror stories” about key documents being lost at BOP facilities. This sentiment was echoed by another person, who stated she did not trust BOP staff and was nervous to have her original Social Security card at the facility.

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## RRC Assistance

Seven of the people we spoke with were released to an RRC<sup>4</sup> and provided their perspectives.<sup>5</sup> One person stated that although she had a valid photo ID when she was released to the RRC, it was from a different state than the RRC. To obtain employment in that state, she had to apply for a photo ID in the state of the RRC.

These people generally reported that they had to seek permission from the RRCs to obtain these documents on their own, and that often, this could be challenging. For example, people we interviewed provided the following experiences.

- One person we spoke with stated that, when obtaining permission from the RRC staff to leave to attend to personal business, she had to provide staff with a phone number of where she would be. However, she said when she tried to get permission to go to the Department of Motor Vehicles (DMV) to obtain her license, she was unable to provide a specific name and point-of-contact at the DMV. She ultimately had to wait until she was on home confinement, with the assistance of her family instead of the RRC.
- One person stated that the RRC granted him permission to attend to personal business, such as obtaining an ID, but it created a lot of

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<sup>4</sup>As discussed earlier, BOP contracts with RRCs, also known as halfway houses, to provide assistance to people in the form of employment counseling, job placement, financial management assistance, and other services in a structured and supervised environment. As part of these responsibilities, RRCs are to determine if incoming residents possess a birth certificate or state-issued photo ID card. If the residents do not possess such documents, the RRC is to assist and facilitate the process of obtaining them.

<sup>5</sup>Seven of the eight people we spoke with stated that they were released to an RRC. An eighth person, who was released on parole in 2011, stated that she was released to a “federal reentry sanction center.” She described the center as serving similar functions to an RRC, but noted that it was not called an RRC. For our purposes, we exclude her responses as being released to an RRC.

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**Appendix II: Summary of Interviews with Formerly Incarcerated People Regarding Federal Bureau of Prisons (BOP) Assistance in Obtaining Identification (ID) Documents**

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anxiety for him because he was only provided with a small window of time and was worried he might not be able to return to the RRC within his allotted time.

- One person, who told us that her BOP facility lost all three of her ID documents, stated that the RRC denied her request to go to the DMV to obtain a new photo ID documents. She said the DMV was more than an hour away from the RRC. Because she could not provide the RRC with an estimate of how long she would be gone, staff would not give her permission.
- Another person stated that he would complete a request form for the RRC to leave on personal business, which would include the date he was requesting. However, the form was often not viewed until after the date he was requesting. He said he was granted 2 hours of leave to obtain his driver's license. However, he was not back in time and got written up for being late, because he was still waiting in line at the DMV.

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## **Challenges Formerly Incarcerated People Face When ID Documents Are Not Available**

The people that we spoke with, all of whom now work in the field of reentry, spoke of their personal experiences and challenges related to not having ID documents, as well as the challenges faced by others they work with in reentry. One person spoke of her own personal experience while residing at an RRC. She said she was not able to open a bank account or obtain a cell phone because she did not have a photo ID. She stated that this made it difficult to cash checks, which she needed so she could pay the required portion of her income to the RRC. The RRC suggested that she obtain a library card as a form of ID, but she was not able to obtain one because she was not considered a resident of the jurisdiction. She instead paid the RRC using cashier's checks, which required her to obtain permission from the RRC to leave the premises.

Another person mentioned similar barriers that people may face related to not having ID documents—including difficulties obtaining a cell phone and opening a bank account—as well as obtaining employment. Another person, who had a photo ID, noted that a social program he was trying to qualify for required his photo ID, and that if he had not had one, he would not have qualified. Another person noted that, without the photo ID, she was unable to apply for a job.

## Appendix III: Additional Data on Identification (ID) Documents Received by Incarcerated People

Table 3 provides a breakout of the number and percentage of people released from Federal Bureau of Prisons (BOP) facilities with ID documents, broken down by demographic factors such as gender, race, ethnicity, and veteran status.

**Table 3: Number and Percentage of People Released from Federal Bureau of Prisons (BOP) Facilities with Identification (ID) Documents, By Demographic Information, Calendar Years 2018 through 2021**

Demographics category	Demographics subcategory	Social Security Card		Birth Certificate		Photo ID	
		Percentage	Number	Percentage	Number	Percentage	Number
Gender	Male	42%	53,466	17%	22,396	23%	29,835
Gender	Female	42%	7,484	20%	3,476	30%	5,363
Race	Asian	42%	960	17%	395	39%	900
Race	Black	41%	25,441	17%	10,292	22%	13,916
Race	Native American	36%	1,770	9%	455	13%	660
Race	White	43%	32,779	19%	14,730	26%	19,722
Ethnicity	Hispanic	39%	12,407	17%	5,297	24%	7,488
Ethnicity	Non-Hispanic	42%	48,543	18%	20,575	24%	27,710
Veteran Status	Non-Veteran	46%	57,428	19%	24,207	26%	33,106
Veteran Status	Veteran	55%	2,869	28%	1,460	35%	1,828

Source: GAO analysis of BOP data. | GAO-23-105302

Notes: Data include convicted and sentenced U.S. citizens. We examined records for 146,565 incarcerated people released from BOP facilities from 2018 through 2021. For people who were incarcerated more than once during this time period, we analyzed their ID status from their most recent incarceration. We were unable to determine the ID status for certain individuals because BOP's data did not contain information on the individual's ID status, including 15,252 individuals for Social Security cards, 15,719 individuals for birth certificates, and 14,659 individuals for photo IDs. BOP officials told us that the entries might not contain a status due to the incremental rollout of the data fields at BOP facilities in 2018 (not all facilities had these data fields available until April 2018), and because completing these data fields is not required by policy. We also could not determine the ID status for additional people because the ID information was recorded for these people outside of their incarceration dates—623 people for Social Security card entries, 625 people for birth certificate entries, and 589 people for photo ID entries. BOP officials told us that this might happen when people are not released at the end of their sentence, which can occur when there is a pending court case, among other things.

We conducted a regression analysis of a subset of this population using multivariate statistical methods to estimate the probability of release from



**Appendix III: Additional Data on Identification  
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a BOP facility with an ID document while holding certain facility and individual characteristics constant.<sup>1</sup> Results of this regression analysis illustrate the probability of certain people possessing an ID document upon release from a BOP facility, as shown in table 4. For example, the first row of the table shows that, when controlling for other factors, the probability of an Asian person who was initially recorded by BOP as not having a birth certificate being released from a BOP facility with a birth certificate is approximately 11.1 percent.

**Table 4: Probability of People Who Were Initially Recorded as Not Having an Identification (ID) Document Being Released from a Federal Bureau of Prisons (BOP) Facility with an ID Document, by Demographic Information, Calendar Years 2018 through 2021**

ID Document	Individual Characteristics (category)	Individual Characteristics (subcategory)	Probability, %	Margin of Error
Birth Certificate	Race	Asian	11.08	1.56
Birth Certificate	Race	Black	10.06	0.31
Birth Certificate	Race	Native American	8.88	1.12
Birth Certificate	Race	White	12.66	0.31
Birth Certificate	Ethnicity	Hispanic	10.7	0.45
Birth Certificate	Ethnicity	Non-Hispanic	11.61	0.24
Birth Certificate	Gender	Female	12.94	0.64
Birth Certificate	Gender	Male	11.16	0.22
Birth Certificate	Veteran Status	Non-Veteran	11.3	0.2
Birth Certificate	Veteran Status	Veteran	13.42	1.02
Birth Certificate	Person's security level, last BOP facility	Administrative security	11.36	0.83
Birth Certificate	Person's security level, last BOP facility	High security	4.53	0.43
Birth Certificate	Person's security level, last BOP facility	Low security	14.09	0.47
Birth Certificate	Person's security level, last BOP facility	Medium security	8.91	0.32
Birth Certificate	Person's security level, last BOP facility	Minimum security	28.25	1.49
Birth Certificate	Person's length of incarceration <sup>a</sup>	Incarceration length, first quartile	5.71	0.3

Person's length of incarceration<sup>a</sup>

<sup>1</sup>See appendix I for a detailed description of our approach to the regression analysis, including the population subset used and variables involved.

**Appendix III: Additional Data on Identification  
(ID) Documents Received by Incarcerated  
People**

<b>ID Document</b>	<b>Individual Characteristics (category)</b>	<b>Individual Characteristics (subcategory)</b>	<b>Probability, %</b>	<b>Margin of Error</b>
<b>Birth Certificate</b>	Person's length of incarceration <sup>a</sup>	Incarceration length, second quartile	10.6	0.38
<b>Birth Certificate</b>	Person's length of incarceration <sup>a</sup>	Incarceration length, third quartile	13.75	0.43
<b>Birth Certificate</b>	Person's length of incarceration <sup>a</sup>	Incarceration length, fourth quartile	15.57	0.48
<b>Social Security Card</b>	Race	Asian	29.07	2.46
<b>Social Security Card</b>	Race	Black	29.03	0.52
<b>Social Security Card</b>	Race	Native American	28.36	1.72
<b>Social Security Card</b>	Race	White	32.32	0.48
<b>Social Security Card</b>	Ethnicity	Hispanic	28.49	0.71
<b>Social Security Card</b>	Ethnicity	Non-Hispanic	31.45	0.38
<b>Social Security Card</b>	Gender	Female	36.61	1.03
<b>Social Security Card</b>	Gender	Male	29.89	0.34
<b>Social Security Card</b>	Veteran Status	Non-Veteran	30.7	0.32
<b>Social Security Card</b>	Veteran Status	Veteran	31.54	1.66
<b>Social Security Card</b>	Person's security level, last BOP facility	Administrative security	31.02	1.28
<b>Social Security Card</b>	Person's security level, last BOP facility	High security	24.88	0.97
<b>Social Security Card</b>	Person's security level, last BOP facility	Low security	33.22	0.67
<b>Social Security Card</b>	Person's security level, last BOP facility	Medium security	28.59	0.54
<b>Social Security Card</b>	Person's security level, last BOP facility	Minimum security	43.86	1.65
<b>Social Security Card</b>	Person's length of incarceration <sup>a</sup>	Incarceration length, first quartile	18.57	0.55
<b>Social Security Card</b>	Person's length of incarceration <sup>a</sup>	Incarceration length, second quartile	29.16	0.63
<b>Social Security Card</b>	Person's length of incarceration <sup>a</sup>	Incarceration length, third quartile	37.24	0.67
<b>Social Security Card</b>	Person's length of incarceration <sup>a</sup>	Incarceration length, fourth quartile	38.24	0.69
<b>State-Issued Photo ID</b>	Race	Asian	17.39	2.14
<b>State-Issued Photo ID</b>	Race	Black	10.22	0.34
<b>State-Issued Photo ID</b>	Race	Native American	7.99	1.04

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People**

<b>ID Document</b>	<b>Individual Characteristics (category)</b>	<b>Individual Characteristics (subcategory)</b>	<b>Probability, %</b>	<b>Margin of Error</b>
<b>State-Issued Photo ID</b>	Race	White	11.66	0.31
<b>State-Issued Photo ID</b>	Ethnicity	Hispanic	11.52	0.48
<b>State-Issued Photo ID</b>	Ethnicity	Non-Hispanic	10.88	0.25
<b>State-Issued Photo ID</b>	Gender	Female	14.09	0.74
<b>State-Issued Photo ID</b>	Gender	Male	10.6	0.22
<b>State-Issued Photo ID</b>	Veteran Status	Non-Veteran	10.93	0.21
<b>State-Issued Photo ID</b>	Veteran Status	Veteran	13.75	1.16
<b>State-Issued Photo ID</b>	Person's security level, last BOP facility	Administrative security	10.21	0.74
<b>State-Issued Photo ID</b>	Person's security level, last BOP facility	High security	10.14	0.68
<b>State-Issued Photo ID</b>	Person's security level, last BOP facility	Low security	10.74	0.4
<b>State-Issued Photo ID</b>	Person's security level, last BOP facility	Medium security	10.1	0.36
<b>State-Issued Photo ID</b>	Person's security level, last BOP facility	Minimum security	25.36	1.6
<b>State-Issued Photo ID</b>	Person's length of incarceration <sup>a</sup>	Incarceration length, first quartile	8.83	0.38
<b>State-Issued Photo ID</b>	Person's length of incarceration <sup>a</sup>	Incarceration length, second quartile	13.46	0.45
<b>State-Issued Photo ID</b>	Person's length of incarceration <sup>a</sup>	Incarceration length, third quartile	12.35	0.44
<b>State-Issued Photo ID</b>	Person's length of incarceration <sup>a</sup>	Incarceration length, fourth quartile	9.43	0.4

Source: GAO analysis of BOP data. | GAO-23-105302

Notes: Only people with incarceration lengths 6 months or longer were included in this analysis.

<sup>a</sup>Quartiles were determined by splitting the distribution of people's incarceration lengths by ID document into four equal categories.

In addition, as part of our regression analysis we calculated odds ratios, as shown in table 5 below. Odds ratios are a measure of association between two variables. They estimate how much more likely or unlikely (in terms of odds) it is for the outcome to be present among subjects in populations that differ by a characteristic. For example, the odds of a white incarcerated person being released with a birth certificate are 1.32

**Appendix III: Additional Data on Identification (ID) Documents Received by Incarcerated People**

times the odds of a black incarcerated person among those incarcerated people who did not initially have a birth certificate. In other words, white people were 1.32 times as likely as black people to be released with a birth certificate that was obtained during incarceration.

**Table 5: Odds Ratios Comparing Likelihood of People Initially Recorded as Not Having an Identification (ID) Document Being Released from a Federal Bureau of Prisons (BOP) Facility with Identification Documents, among Demographic Groups, Calendar Years 2018 through 2021**

ID Document	Individual Characteristics	Comparison of People	Odds Ratio	Margin of Error
Birth Certificate	Race	White relative to Black	1.32*	0.07
Birth Certificate	Race	White relative to Asian	1.18	0.2
Birth Certificate	Race	White relative to Native American	1.53*	0.23
Birth Certificate	Race	Black relative to Asian	0.89	0.16
Birth Certificate	Race	Black relative to Native American	1.16	0.18
Birth Certificate	Race	Asian relative to Native American	1.3*	0.29
Birth Certificate	Ethnicity	Hispanic relative to non-Hispanic	0.91*	0.05
Birth Certificate	Gender	Males relative to females	0.83*	0.06
Birth Certificate	Veterans Status	Veterans relative to non-veterans	1.24*	0.12
Birth Certificate	Person's security level, last BOP facility	Minimum security relative to low security	2.56*	0.23
Birth Certificate	Person's security level, last BOP facility	Low security relative to medium security	1.72*	0.11
Birth Certificate	Person's security level, last BOP facility	Medium security relative to high security	2.1*	0.23
Birth Certificate	Person's security level, last BOP facility	Administrative security relative to minimum security	0.3*	0.04
Birth Certificate	Person's length of incarceration <sup>a</sup>	1st quartile sentence length relative to 2nd quartile sentence length	0.5*	0.04
Birth Certificate	Person's length of incarceration <sup>a</sup>	2nd quartile sentence length relative to 3rd quartile sentence length	0.73*	0.04
Birth Certificate	Person's length of incarceration <sup>a</sup>	3rd quartile sentence length relative to 4th quartile sentence length	0.86*	0.05
Social Security Card	Race	White relative to Black	1.19*	0.05
Social Security Card	Race	White relative to Asian	1.18*	0.16
Social Security Card	Race	White relative to Native American	1.23*	0.12
Social Security Card	Race	Black relative to Asian	1	0.13

**Appendix III: Additional Data on Identification  
(ID) Documents Received by Incarcerated  
People**

<b>ID Document</b>	<b>Individual Characteristics</b>	<b>Comparison of People</b>	<b>Odds Ratio</b>	<b>Margin of Error</b>
<b>Social Security Card</b>	Race	Black relative to Native American	1.04	0.1
<b>Social Security Card</b>	Race	Asian relative to Native American	1.04	0.17
<b>Social Security Card</b>	Ethnicity	Hispanic relative to non-Hispanic	0.86*	0.04
<b>Social Security Card</b>	Gender	Males relative to females	0.72*	0.04
<b>Social Security Card</b>	Veterans Status	Veterans relative to non-veterans	1.04	0.09
<b>Social Security Card</b>	Person's security level, last BOP facility	Minimum security relative to low security	1.65*	0.13
<b>Social Security Card</b>	Person's security level, last BOP facility	Low security relative to medium security	1.27*	0.06
<b>Social Security Card</b>	Person's security level, last BOP facility	Medium security relative to high security	1.23*	0.08
<b>Social Security Card</b>	Person's security level, last BOP facility	Administrative security relative to minimum Security	0.54*	0.05
<b>Social Security Card</b>	Person's length of incarceration <sup>a</sup>	1st quartile sentence length relative to 2nd quartile sentence length	0.53*	0.03
<b>Social Security Card</b>	Person's length of incarceration <sup>a</sup>	2nd quartile sentence length relative to 3rd quartile sentence length	0.67*	0.03
<b>Social Security Card</b>	Person's length of incarceration <sup>a</sup>	3rd quartile sentence length relative to 4th quartile sentence length	0.96*	0.04
<b>State-issued photo ID</b>	Race	White relative to Black	1.17*	0.06
<b>State-issued photo ID</b>	Race	White relative to Asian	0.61*	0.1
<b>State-issued photo ID</b>	Race	White relative to Native American	1.55*	0.23
<b>State-issued photo ID</b>	Race	Black relative to Asian	0.52*	0.09
<b>State-issued photo ID</b>	Race	Black relative to Native American	1.33*	0.2
<b>State-issued photo ID</b>	Race	Asian relative to Native American	2.55*	0.55
<b>State-issued photo ID</b>	Ethnicity	Hispanic relative to non-Hispanic	1.07*	0.06
<b>State-issued photo ID</b>	Gender	Males relative to females	0.71*	0.05
<b>State-issued photo ID</b>	Veterans Status	Veterans relative to non-veterans	1.32*	0.14

**Appendix III: Additional Data on Identification  
(ID) Documents Received by Incarcerated  
People**

<b>ID Document</b>	<b>Individual Characteristics</b>	<b>Comparison of People</b>	<b>Odds Ratio</b>	<b>Margin of Error</b>
<b>State-issued photo ID</b>	Person's security level, last BOP facility	Minimum security relative to low security	3.02*	0.31
<b>State-issued photo ID</b>	Person's security level, last BOP facility	Low security relative to medium security	1.07*	0.07
<b>State-issued photo ID</b>	Person's security level, last BOP facility	Medium security relative to high security	1	0.09
<b>State-issued photo ID</b>	Person's security level, last BOP facility	Administrative security relative to minimum Security	0.31*	0.04
<b>State-issued photo ID</b>	Person's length of incarceration <sup>a</sup>	1st quartile sentence length relative to 2nd quartile sentence length	0.61*	0.04
<b>State-issued photo ID</b>	Person's length of incarceration <sup>a</sup>	2nd quartile sentence length relative to 3rd quartile sentence length	1.11*	0.07
<b>State-issued photo ID</b>	Person's length of incarceration <sup>a</sup>	3rd quartile sentence length relative to 4th quartile sentence length	1.37*	0.09

Legend: \* = statistically significant at a p-value of .05

Source: GAO analysis of BOP data. | GAO-23-105302

Notes: Only people with incarceration lengths 6 months or longer were included in this analysis.

<sup>a</sup>Quartiles were determined by splitting the distribution of people's incarceration lengths by ID document into four equal categories.

## Appendix IV: Selected States' Approaches to Assisting Incarcerated People with Obtaining Identification (ID) Documents

This appendix provides an overview of each of the six states' processes for assisting people with obtaining birth certificates, Social Security cards, and state-issued photo IDs.<sup>1</sup>

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### Colorado

Pursuant to state law, the Colorado Department of Corrections (DOC) is to collaborate with the Department of Revenue, which houses the Division of Motor Vehicles (DMV), to operate a program to procure state-issued identification (ID) cards for incarcerated people.<sup>2</sup> In 2014, the DMV began operating fully functioning offices at two DOC facilities; one dedicated to processing newly incarcerated people upon intake, and the other for preparing people for release. See figure 12 for an illustration of this process.

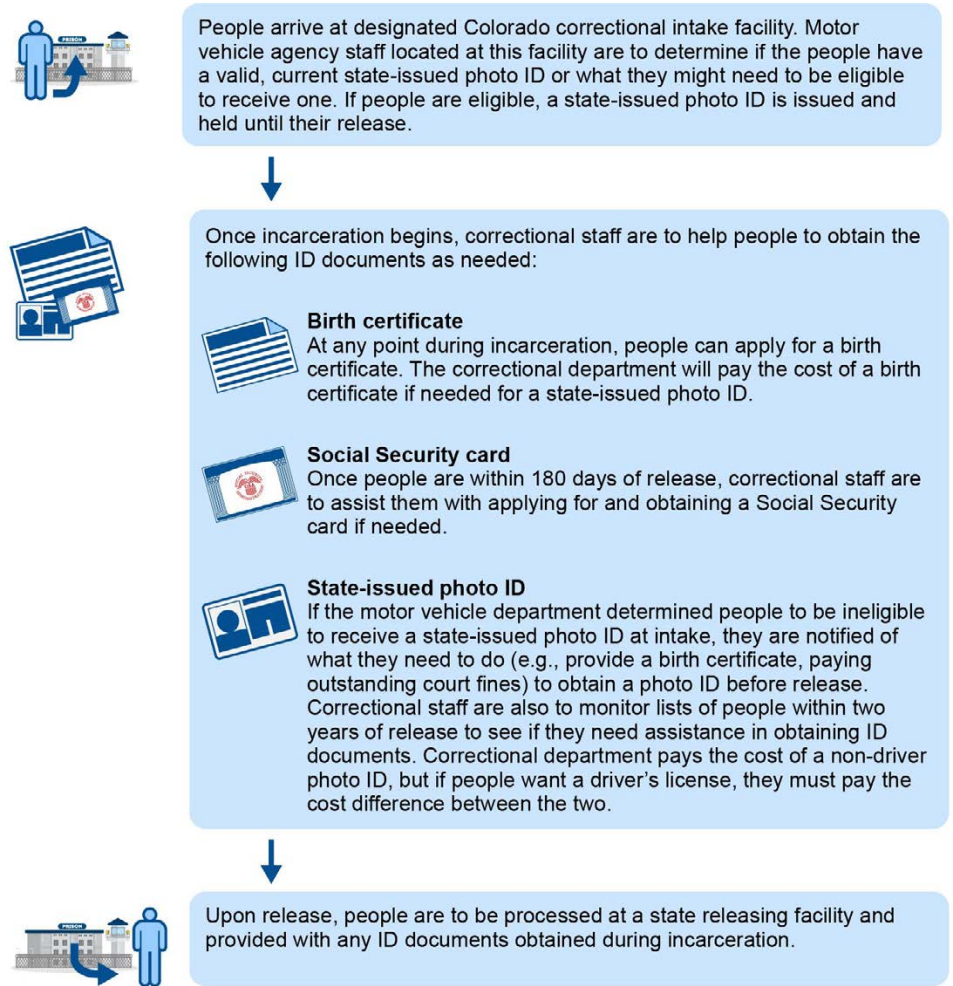
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<sup>1</sup>We conducted these case studies to provide examples of how some states assist incarcerated people with obtaining ID documents in their respective states.

<sup>2</sup>Colo. Rev. Stat. § 17-33-102.

**Appendix IV: Selected States' Approaches to Assisting Incarcerated People with Obtaining Identification (ID) Documents**

**Figure 12: Colorado Process for Issuing Identification (ID) Documents to Incarcerated People**



Source: Colorado Department of Corrections; artinspring/stock.adobe.com. | GAO-23-105302

**Birth Certificates and Social Security Cards.** According to state officials, the DOC will assist people with obtaining a birth certificate and Social Security card. The DOC is to work with state and county vital statistics offices when applying for birth certificates for people who were born in Colorado or elsewhere. Incarcerated people can apply for a birth certificate at any time during their incarceration, or a Social Security card within 180 days of release, per the DOC’s memorandum of understanding (MOU) with the Social Security Administration (SSA).



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**Appendix IV: Selected States' Approaches to Assisting Incarcerated People with Obtaining Identification (ID) Documents**

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All ID documents obtained are to be held for people in a central ID bank until release.

**State Issued Photo IDs.** If a person is eligible for a state-issued photo ID at intake, the DMV staff will create a photo ID for the person, which staff are to hold in a DOC ID bank until the person is released.<sup>3</sup> The state only issues REAL ID compliant documents to U.S. citizens and permanent lawful residents.<sup>4</sup> DOC officials are to provide ineligible people with information on what actions they need to take to get a state-issued photo ID. All eligible people nearing release who did not previously obtain a photo ID are to be transported to one of the two DOC facilities with DMV offices or a community-based DMV to have a photo ID issued. State officials stated that they are piloting a mobile DMV unit that will allow the DMV to take equipment to each correctional facility, rather than transporting the person to the prison facilities with DMV offices for ID processing.

Officials from the Colorado DOC and DMV stated that the process has been highly successful since it was implemented in 2014. Currently, the state reports that in the final 6 months of 2021, 75 percent of people receive a state-issued ID card at release.

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## Florida

Generally, Florida law requires the Florida Department of Corrections (FDC) to work in conjunction with the Florida Department of Health and Florida Department of Highway Safety and Motor Vehicles (FLHSMV) to provide all Florida-born incarcerated people with a certified copy of their

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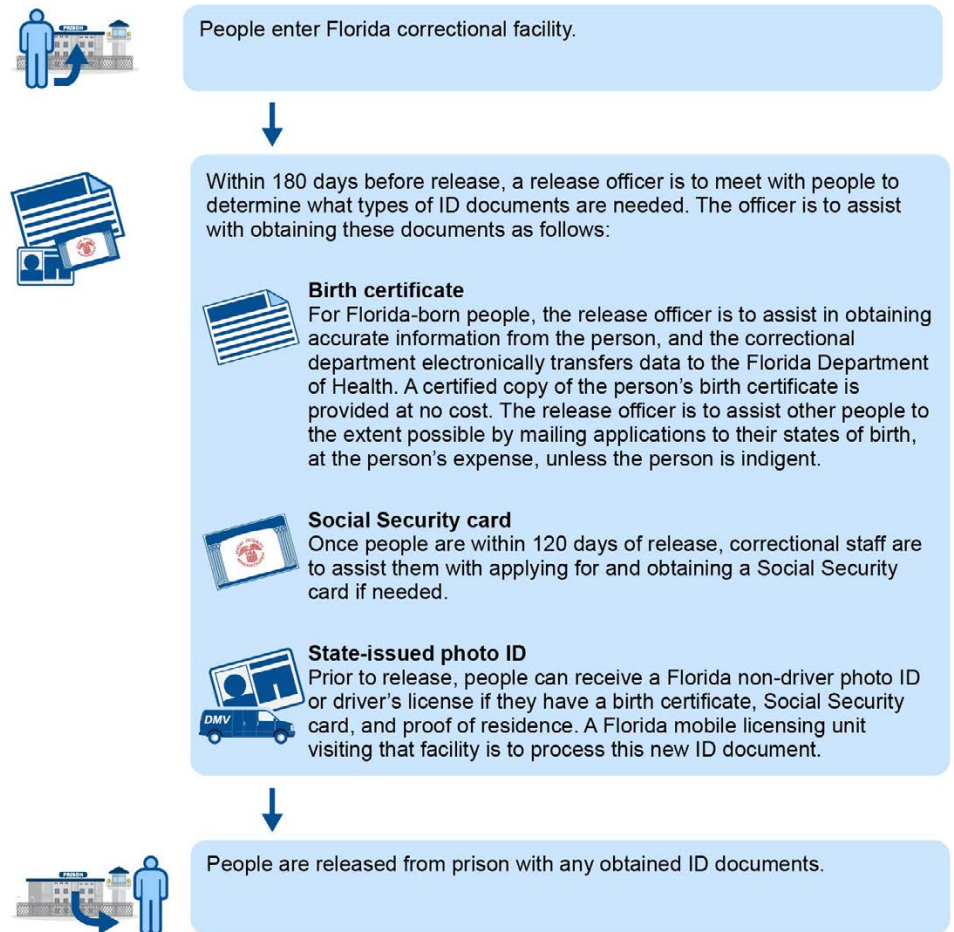
<sup>3</sup>In addition, people who were incarcerated before the current initial intake process can also obtain state-issued ID. In this case, DOC pulls lists of people who are within 2 years of release and will help these people obtain an ID prior to being released from prison.

<sup>4</sup>The REAL ID Act of 2005, Pub. L. No. 109-13, 119 Stat. 302, establishes minimum security standards for license issuance and production and prohibits certain federal agencies from accepting for certain purposes driver's licenses and identification cards from states not meeting the Act's minimum standards. The official purposes covered by the Act include, but are not limited to, accessing certain federal facilities, boarding federally regulated commercial aircraft, entering nuclear power plants, and any other purposes determined by the Secretary of Homeland Security. Pub. L. No. 109-13, § 201, 119 Stat. 302, 311-12 (2005)(See 49 U.S.C. § 30301 note). The Department of Homeland Security implemented a phased enforcement plan for the REAL ID Act and has declared that as of May 3, 2023, U.S. travelers must be REAL ID compliant to board domestic flights and access certain federal facilities.

**Appendix IV: Selected States' Approaches to Assisting Incarcerated People with Obtaining Identification (ID) Documents**

birth certificate and a state-issued photo ID before a person's release upon expiration of their sentence.<sup>5</sup> A replacement driver's license will be provided in lieu of a non-driver photo ID card when an incarcerated person has a valid state driver's license issued by FLHSMV that was lost, stolen, or destroyed. The FDC assigns people to a "release officer" when they are within 180 days of expected release from prison to assist people with establishing an ID plan based on their needs. See figure 13 for an illustration of this process.

**Figure 13: Florida Process for Issuing Identification (ID) Documents to Incarcerated People**



Source: Florida Department of Corrections and Department of Highway Safety and Motor Vehicles; artinspring/stock.adobe.com. | GAO-23-105302

<sup>5</sup>Fla. Stat. § 944.605(7).

**Birth Certificates and Social Security Cards.** For those Florida-born people that need a birth certificate and are within 180 days of release, FDC staff electronically submit information to the Department of Health once a month. The Department of Health is to review people's documents and information, and if eligible, mail the birth certificate to the FDC facility for safekeeping at no cost. FDC officials stated that they also assist incarcerated people who are not Florida-born in obtaining birth certificates from other states to the extent possible. FDC will pay for an out-of-state birth certificate if a person is indigent.

The FDC also has an MOU with SSA allowing people to apply for a Social Security card within 120 days of release.

**State Issued Photo IDs.** FDC works with the FLHSMV to assist people with obtaining state-issued ID through the Florida Licensing on Wheels mobile unit. FDC staff are to coordinate with FLHSMV to schedule visits to the facilities to assist eligible people with obtaining a state-issued photo ID. The mobile unit includes FLHSMV staff that travel to various sites, including FDC facilities, across the state to provide mobile licensing services. Prior to the visit, release officers are to provide the mobile unit staff with the number of participants that are eligible to receive a photo ID. While at the facility, FLHSMV staff are to review these people's documents to determine eligibility.

Once the mobile unit is onsite, FDC release officers give the mobile unit staff information packets for each person that includes their documents. Those deemed eligible are processed for a REAL ID compliant credential that is printed onsite, placed in the packet, and returned to the release officer for safekeeping. The credential could be a non-driver photo ID or, if the person currently holds a valid Florida driver's license, a driver's license replacement.<sup>6</sup> FLHSMV pays for all state-issued photo ID costs for people in Florida state prisons.

FLHSMV officials we spoke to said that the mobile unit has been in existence and serving FDC's incarcerated people since 2014. These officials added that the process has been very successful, with the exception of the COVID-19 pandemic. Prior to the pandemic,

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<sup>6</sup>The state of Florida also has an MOU in place with the federal Bureau of Prisons (BOP) that allows the mobile unit to assist people incarcerated in BOP facilities with obtaining state-issued photo IDs in a very similar manner by traveling to BOP facilities throughout the state.

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**Appendix IV: Selected States' Approaches to  
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approximately 88 percent of people incarcerated at FDC facilities were released from prison with a state-issued photo ID.

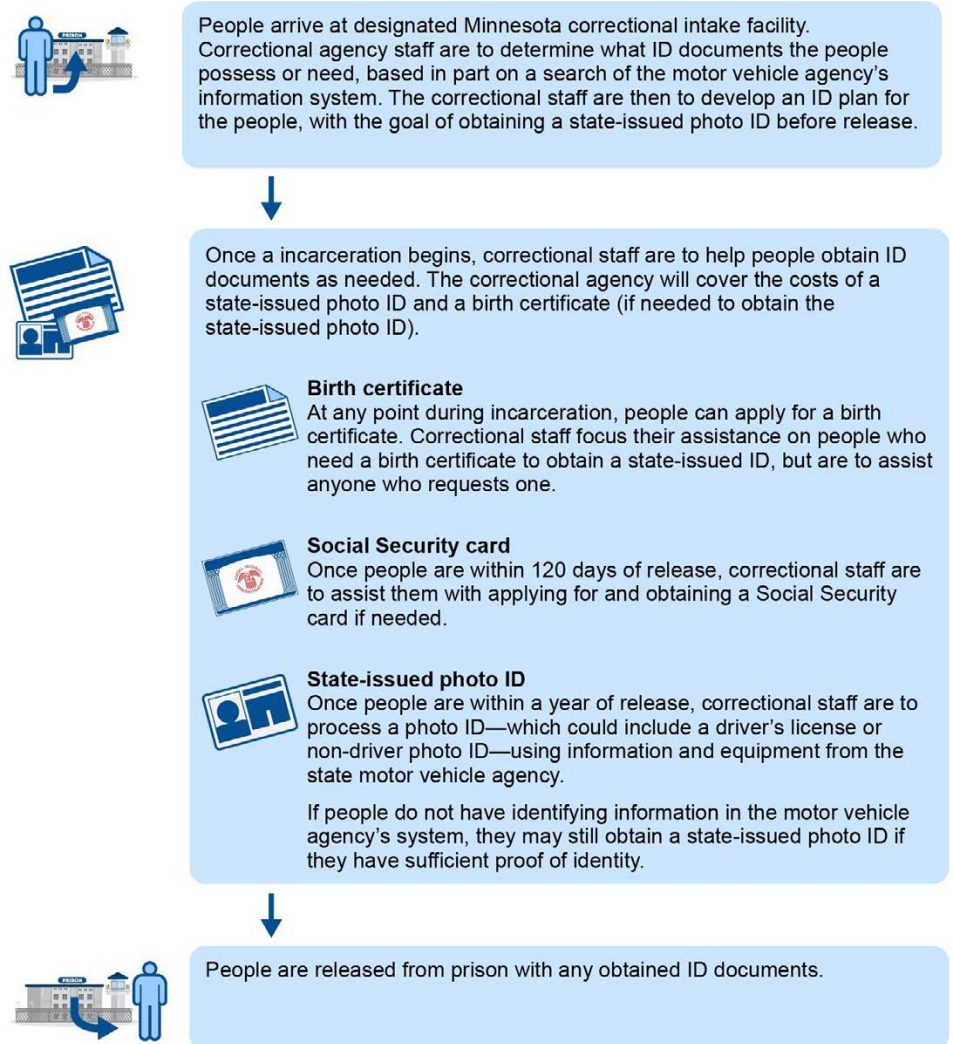
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## **Minnesota**

The Minnesota DOC and Driver and Vehicle Services (DVS) have an interagency agreement that allows DOC staff to house and operate DVS equipment at all the state's DOC facilities in order to issue state-issued photo IDs to incarcerated people. See figure 14 for an illustration of this process.

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Figure 14: Minnesota Process for Issuing Identification (ID) Documents to Incarcerated People



Source: Minnesota Department of Corrections; artinspring/stock.adobe.com. | GAO-23-105302

**Birth Certificates and Social Security Cards.** DOC case managers will assist people who do not have a valid record on file with DVS with obtaining a birth certificate at any time during their incarceration. The officials we spoke to stated that DOC used to assist all people with obtaining birth certificates, but they found that while helpful, not all people needed them, and a state-issued ID was more beneficial to reentry needs. However, DOC staff will assist a person with obtaining a birth certificate if they want one.

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**Appendix IV: Selected States' Approaches to Assisting Incarcerated People with Obtaining Identification (ID) Documents**

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In addition, the DOC has an MOU with the SSA allowing individuals to apply for a Social Security card if they are within 120 days of release from prison. Once the DOC receives a birth certificate or Social Security card at the DOC facility, the records department is to hold the document until the person is released.

**State Issued Photo IDs.** In accordance with the DOC and DVS interagency agreement, once people are within 1 year of release, DOC staff are to place them on a roster to be processed for a state-issued ID. According to state officials, the designated DOC staff will review the person's DVS record, take a new photo, and process the proper document using DVS equipment and systems. DOC processes driver's license renewals, duplicates (if original is still valid), non-driver photo ID cards, and driving permits.<sup>7</sup> These state-issued photo IDs are not REAL ID compliant. People who do not have a DVS record can still obtain a state-issued photo ID if they have one primary and one secondary ID document; for example, a birth certificate and Social Security card. According to state officials, this process began with DVS staff initially traveling to process the photo IDs at DOC facilities on designated days. Now, DOC-designated staff have been trained to process them without the presence of DVS staff.

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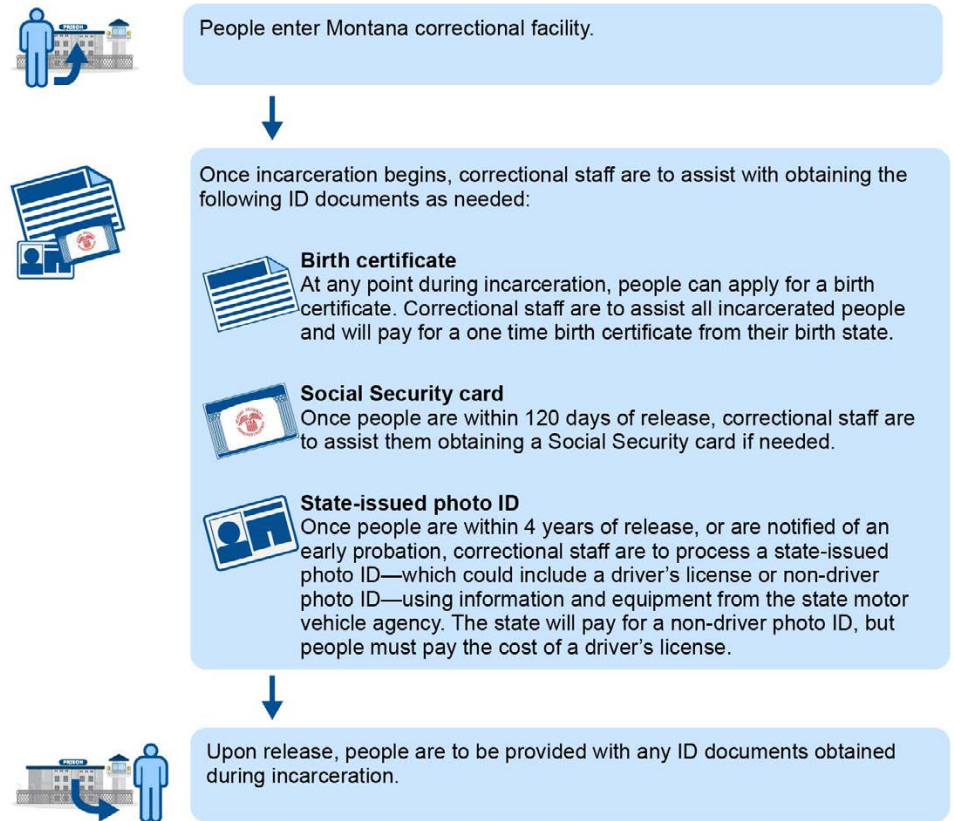
## Montana

An MOU exists between the Montana DOC and the Montana Department of Justice, Motor Vehicle Division (MVD). The MOU allows specially trained DOC staff to use MVD equipment at all 11 DOC facilities statewide to process state-issued photo IDs for eligible incarcerated people. See figure 15 for an illustration of this process.

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<sup>7</sup>People can take knowledge tests for the driving permit, but actual driving tests are not available.

Figure 15: Montana Process for Issuing Identification (ID) Documents to Incarcerated People



Source: Montana Department of Corrections; artinspring/stock.adobe.com. | GAO-23-105302

**Birth Certificates and Social Security Cards.** According to DOC officials, reentry services personnel are to assist incarcerated people in obtaining birth certificates and Social Security cards at the request of the person. These officials stated that Montana-born people receive their documents quickly, while people born in other states usually take longer. DOC has an MOU in place with SSA that allows people to apply for a Social Security card within 120 days of release. Once birth certificates and Social Security cards are received, DOC staff are to keep the documents in the person's file until release.

**State-Issued Photo IDs.** According to state officials, beginning in 2008, Montana DOC employees began assisting incarcerated people with obtaining a non-driver photo ID. DOC officials stated that around 2011, the agency began making efforts to comply with the REAL ID Act, which required applicants for a non-driver photo ID or driver's license to prove

identity and authorized presence in the U.S.<sup>8</sup> DOC officials stated that since then, they have increased their assistance to incarcerated people with obtaining certified birth certificates.

According to DOC officials, for a non-driver photo ID or driver's license renewal, DOC staff are to review qualifying identity documents and enter people's information into the MVD system, take a photo and signature, and submit the application to MVD for processing. To obtain a new driver's license, applications are first to be screened for qualifying impediments, such as suspensions, past fines, or fees. Once these impediments are cleared, people can then take the written driver's test and actual driving test, in some circumstances. For people who cannot obtain a state-issued photo ID, the DOC may provide them with a prison-issued ID document so that the person is released with some form of identification.

DOC officials we spoke with believe their processes in assisting people with obtaining ID documents have generally been successful, stating that they have assisted with about 5,000 birth certificates from 2008 through 2021. According to DOC, in 2021 the agency helped people obtain 189 birth certificates, 203 Social Security cards, 820 non-driver photo IDs, 117 driver's licenses, and 24 commercial driver's licenses.

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## Ohio

The Ohio Department of Rehabilitation and Correction (ODRC)—the state's correctional agency—has a policy in place stating that ODRC must provide an “offender release card” to eligible incarcerated people upon release from state prison.<sup>9</sup> After their release from the ORDC, people can exchange this card for a state-issued photo ID card at the state's motor vehicle agency, the Bureau of Motor Vehicles (BMV). See figure 16 for an illustration of this process.

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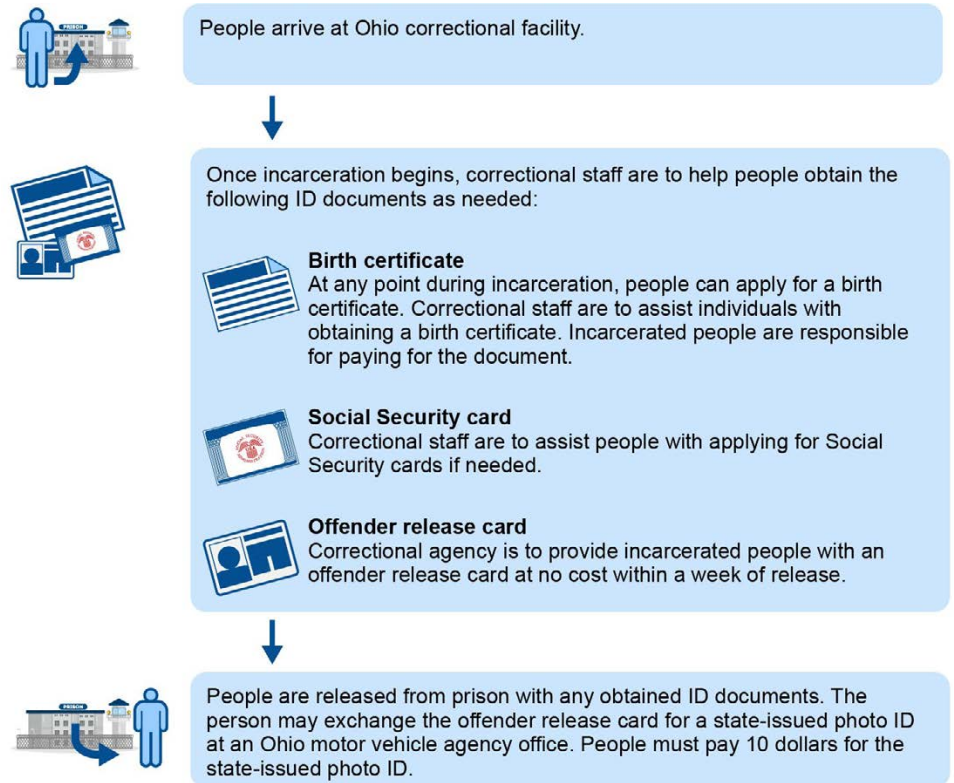
<sup>8</sup>See Pub. L. No. 109-13, § 202, 119 Stat. 302, 312-15 (2005) (See 49 U.S.C. § 30301 note).

<sup>9</sup>ODRC policy 78-REL-02 (Revised September 1, 2021) “Release Card for Incarcerated Individuals,” states that all eligible incarcerated people will be provided a release card upon release from an ODRC facility to assist the returned citizen with an acceptable and recognizable form of identification.



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Figure 16: Ohio Process for Issuing Identification (ID) Documents to Incarcerated People



Source: Ohio Department of Rehabilitation and Correction; artinspring/stock.adobe.com. | GAO-23-105302

**Birth Certificates and Social Security Cards.** According to ODRC officials, facility staff assist incarcerated people with obtaining birth certificates and Social Security cards upon request. Most people who choose to obtain a birth certificate are responsible for paying the costs, unless they take part in a prison work program for which they may need a driver's license. ODRC will then cover the birth certificate cost. ODRC case managers can also assist people with obtaining Social Security cards if needed.

**State-Issued Photo IDs.** All eligible incarcerated people are to be issued an offender release card about 1 week before release. The card can be exchanged for a state-issued photo ID upon release, for a fee. People have 120 days from the time of their release to exchange the release card

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**Appendix IV: Selected States' Approaches to  
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for a state-issued photo ID at a BMV location.<sup>10</sup> BMV officials informed us that in 2017, the BMV broadened this ID exchange process to include former federally incarcerated people who fall under the jurisdiction of the U.S. Probation Office's Northern and Southern Districts of Ohio. The U.S. Probation Office worked with the BMV to design an Offender Release Card similar to the one state incarcerated people receive.

ODRC and BMV officials we met with said their processes have worked well. In addition, the ODRC and the BMV are planning to implement a joint process that will provide people with a state-issued photo ID before release.

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## Virginia

Under Virginia law, generally, the DOC is required to assist people with obtaining ID documents.<sup>11</sup> To accomplish this, the Virginia DOC has an MOU with the DMV that allows the state's "DMV Connect" unit, a mobile licensing unit, to process state-issued photo IDs for people incarcerated at DOC facilities across the state. See figure 17 below for an illustration of this process.

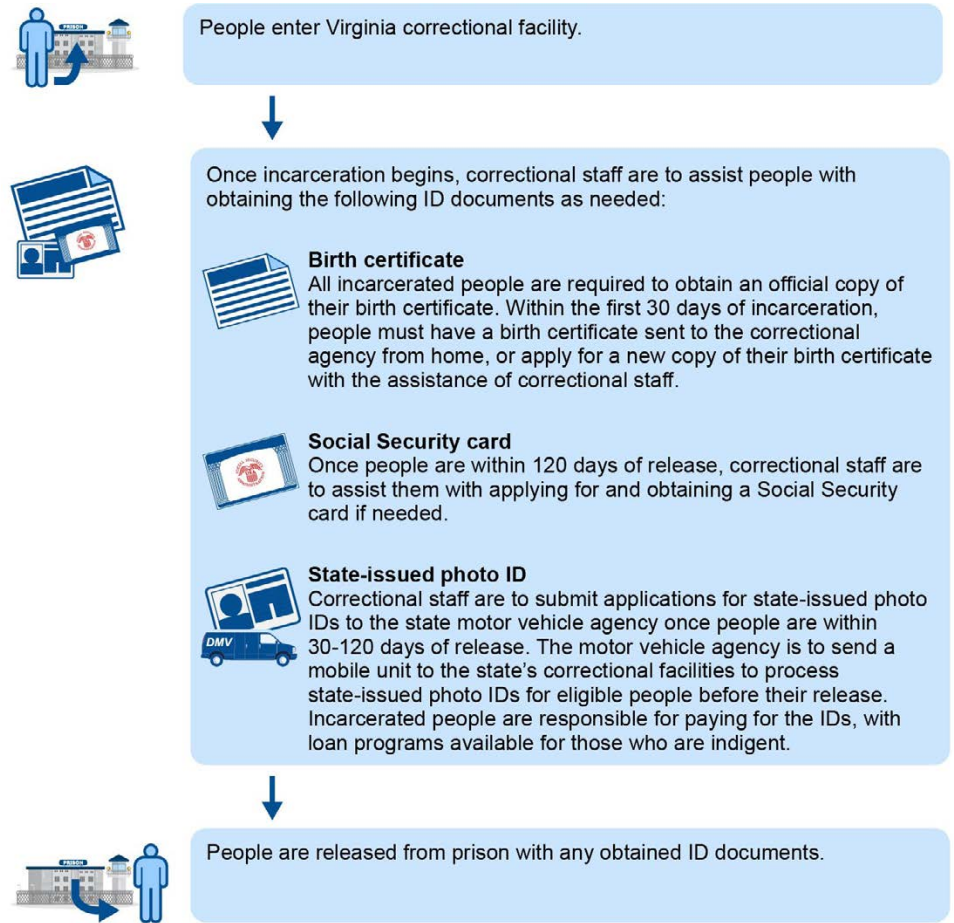
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<sup>10</sup>ODRC officials also informed us that people who take part in a work release program may be able to apply for and receive a driver's license while incarcerated. This would generally apply to those people who do warehouse or construction work that would require a driver's license. Some Ohio correctional facilities also have a commercial driver's license program.

<sup>11</sup>Va. Code Ann. § 53.1-31.4.

Appendix IV: Selected States' Approaches to Assisting Incarcerated People with Obtaining Identification (ID) Documents

Figure 17: Virginia Process for Issuing Identification (ID) Documents to Incarcerated People



Source: Virginia Department of Corrections; artinsipring/stock.adobe.com. | GAO-23-105302

**Birth Certificates and Social Security Cards.** People are given 30 days from intake to provide an official copy of their birth certificate before the DOC requires the person to fill out an application to obtain a new copy from Virginia or any other state. Incarcerated people who do not cooperate with the birth certificate application process can be sanctioned and lose good conduct time.

The DOC has an MOU with the local SSA office and is to assist incarcerated people with obtaining a Social Security card, if needed, when they are within 120 days of release. Once a birth certificate or Social Security card is received, DOC is to store it in the person's file until release.

**State Issued Photo IDs.** The DMV Connect unit has been operating at DOC facilities since 2012. According to DOC officials, within 45 days of release from prison, DOC staff are to upload incarcerated peoples' documentation into a central DMV system for eligibility review. The required documentation usually consists of a birth certificate, Social Security card, and a person's DOC identification and information form, known as a "face sheet." DMV personnel are to review the information and schedule eligible people for state-issued photo ID processing during a DMV Connect visit to a DOC facility.<sup>12</sup>

DOC officials we spoke to stated that people are mostly issued non-driver photo ID cards, but can get a replacement driver's license if they have a current, unexpired license. DMV Connect staff are also to provide people with a compliance summary that details any impediments a person will need to clear, such as fines, fees, or violations, in order to obtain a driver's license after release. People who refuse to apply for a state-issued photo ID are charged with a correctional offense and can lose good conduct time, which DOC officials stated has helped increase the number of people at DOC facilities who have left with a state-issued photo ID. According to DOC officials, they are piloting a program that allows people to take driver's license knowledge tests electronically. DMV officials stated that they have issued over 34,000 state-issued photo IDs to DOC offenders since the program began in 2012.

In addition, the DMV has an MOU with the BOP, which states that the DMV will regularly visit the two BOP facilities located in Virginia to issue IDs to eligible people using a similar process as described above. DMV officials informed us that as of December 2021, they had issued 511 state-issued photo IDs to federally incarcerated people at Petersburg Federal Correctional Complex since 2013, and 143 state-issued IDs to federally incarcerated people at U.S. Penitentiary Lee since 2014.

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<sup>12</sup>In addition, the DMV and Federal Correctional Complex Petersburg have a commercial driver's licensing program for training eligible people.

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# Appendix V: Comments from the U.S. Department of Justice

**Appendix V: Comments from the U.S.  
Department of Justice**



**U.S. Department of Justice**

Federal Bureau of Prisons

*Office of the Director*

*Washington, DC 20534*

November 17, 2022

Gretta L. Goodwin  
Director  
Homeland Security and Justice  
Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Ms. Goodwin,

The Bureau of Prisons (BOP) appreciates the opportunity to review and comment on the Government Accountability Office's (GAO) draft report entitled "Opportunities Exist to Better Assist Incarcerated People with Obtaining ID Documents Prior to Release" (GAO-23-105302). BOP offers the following comments regarding the recommendations.

**Recommendation 1: In developing its new federal ID card, the Director of BOP should identify key stakeholders and leverage their expertise to help ensure that BOP maximizes the potential uses of the ID card.**

**BOP Response:** BOP concurs with this recommendation and will continue its ongoing efforts to identify key stakeholders and leverage their expertise to ensure maximization of the potential uses of the ID card.

BOP notes, however, that tantamount to engaging stakeholder expertise is ensuring that BOP's ID initiative complies with federal law. Specifically, to maximize the usefulness of BOP's inmate ID, a BOP inmate identification card must meet the requirements of Form I-9, Employment Eligibility Verification, which is the federal standard for identification. For that reason, BOP's initial focus was necessarily on ascertaining that any proposed inmate ID would meet the I-9 requirements.

To ensure compliance with federal laws, BOP identified and engaged key subject matter experts at the Government Publishing Office (GPO), Transportation Security Agency (TSA), Immigration and Custom Enforcement (ICE), and Department of Homeland Security (DHS) in developing the Release Identification Card. BOP and the GPO then finalized development of the Release Identification Card, which is intended to meet inmate needs while complying with all relevant federal requirements, including TSA, ICE, and DHS security feature requirements necessary for the credentialing platforms used by those agencies. The Release Identification card has been approved by GPO and BOP, and the prototype printing phase is expected to occur during the second quarter FY 2023.

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**Appendix V: Comments from the U.S.  
Department of Justice**

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Nonetheless, as illustrated by BOP's ongoing efforts, BOP agrees that engaging non-federal stakeholders may be helpful. For instance, BOP continues ongoing contact with State Governors' Offices and State Commissioners for Departments of Motor Vehicles regarding exchanging the Release Identification Card for standard state-issued identification.

**Recommendation 2: The Director of the BOP should require BOP facility staff to record complete and consistent data on whether or not incarcerated people possess each type of ID document.**

**BOP Response:** While we concur with this recommendation, we recommend that GAO consider adjusting the language of this recommendation to accommodate circumstances where data is not available due to the absence of the inmate, such as when completion of processes to obtain ID documentation occurs after an inmate is released. We request that this recommendation be revised as follows:

*"The Director of the BOP should ensure that BOP policy requires BOP facility staff to record data as to whether or not incarcerated people possess each type of ID document."*

As indicated in the draft report, BOP intends revisions to its policy on inmate classification and program review policy which would require staff to record the relevant data. This policy is currently scheduled as part of upcoming negotiations with the Union, in which the inmate classification and program review policy will be combined with the policy for the unit management manual.

Currently, as inmates obtain each type of ID document during incarceration, case managers update BOP's case management system to reflect possession of the specific ID document and store the physical document in the inmate's central file until release. In addition, BOP staff post information on how to obtain state-issued photo IDs on TRULINCS, an electronic information sharing system accessible to individuals at each BOP facility. BOP case management staff update the database accordingly to reflect the presence or lack of the ID in question. This data can be examined across caseloads, institutions, regions, or agency-wide to monitor and oversee the effectiveness of the ID collection efforts.

**Recommendation 3: The Director of the BOP should examine the existing data fields to ensure that the appropriate information is being captured to clearly inform BOP of the number of people who have ID documents at home and choose not to have them sent to BOP facilities, as well as the reasons for not having ID documents.**

**BOP Response:** While we concur with this recommendation, we recommend that GAO consider adjusting the wording of this recommendation as follows:

*"The Director of the BOP should ensure that appropriate information is being captured to inform the BOP of the number of people who have ID documents, whether at home or onsite."*

This recommendation seeks to address the capture of data regarding the number of inmates in possession of ID documents who do not have them at BOP facilities, and the reasons why they may not have ID documents. This assessment can be addressed by amending BOP's policy on

**Appendix V: Comments from the U.S.  
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inmate classification and program review, as described in BOP's response to recommendation 2, above. BOP has determined that requiring staff to record relevant data will ensure the capture of appropriate information.

**Recommendation 4: Once BOP collects complete and consistent data and examines its existing data fields, the Director of BOP should analyze data bureauwide to gain a better understanding of why people do not have certain ID documents and how the agency can take steps to better assist these people.**

**BOP Response:** While BOP concurs with this recommendation, we recommend that GAO consider adjusting its wording as follows:

*"The Director of the BOP should conduct an analysis to gain a better understanding of why people do not have certain ID documents and how the agency can take steps to better assist these people."*


Inmates in BOP custody may not have ID documents for a variety of unique reasons which would be difficult to accurately capture. BOP instead proposes that this information be obtained through a voluntary survey of inmates posted to the inmate TRULINCS system. Separately, however, BOP will consider adding an item such as "Inmate has ID at home" to the application used by case management staff; doing so will allow insight as to the number of inmates who have IDs but are not in possession of them while in BOP custody and may lead to an increased number of IDs secured.

**Recommendation 5: The Director of BOP should make changes to the Statement of Work for RRCs to ensure that in future or renegotiated contracts, the RRCs are required to collect and regularly report data to BOP on the number of people obtaining ID documents while residing at RRCs.**

**BOP Response:** BOP concurs with this recommendation and will determine whether changes to the Statement of Work for RRCs are required to ensure collection and regular reporting of data to BOP on the number of inmates obtaining ID documents while at RRCs. However, we note that BOP currently receives quarterly statistics from RRCs and will add an additional reporting requirement as described.

Thank you for the opportunity to comment on this report. We look forward to GAO closing the recommendations that the BOP has agreed to address.

Sincerely,

  
+ Colette S. Peters  
Director



# Accessible Text for Appendix V: Comments from the U.S. Department of Justice

November 17, 2022

Gretta L. Goodwin  
Director  
Homeland Security and Justice  
Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Ms. Goodwin,

The Bureau of Prisons (BOP) appreciates the opportunity to review and comment on the Government Accountability Office's (GAO) draft report entitled "Opportunities Exist to Better Assist Incarcerated People with Obtaining ID Documents Prior to Release" (GAO-23-105302). BOP offers the following comments regarding the recommendations.

Recommendation 1: In developing its new federal ID card, the Director of BOP should identify key stakeholders and leverage their expertise to help ensure that BOP maximizes the potential uses of the ID card.

BOP Response: BOP concurs with this recommendation and will continue its ongoing efforts to identify key stakeholders and leverage their expertise to ensure maximization of the potential uses of the ID card.

BOP notes, however, that tantamount to engaging stakeholder expertise is ensuring that BOP's ID initiative complies with federal law. Specifically, to maximize the usefulness of BOP's inmate ID, a BOP inmate identification card must meet the requirements of Form 1-9, Employment Eligibility Verification, which is the federal standard for identification. For that reason, BOP's initial focus was necessarily on ascertaining that any proposed inmate ID would meet the 1-9 requirements.

To ensure compliance with federal laws, BOP identified and engaged key subject matter experts at the Government Publishing Office (GPO), Transportation Security Agency (TSA), Immigration and Custom Enforcement (ICE), and Department of Homeland Security (DHS) in developing the Release Identification Card. BOP and

the GPO then finalized development of the Release Identification Card, which is intended to meet inmate needs while complying with all relevant federal requirements, including TSA, ICE, and DHS security feature requirements necessary for the credentialing platforms used by those agencies. The Release Identification card has been approved by GPO and BOP, and the prototype printing phase is expected to occur during the second quarter FY 2023.

Nonetheless, as illustrated by BOP's ongoing efforts, BOP agrees that engaging non-federal stakeholders may be helpful. For instance, BOP continues ongoing contact with State Governors' Offices and State Commissioners for Departments of Motor Vehicles regarding exchanging the Release Identification Card for standard state-issued identification.

Recommendation 2: The Director of the BOP should require BOP facility staff to record complete and consistent data on whether or not incarcerated people possess each type of ID document.

BOP Response: While we concur with this recommendation, we recommend that GAO consider adjusting the language of this recommendation to accommodate circumstances where data is not available due to the absence of the inmate, such as when completion of processes to obtain ID documentation occurs after an inmate is released. We request that this recommendation be revised as follows:

"The Director of the BOP should ensure that BOP policy requires BOP facility staff to record data as to whether or not incarcerated people possess each type of ID document. "

As indicated in the draft report, BOP intends revisions to its policy on inmate classification and program review policy which would require staff to record the relevant data. This policy is currently scheduled as part of upcoming negotiations with the Union, in which the inmate classification and program review policy will be combined with the policy for the unit management manual.

Currently, as inmates obtain each type of ID document during incarceration, case managers update BOP's case management system to reflect possession of the specific ID document and store the physical document in the inmate's central file until release. In addition, BOP staff post information on how to obtain state-issued photo IDs on TRULINCS, an electronic information sharing system accessible to individuals at each BOP facility. BOP case management staff update the database accordingly to reflect the presence or lack of the ID in question. This data can be examined across caseloads, institutions, regions, or agency-wide to monitor and oversee the effectiveness of the ID collection efforts.

Recommendation 3: The Director of the BOP should examine the existing data fields to ensure that the appropriate information is being captured to clearly inform BOP of the number of people who have ID documents at home and choose not to have them sent to BOP facilities, as well as the reasons for not having ID documents.

BOP Response: While we concur with this recommendation, we recommend that GAO consider adjusting the wording of this recommendation as follows:

"The Director of the BOP should ensure that appropriate information is being captured to inform the BOP of the number of people who have ID documents, whether at home or onsite."

This recommendation seeks to address the capture of data regarding the number of inmates in possession of ID documents who do not have them at BOP facilities, and the reasons why they may not have ID documents. This assessment can be addressed by amending BOP's policy on inmate classification and program review, as described in BOP's response to recommendation 2, above. BOP has determined that requiring staff to record relevant data will ensure the capture of appropriate information.

Recommendation 4: Once BOP collects complete and consistent data and examines its existing data fields, the Director of BOP should analyze data bureauwide to gain a better understanding of why people do not have certain ID documents and how the agency can take steps to better assist these people.

BOP Response: While BOP concurs with this recommendation, we recommend that GAO consider adjusting its wording as follows:

"The Director of the BOP should conduct an analysis to gain a better understanding of why people do not have certain ID documents and how the agency can take steps to better assist these people."

Inmates in BOP custody may not have ID documents for a variety of unique reasons which would be difficult to accurately capture. BOP instead proposes that this information be obtained through a voluntary survey of inmates posted to the inmate TRULINCS system. Separately, however, BOP will consider adding an item such as "Inmate has ID at home" to the application used by case management staff; doing so will allow insight as to the number of inmates who have IDs but are not in possession of them while in BOP custody and may lead to an increased number of IDs secured.

Recommendation 5: The Director of BOP should make changes to the Statement of Work for RRCs to ensure that in future or renegotiated contracts, the RRCs are

required to collect and regularly report data to BOP on the number of people obtaining ID documents while residing at RRCs.

BOP Response: BOP concurs with this recommendation and will determine whether changes to the Statement of Work for RRCs are required to ensure collection and regular reporting of data to BOP on the number of inmates obtaining ID documents while at RRCs. However, we note that BOP currently receives quarterly statistics from RRCs and will add an additional reporting requirement as described.

Thank you for the opportunity to comment on this report. We look forward to GAO closing the recommendations that the BOP has agreed to address.

Sincerely,

Colette S. Peters  
Director

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## Appendix VI: GAO Contact and Staff Acknowledgments

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### GAO Contact

Gretta L. Goodwin, (202) 512-8777 or [GoodwinG@gao.gov](mailto:GoodwinG@gao.gov).

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### Staff Acknowledgments

In addition to the contact listed above, the following individuals made significant contributions to this report:

Tracey Cross (Assistant Director), Adam Couvillion (Analyst-in-Charge), Hiwotte Amare, Willie Commons III, Dominick Dale, Megan Graves, Melissa Hargy, Eric Hauswirth, Arlin Hourihan, Suzanne Kaasa, Won Lee, Abinash Mohanty, Jan Montgomery, and Paras Sharma.

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U.S. Government Accountability Office, 441 G Street NW, Room 7149  
Washington, DC 20548

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## Strategic Planning and External Liaison

Stephen J. Sanford, Managing Director, [spel@gao.gov](mailto:spel@gao.gov), (202) 512-4707  
U.S. Government Accountability Office, 441 G Street NW, Room 7814,  
Washington, DC 20548



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