

ID For the Homeless

Training Manual

**Presented by the Homeless Initiatives
Program Policy Integration Branch,
Ministry of Human Services**

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Table of Contents

Background & Purpose 3

Part One: Overview of Government Issued ID.....4-7

Part Two: Being a Certified Agency.....7-9

Part Three: Address Authorization.....9-13

Part Four: Identity Verification.....14-18

Appendix A: Government ID Q & A.....19-21

Appendix B: Address Authorization Q & A.....20-21

Appendix C: Identity Verification Q & A22

Schedule A, B, C and D22-23

Background and Purpose

In March 2009, Alberta became the first province in Canada to develop and commit to a visionary 10-year provincial homeless strategy. "A Plan for Alberta: Ending Homelessness in 10 Years" outlines a comprehensive, coordinated and sustainable approach to ending homelessness as we know it.

The plan sets out 17 strategies that will help us meet our goal by 2019. Strategy 15 of the Plan calls to:

Simplify personal identification requirements for accessing programs and services.

Without official identification, a homeless person cannot access some community services and programs. This barrier can create a domino effect that makes it more difficult to obtain a permanent home and can be a barrier to independence.

In April 2009 the Government of Alberta formed a cross-government committee on personal identification for the homeless and sought to implement Strategy 15. Through this initiative, the committee identified that there were two major barriers to obtaining: having proof of an address and verifying their identity. To address this, the committee developed two new processes to help homeless Albertans obtain Alberta Identification cards:

- The **Address Authorization** process authorizes the use of a shelter or drop-in's address for a homeless person applying for an Alberta Identification Card.
- The **Identity Certification** process certifies the applicant's identity. It allows a homeless or recently housed person to work with a service provider to verify their identity and obtain acceptable supporting documents in order to apply for an Alberta Identification Card.

The Alberta Identification Card is not a new form of government ID but is the same card already available to all Albertans. The card is indistinguishable from all other Alberta Identification cards – the only difference is the process used to obtain the card. This is a voluntary service which can be used for the homeless who choose to obtain an Alberta Identification Card.

This booklet is designed to train homeless serving agencies how to use the new processes to help their clients access identification. It also includes important information on Alberta government-issued photo identification and on how to acquire other types of identification. This booklet has four sections:

1. Overview of government-issued photo identification;
2. Being a Certifying Agency;
3. Address Authorization process; and
4. Identity Certification process.

Part One – Overview of Government-issued photo identification:

There are two types of photo identification issued by the Alberta government – the first is an Operator’s License. Obtaining this form is earned through successful completion of written knowledge test and a road test as required for certain license classifications. The license can be lost if an individual is convicted of violations under the Criminal Code of Canada, the Motor Vehicle Accident Claims Act, or the Traffic Safety Act . The second type of photo identification is an Alberta Identification Card.

To obtain Alberta government-issued identification, an Albertan must be able to satisfy three elements:

1. Who They Are (Photo Documents),
2. What They Have (Support Documents), and
3. What They Know About Themselves (Knowledge Verification.)

As part of these three components, it is essential clients have: 1. Proof of identity, 2. Proof of Alberta residence and 3. Proof of legal entitlement to be in Canada.

| Proof of Identity | Proof of Legal Entitlement to be in Canada | Proof of Alberta Residence |
|--|---|---|
| <ul style="list-style-type: none"> • Previous ID (Operator’s License Identification Card issued by Alberta or another province) • Métis Nations of Alberta Card (new version) • Passport • Photo on the Motor Vehicle Image Database • Canadian Indian Status | <ul style="list-style-type: none"> • Canadian Birth Certificate • Métis Nations of Alberta Card (new version) • Valid Canadian Passport • Valid Immigration documents (e.g. work or study permits) • Permanent Resident Card • Refugee Travel Documentation • Canadian Indian Status Card • Student Authorization | <ul style="list-style-type: none"> • Utility, telephone, gas or Cable TV bill with client’s name • Government mail (ex. Tax returns, AISH cheque, EI cheque, etc) mailed to home address • Tenancy Agreement • Address Authorization form • Alberta Social Benefits documents (e.g. AISH receipt) • Current bank and/or credit card statements mailed to residential address • Income Tax Return |

Identity Certification Form through the Homeless ID Program provides information for all 3 components.

Community Identification

Community-issued identification is not accepted by Registry Agents as an accepted support document to get government-issued photo identification. Ie. school IDs, local places of worship or IDs for access to shelters.

Previously held Alberta Government-issued Photo Identification

Registry agents may view a client's image on the MOVES image repository as a tool in confirming a client's identity. Since 2003 all facial images captured for Alberta operator's licenses and Identification Cards undergo facial comparison technology. Also, if someone had government-issued ID in another province, Registry Agents in Alberta use that as part of their identity verification process. **Applicants cannot request their photo be searched in the MOVES image repository. Photos in the database can only be used as a step in identity verification by the Registry Agents when someone is applying for ID.**

Conditions for obtaining ID for under 18:

- Clients under the age of 18 who are not self-supporting or married **must** have their parent/guardian's consent when applying for an Operator's License or Identification Card.
- Clients may provide either a marriage certificate or Civil Marriage Statement as proof of marriage.
- A client may submit cancelled cheques, bank statements, rent receipt, pay stubs, utility bills in their name or written confirmation of employment as proof they are self-supporting.
- Minors must meet the proof of identity, Alberta residency and legal entitlement to be in Canada requirements prior to being issued an Alberta operator's license or Identification Card.

Where do you obtain Alberta Government issued identification?

Alberta registry agents are approved by Service Alberta to issue Alberta Operator's Licenses and Identification Cards from their offices. For a list of registry agents see [here](#). Registry Agents also process birth certificate applications and select Registry Agents process applications for health care cards. A list of registry agents offering health care registration services is available [here](#).

Cost of Identification

The fees for government-issued photo identification are listed online on the Service Alberta website [here](#).

As of June 2014 it costs \$51.45 to obtain an Alberta Identification Card for the first time for a 5 year term. A replacement card costs \$23.10.

Note, the ID can be issued for 1, 2, 3, or 5 years. If your client is not stably housed, it is recommended that they obtain for a 1 year term.

See all prices for the Alberta Identification Card below.

| ID Card (valid for years) | Government Fee | Maximum Service Charge | Total Price |
|---------------------------|----------------|------------------------|-------------|
| 1 | \$8 | \$6 | \$14+GST |
| 2 | \$16 | \$7 | \$23+GST |
| 3 | \$24 | \$8 | \$32+GST |
| 4 | \$32 | \$9 | \$41+GST |
| 5 | \$40 | \$9 | \$49+GST |

Types of Payment Accepted

- Cash or Debit.
- Credit Cards. Note, some Registry agents do not accept credit cards, so be prepared to pay with Cash or Debit.
- Human Services Programs such as: Alberta Works, Income Support and the Outreach Support Services program may provide assistance to clients in paying for an operator's licence or identification card if it helps the client gain employment and/or get back on their feet.

Change of Address

The address on an Alberta Identification Card and Operator's License needs to be updated within 14 days of a change of address. Otherwise, a \$115.00 ticket is applied to the client's account by Service Alberta.

Indefinite Suspensions, Outstanding Fines and Maintenance Enforcement Program Restrictions

Clients with suspensions, fines and/or restrictions may apply for an Alberta Identification Card; if the client has an Alberta Operator's license the registry agent will re-class the Operator's License to an Identification Card. The suspension, fines and restrictions will remain on the client file until dealt with.

Outstanding fines are recorded on MOVES (the Registry Agent's software program). To determine if your client has fines, your client will need to go in-person to see a Registry Agent and have their file accessed. This will not remove the fine.

The Registry Agent cannot charge a fee to have fines lifted. Fines can be lifted numerous times in order to issue an ID card.

Maintenance Enforcement Program Restriction

Effective February 22, 2010, clients with an Alberta Maintenance Enforcement (MEP) Restriction are eligible to apply for an Alberta Identification Card (ID card). The ID card will only be issued for a one to two year term.

When a client with an MEP restriction applies for an Alberta Identification Card, the Registry Agent must phone the Maintenance Enforcement Office before the ID can be issued. The applicant must remain at the Registry Agent's office for the duration of this call. The Maintenance Enforcement Office is closed during the lunch hour

(12 pm to 1 pm) so applicants with MEP restrictions should not apply for ID during this time.

To have the MEP suspension lifted, neither the individual nor Certifying Agency can complete the process over the phone. The registry agent would complete an action the request when the client is in their office by contacting Service Alberta's Motor Vehicles (MV) department and MV would request the lifting of the MEP suspension. There are no limits to how many times MEP suspensions can be lifted. ID cards can be issued numerous times.

Once the ID card has been issued, the suspension is then updated to the client's file.

Criminal record or warrant

A criminal record does not prevent the issuance of Alberta identification. Only law enforcement Agencies have the access to check to see if a person has an outstanding warrant or a criminal record; Registry Agents, who are in charge of issuing identification, do not have this access.

Part Two- Being a Certifying Agency

Overview

Agencies are being certified for use of the Address Authorization and Identity Certification processes. Only Certified Agencies can use those processes to help their clients obtain identification.

The **Address Authorization** process authorizes the use of a shelter or drop-in's address for a homeless person applying for an Alberta Identification Card.

The **Identity Certification** process certifies the applicant's identity. It allows a homeless or recently housed person to work with a service provider to verify their identity and obtain acceptable supporting documents in order to apply for an Alberta Identification Card.

Definitions

1. "**Certifier**" means an employee of the Agency who has been approved by the Agency's Chief Executive Officer to certify an applicant's information on either the Address Authorization Form or the Identity Certification Form.
2. "**Certifying Agency**" means an agency designated by the Minister as an approved agency for use of the Address Authorization Form and the Identity Certification Form.

Becoming and recognizing your responsibilities as a Certifying Agency:

To become a Certifying Agency, agencies must:

1. Be approved by HS;
2. Complete training (offered by HS); and,
3. Sign the 'Certifying Agency Agreement.' This is a legal contract between HS and the agency.

The agency must ensure their staff is adequately trained in the Alberta Identification processes.

The implications of being a Certifying Agency:

Agencies must abide by the conditions set out in the 'Certifying Agency Agreement.' Sections 5 through

5. When working with an applicant to certify an Identity Certification Form, the Agency must:
 - a) follow the process and requirements outlined in the Identify Verification Document; and
 - b) ensure the applicant meets all eligibility criteria outlined in the Identity Verification Document.

6. The Agency must ensure that all Certifiers are current employees of the Agency.

7. The Agency must promptly notify the Minister if the core business of the Agency changes.

8. The Agency must immediately notify the Minister if the Agency becomes aware of, or has reasonable grounds to believe that, any information provided in a completed form is incorrect.

This can be done by notifying Homeless Program Policy Integration at 403-297-3368.

9. If certifying an Address Authorization Form, the Certified Agency must keep a copy of the completed Address Authorization Form as a record according to the conditions outlined in Schedule A.

10. If certifying an Identity Certification Form, the Certified Agency must keep a copy of all Completed forms from the Identity Verification Document, the completed Identity Certification Form and any other accompanying documentation used to complete the identity verification of an applicant as records according to the conditions outlined in Schedule A.

11. The Agency must permit the Minister, or the Minister's representative authorized in writing, to examine, during regular business hours, the books or records relating to its activities as a Certifying Agency.

Reporting Requirements in the Certifying Agency Agreement

HS will be utilizing this reporting requirement to conduct an annual audit to ensure the agency's identity verification work is adequately vigorous for the Identity Certification forms they have signed off on.

In addition, a Certifying Agency may be called upon to prove that proper due diligence was undertaken in the event of an investigation through Alberta Registries or law enforcement (for identity fraud). The Certifier may be subpoenaed to attend court.

It is the Agency's responsibility to ensure the identity verification work is sufficiently vigorous prior to certifying the Identity Certification form.

If the Certifier is not confident that the applicant's identity has been verified, then the Certifier should refuse to certify their application.

If any of the outlined conditions or requirements are not met, HS may revoke an agency's right to be a Certifying Agency.

FOIP Implications for Agencies

- As completing the processes includes working with an applicant's personal information, some criteria have been established that agencies must abide by as per the Freedom of Information and Privacy Act (FOIP Act).
- These are outlined further in the 'Certifying Agency Agreements.'
- The Address Authorization and Identity Certification processes were reviewed by the Office of the Information and Privacy Commissioner.

Legal Implications for Agencies

- It is a criminal offense for the applicant to falsify information for an Alberta Identification Card.
- It is a criminal offense for a service provider to knowingly assist a client with fraudulently obtaining an Alberta Identification Card.
- The Certifying Agency may be called upon to prove that proper due diligence was undertaken in the event of an investigation through Alberta Registries or law enforcement. The service provider who acted as Certifier may be subpoenaed to attend court.

Q&A on Being a Certified Agency is in Appendix A.

Part Three - Address Authorization

The **Address Authorization** process authorizes the use of a shelter or drop-in's address for a homeless person applying for an Alberta Identification Card.

This process was designed to overcome the reality that many homeless people sleep in shelters or on the streets. Until now, such citizens could not show proof of an Alberta street address as previously accepted by Service Alberta to apply for government-issued identification.

Who can use it? Eligible Applicants who can use the Address Authorization Form are:

- 1) Residents of Alberta: A resident of Alberta is a person who: is lawfully entitled to be or to remain in Canada; and makes his or her home in, and is ordinarily present in Alberta.
- 2) 18 years or older
- 3) Currently homeless, and
- 4) Who have resided in Alberta for at least 90 days. Note, is not required that the applicant has resided at the same shelter or address for 90 consecutive days – only that they have remained primarily in Alberta. Applicants can leave the province temporarily (e.g. take a two week holiday in BC) and still be considered a resident of Alberta if the applicant is ordinarily present in Alberta

Tips

- The applicant must not have documented proof of an Alberta street address and must have permission to receive mail and legal notices at the agency certifying the form.
- The Address Authorization Form is for people who live in shelters, transitional housing facilities, and rough sleepers (people who sleep outdoors). The Form is not intended for the transient homeless or for couch-surfers staying with family or friends.
- The Address Authorization Form serves as proof of Alberta residence only for an applicant applying for an Alberta Identification Card.

How it works:

1. The applicant, the Certifier and the agency's CEO or designate complete and sign the Address Authorization Form.
2. The applicant brings the completed Address Authorization Form to a Registry Agent when applying for an Alberta Identification Card. It will serve as the proof of Alberta residence.
 - **To get ID, the applicant still requires proof of identity and proof of legal entitlement to be in Canada and to pay for the card.**

The Certifier is not required to accompany the applicant to the Registry Agent.

3. The Registry Agent may go to the [ID for the Homeless Program's website](#) to verify that the agency is a Certifying Agency.
4. The ID will be mailed to the address of the agency that certifies the Address Authorization form and the agency's address will be listed on the ID card.

Legal implication for the applicant and the agency:

- For the applicant: It is a criminal offense to falsify information when applying for an Alberta Identification Card.
- For the Certifier and the agency's CEO or designate: It is a criminal offense to knowingly assist an individual with fraudulently obtaining an Alberta Identification Card.

Agency Record-keeping:

- For agency must keep the Address Authorization Form and any accompanying documentation for their records.
- Records must be kept for 7 years.

FOIP Implications:

- There is a FOIP clause on the Address Authorization Form the applicant must read prior to signing the form.

ADDRESS AUTHORIZATION FORM

This form must be completed when the applicant for an Alberta Identification Card is currently homeless and cannot provide a physical Alberta address as required by legislation. In lieu, an applicant may provide the address of a Certified Agency.

CERTIFICATION BY THE APPLICANT

| | | | |
|------------------------|------------------------|-----------|---------------|
| APPLICANT'S FIRST NAME | MIDDLE NAME OR INITIAL | LAST NAME | DATE OF BIRTH |
| ALBERTA STREET ADDRESS | | CITY | PROVINCE |
| | | | POSTAL CODE |

I certify that I am the person described above, that I am a resident of the province of Alberta, that I do not have documented proof of an Alberta street address, that I am authorized to use the Certified Agency's address to receive mail and legal notices, and I request that the address above be entered as my address on any Alberta Identification Card issued to me.

By signing this form, I hereby authorize the Minister of Housing and Urban Affairs to collect this information under Section 34(1)(a)(i) of the *FOIP Act* for the purpose of carrying out a program, activity or policy under his administration.

WARNING: This document is part of an application for an Alberta Identification Card. It is a criminal offense to falsify information when applying for an Alberta Identification Card.

APPLICANT'S SIGNATURE: X _____ DATE: _____

CERTIFICATION BY THE CERTIFIED AGENCY

| | | | |
|---------------------------------|---------------------------|---------------------------------|-------------|
| NAME OF CERTIFIED AGENCY | | | |
| ADDRESS OF THE CERTIFIED AGENCY | CITY | PROVINCE | POSTAL CODE |
| NAME OF THE CERTIFIER | TELEPHONE NUMBER () - | FAX OR EMAIL ADDRESS (Optional) | |

I certify that I am a Certifier of the above Certified Agency, that to the best of my knowledge and belief the applicant is a resident of the province of Alberta and does not have documentary proof of an Alberta street address, and that the applicant can receive mail and legal notice at the Certified Agency's address listed above.

WARNING: It is a criminal offense to knowingly assist an individual with fraudulently obtaining an Alberta Identification Card.

CERTIFIER'S SIGNATURE: X _____ DATE: _____

| | | |
|---|---------------------------|---------------|
| NAME OF THE CERTIFIED AGENCY'S CEO or DESIGNATE | TELEPHONE NUMBER () - | EMAIL ADDRESS |
|---|---------------------------|---------------|

I certify that I am the CEO or designate of the above Certified Agency and that to the best of my knowledge the Certifier has done adequate due diligence in verifying that the applicant is a resident of the province of Alberta, and does not have documentary proof of an Alberta street address.

WARNING: It is a criminal offense to knowingly assist an individual with fraudulently obtaining an Alberta Identification Card.

CERTIFYING AGENCY'S CEO OR DESIGNATE'S SIGNATURE: X _____ DATE: _____

The personal information on this form is being collected under the authority of Sections 33 (c) of the *Freedom of Information and Protection of Privacy (FOIP) Act* and in accordance with any applicable agreements in place between this agency and the Minister of Human Services, for the purpose of providing the applicant with personal identification services. It will be treated in accordance with the privacy provisions of Part 2 of the *FOIP Act* and in accordance with any applicable agreements in place between this agency and the Minister of Human Services. If you have any questions, contact Homeless Supports Initiative Program Policy Integration, Ministry of Human Services 403-297-3368.

The I.D. for the Homeless Program Checklist - Address Authorization

Explain the purpose of the program to the client and review, Schedule A : Consent Information

_____ Step 1. Determine Eligibility (All 4 conditions must apply).

1. Residents of Alberta: A resident of Alberta is a person who: is lawfully entitled to be or to remain in Canada; and makes his or her home in, and is ordinarily present in Alberta.
2. 18 years or older
3. Currently homeless, and
4. Who have resided in Alberta for at least 90 days. Note, is not required that the applicant has resided at the same shelter or address for 90 consecutive days – only that they have remained primarily in Alberta. Applicants can leave the province temporarily (e.g. take a two week holiday in BC) and still be considered a resident of Alberta if the applicant is ordinarily present in Alberta

_____ Step 2: Have client sign FOIP consent and consent to Participate.

_____ Step 3: Confirm Legal Entitlement to living in Canada.

_____ Complete Personal Identification check

_____ AB Residency for 90 Days (utilize phone bill, or utility bill, rental agreement etc.)

_____ Record all fact-checking documentation, in Schedule C: Address Authorization Form.

_____ Once all components are verified, the applicant and certifier should complete the Identity Verification Form.

_____ Have CEO or their designate sign off and complete verification process.

_____ Make copies of all documents, and store them according to FOIP guidelines.

_____ Client goes to Registry to complete Address Authorization, along with their ID & Address Authorization form to complete the process.

Examples

Violet

Violet is a woman fleeing violence with ID but she wants to change her address. She has lived in Alberta her whole life.

- Violet has other ID to demonstrate proof of identity and legal entitlement to be in Canada. With the Address Authorization Form, she can update her ID card to the new address (or P.O. Box) of the shelter or transitional housing facility where she is now staying.

Eddy

Two months ago Eddy starting spending most nights at Hope Mission. He comes to Boyle a lot in the day. He has an ON Driver's License from 2006 but also owes money to MEP. Boyle got him an AB Health Care Card through the project. He needs ID to apply for social housing.

- So Eddy already has proof of identity and legal entitlement to be in Canada through this Driver's License and one other supporting document (the Health Care Card). All he needs is the Address Authorization Form to demonstrate proof of Alberta residence. Hope Mission should be the agency to certify his Address Authorization Form.
- Once Eddy moves into social housing he should update his ID card with his new address. Note, if Eddy's Driver's License was older and now expired (say from 1996) then the Identity Certification Process should be used to help Eddy get ID. (Registry Agents will only accept recently expired ID documents.) Eddy's identity could be verified through the expired Driver's License and Health Care Card, then Eddy, his Certifier and the agency's CEO or designate could complete the Identity Certification Form.

Q & A on the Address Authorization Form in Appendix B.

Part Four - Identity Certification

The **Identity Certification** process certifies the applicant's identity. It allows a homeless or recently housed person to work with a Certifier **to verify their identity** and obtain acceptable supporting documents in order to apply for an Alberta Identification Card. To assist with verifying identity, alternate channels may be utilized. Alternate channels are options for fact-checking someone's identity through a trusted record or authority figure.

So what is new with the Identity Certification process?

- 1) Expired or photo-copied documents can be accepted as part of identity verification.
- 2) A broadening of what documents can be used to verify identity (e.g. hospital records, records of incarceration) and the use of verified personal numbers (e.g. Indian Status Number, Alberta Health Care Number.)
- 3) To assist with verifying identity, alternative channels may be utilized.
 - Alternative channels are options for fact-checking someone's identity through a trusted record or authority figure. The Identity Verification Document has instructions for using Alternative Channels.

So what is identity verification?

It is a process that requires Certifiers to confirm a client's legal name, their date of birth and legal entitlement to be in Canada.

Who can use the Identity Certification Form?

Eligibility for the Identity Certification Form is limited to applicants who are:

- 1)** The applicant must not have documented proof of their identity and must have permission to receive mail and legal notices at the agency certifying the form.
- 2) Residents of Alberta:** someone who is lawfully entitled to be or to remain in Canada; and makes his or her home in, and is ordinarily present in Alberta.
- 3) 18 years or older,**
- 4) Currently or recently homeless.** For the purposes of the Identity Certification Form a person is considered recently homeless if he or she was homeless at some time within the past six months.
- 5) Who have resided in Alberta for at least 90 days.** Note, it is not required that the applicant has resided at the same shelter or address for 90 consecutive days – only that they have remained primarily in Alberta. Applicants can leave the province temporarily (e.g. take a two week holiday in BC) and still be considered a resident of Alberta if the applicant is ordinarily present in Alberta.

How it works:

1. The applicant and the Certifier work together to complete the verification of the applicant's identity.

➤ An Identity Verification Document, which includes detailed instructions for using alternative channels and on how to verify the applicant's identity, has been developed by HS to assist service providers in completing identity verification of their client.

2. The applicant and Certifier, complete a Consent to Disclosure form will allows the Certified Agency Staff to collect personal information from the client under FOIP.

3. After the applicant's identity has been verified, the applicant, the Certifier and the agency's CEO or designate complete and signs the Identity Certification Form.

➤ If the **Certifier is not confident** that the applicant's identity has been verified, then the Certifier **should not certify their application**.

4. The applicant brings the completed Identity Certification Form to a Registry Agent when applying for an Alberta Identification Card. It will serve as the proof of Alberta residence, proof of legal entitlement to be in Canada and proof of identity.

➤ To get ID, the applicant is still required to pay for the card.

The Certifier **must accompany the applicant to the Registry Agent** and must bring proof of employment and a piece of their own government-issued photo identification. The Registry Agent will check for the Certifier's proof of employment and will record their identification on the applicant's application for an Alberta Identification Card.

5. The Registry Agent may go to the [Human Services website](#) to verify that the agency is a Certifying Agency.

6. The ID may be mailed to the address of the agency that certifies the Identity Certification form because the agency's address will be recorded on the form not the client's.

Legal implication for the applicant and the agency:

- For the applicant: It is a criminal offense to falsify information when applying for an Alberta Identification Card.

- For the Certifier and the agency's CEO or designate: It is a criminal offense to knowingly assist an individual with fraudulently obtaining an Alberta Identification Card.

Agency Record-keeping:

- The agency must keep the Identity Certification Form, Steps 1, 2, and 5 of the Identity Verification Document and any accompanying documentation on file.

- All records must be kept for 7 years.

FOIP:

Getting Permission to start Step 2 of the Identity Verification Document has a FOIP clause your client must sign to give you permission to begin working with their personal information using the Consent to Disclosure Form.

Verifying Identity

For 'Trusted Records or Sources' without a program specific FOIP instructions and consent form, the Certifier must use the Consent to Disclosure of Personal Information Form to get their client's permission to contact that source.

This Form allows the Certifier to list ALL the 'Trusted Records or Sources' the Certifier may pursue while doing identity verification work and for the applicant to authorize the Certifier to work with the listed organizations or individuals on the form.

The applicant's authorization will expire one year after the client leaves the program.

Q & A on the Identity Certification Process found in Appendix C.

The I.D. for the Homeless Program Checklist - ID Verification

After you explain the purpose of the program to the client complete the following & have reviewed Schedule A: Collection of Personal Information:

___ Step 1. Determine Eligibility (All 4 conditions must apply).

1. Residents of Alberta: A resident of Alberta is a person who: is lawfully entitled to be or to remain in Canada; a makes his or her home in, and is ordinarily present in Alberta.
2. 18 years or older
3. Currently homeless, and
4. Who have resided in Alberta for at least 90 days. Note, is not required that the applicant has resided the same shelter or address for 90 consecutive days – only that they have remained primarily in Alberta. Applicants can leave the province temporarily (e.g. take a two week holiday in BC) and still be considered a resident of Alberta if the applicant is ordinarily present in Alberta

___ Step 2: Have client sign FOIP consent and consent to Participate (p. 6 of Schedule C: ID Certification Doc).

___ Step 3: Obtain the 'Personal Information for Verification'

- Confirm Legal Entitlement to living in Canada.
- Complete Personal Identification check
- AB Residency for 90 Days (utilize phone bill, or utility bill, rental agreement etc.)

___ Step 4: Determine whether you feel confident that the applicant's identity has been verified (P. 12 of Schedule C: ID Verification Doc)

___ Step 5: Record all fact-checking documentation, in Schedule D: ID Verification Summary Form.

___ Step 6: Have CEO or their designate sign off and complete verification process.

___ Make copies of all documents, and store them according to FOIP guidelines outlined in Schedule A.

___ Client and Certifier go to registry with the ID Verification Form. Certifier must bring letter of employment/Agency's ID Card and their AB ID or AB Driver's License.

Appendix A

1) Please provide further information on what constitutes 'reasonable grounds to believe that any information provided in a completed form is incorrect?'

This is referring to after an agency certifies an Identity Certification or Address Authorization Form. At this point, reasonable grounds to believe any information provided in a completed form is incorrect could occur two ways: 1) the agency sees potential evidence and 2) there is a 3rd party allegation to this effect.

Before completing an Identity Certification Form, the Certifier must feel:

- Confident that the person's true identity is known, and;
- Confident that the Certifier would be able to defend the process used to confirm their identity in a court of law.

If information comes after the Certifier has completed due diligence and the application passed the test above, then 'reasonable grounds' is anything that gives the Certifier probable cause to now believe that any information provided in the completed form is incorrect (i.e. that the verified identity is falsified.) and HS must be notified.

2) If a client just lost their ID and need a new one, can they just go to the Registry Agent or do they need to have the form again?

If the agency is still working with / has contact with the client, the easiest and best thing to do in this case is to re-sign the form and go back to the Registry Agent with the completed form.

3) What if a Certifier leaves the agency and then there is a fraud investigation? Is the agency now liable?

Whether they are liable would depend on the circumstances. The question would come down to whether they were negligent in certifying the identity. If they are negligent they could be liable. If they follow the guidelines and the Agency takes care to ensure the certifier has done their due diligence they should meet their standard of care (i.e. not be liable.)

The agency could attract liability where they failed to take the care to verify the identity as required by the forms and resulting harm ensues. If agencies have concerns about liability they should consult with their legal counsel for advice on mitigating the risk.

4) What happens when an Identity Certification or Address Authorization Form is lost?

If any of the documentation pertaining to the client's personal information is lost or used inappropriately by the Agency, this would be considered a breach of FOIP. This would require the Agency to report the breach to HS and to notify the client that their information has been lost, and what actions are being taken to remedy the situation.

However, if it is the client who loses the form, this is not a breach of FOIP. The client should be told that if they lose their own information they need to alert the Agency/case worker to this so they can note in the file not to accept the form from anyone else as it may be a false representation.

5) What should an agency do when an applicant doesn't pick up their ID card?

HS recommends the agency hold onto the card for 120 days, as a reasonable amount of time Identification Cards that are not picked up by the client within a reasonable time must be 'Returned to Sender.' For Alberta ID cards, 'Return to Sender' means it goes to the Alberta Registries Office, who then are authorized to destroy the card. The card must be destroyed to prevent the subject's

personal information from being obtained from the card and used in identity fraud by the finder. Any records, or copies that you have of their personal information other than the ID Card must be kept for 7 years.

Appendix B

Change of Address

All Albertans are required to update their ID within 14 days of a change of address. Not doing so could result in a \$115 fine. Updating an address means getting a new ID card. There is a fee for the change of address service and for printing the new card.

1) For a homeless person, what constitutes a change of address?

A change of address is required if:

- A homeless person moves into permanent housing
- A homeless person permanently changes residences

No change of address required if:

- A person continues to reside primary at the shelter that authorized their form but is temporarily living elsewhere
- A person becomes a 'rough sleeper'

2) Can people staying with friends or family use the Address Authorization Form too?

If someone is staying with friends or family but is not on the tenancy agreement, he / she can use these other options to demonstrate proof of Alberta residence: government mail, including Alberta Social benefit documents (e.g. AISH and income support receipt) mailed to the address, utility / telephone / gas / cable bill in the client's name, income tax return and current bank or credit card statements mailed to that address.

If the person still lacks documented proof of an Alberta residence, they can submit a letter from their family or friend that indicates the applicant is residing with them and their personal identification such as their driver's license number and number that they can be contacted at.

3) If a client is staying at a shelter but also getting help from another agency, can they use the agency's address as the address? Do you have to confirm with the shelter?

No. The accommodation is provided by the shelter (i.e. it is their address) so it should be the shelter who issued the Address Authorization Form and the shelter's address or PO Box that is listed on the card.

4) Which agency should be the one to certify the Address Authorization Form?

The shelter that is the person's primary address (where he / she reside most often) should be the one to certify the Address Authorization Form.

5) If agencies have a PO Box and a physical address, can applicants use the PO Box as the address listed on their ID card?

Yes, so long as the client can receive their mail from the agency's PO Box.

Appendix C

Is there a minimum due diligence in verifying identity?

Due to the enormous variation in clients and in the means of doing identity verification, HS is not specifying exactly what constitutes 'identity verification.' Before certifying someone's identity, you should feel:

- Confident you know the person's true identity; and
- Confident you would be able to defend the process you used to confirm their identity, if necessary in a court of law.

The CEO or designate signing off on the application should also feel confident that the Certifier has done sufficient due diligence to verify the applicant's identity and legal entitlement to be in Canada.

2) Please provide an example where enough secondary documentation constituted identity verification without obtaining a primary (photo) document?

Example #1:

1. Photocopy of birth certificate, stamped by the BC government, saying it was taken from the original
2. Photocopy of SIN card, stamped by the BC government, saying it was taken from the original
3. Letter from Alberta Health and Wellness that confirms the client's health care number, name and address
4. Community Identification
5. Insurance papers with the client's name and birth date

Example #2:

1. Birth Certificate obtained by the Certifier (proof of legal entitlement to be in Canada);
2. Social Insurance Number;
3. Pay Stubbs; and
4. Court Documents and Custody Papers.

3) What happens in case that an agency is helping an applicant complete the Identity Certification process, but the applicant actually primarily resides at a different shelter?

The agency helping the applicant complete the Identity Certification process should get proof from the shelter that the applicant primarily resides there. The best practice is for the agency to use an Address Authorization Form completed by the shelter and the applicant as proof of the applicant's residence in Alberta. Then the agency should list the shelter's address on the Identity Certification Form.

The Alberta Identification card issued will list the shelter's address as the applicant's address.

4) What documents constitute legal entitlement to be in Canada?

All the documents that constitute legal entitlement to be in Canada are listed in the Identity Verification Document in Step 3.

For Canadian born citizens support documents that show legal entitlement to be in Canada include birth certificates, Operator's License or Identification cards, an Indian Status Card, a Metis Nation Card, or a Canadian passport.

For immigrants to Canada, support documents that show legal entitlement to be in Canada include Permanent Resident/Landed Immigrant Card, card and a Canadian citizenship card or Birth Certificate.

For the purposes of the Identity Certification process, photocopies and expired versions of the above documents can be used.

Since the ways of the Certifier completing identity verification, including verifying legal entitlement to be in Canada, are non-exhaustive, the Certifier may come across other ways of proving legal entitlement to be in Canada.

5) If I am contacting an Alternate Channel not included in the Identity Verification Document and which is not aware of the Identity Certification policy, how can I demonstrate that I am following a legitimate process to help my client get ID?

You can direct the organization to HS's webpage [here](#), which has information on the Identity Certification and Address Authorization processes.

6) If one agency has started the identity verification work and the client goes to another agency, is there a way the work can be transferred to the new agency?

Yes. To do so, the new agency (Agency #2) working with the client must fill out and have the client sign the Consent to Client File Transfer Form and send it to the agency (Agency #1) that was previously working with the client on identity verification. Upon receipt of this form, Agency #1 can release the client's file to Agency #2. **However, the person signing off on the final Identity Certification Form must take full responsibility for certifying the client's identity.**

Schedule A: Collection of Personal Information

- a.) All Personal Information relating to the Address Authorization Form and the Identity Certification Form belongs to the Minister and must be given to the Minister immediately upon request or when this Agreement ends, or is terminated whichever occurs first.
- b.) The Agency must ensure the direct consent of the Client is obtained in accordance with the appropriate forms attached in Schedules “B”, “C “ and “D” in order for the Minister to collect, use and to share the Personal Information.
- c.) The Agency is responsible for ensuring that its employees, agents and subcontractors are aware of and understand the requirements of the *Freedom of Information and Protection of Privacy Act* as it relates to this Agreement before the employees, agents or subcontractors perform duties that involve the collection, sharing and use of Personal Information pursuant to this Agreement.
- d.) The Agency must ensure the Personal Information that is collected and stored pursuant to this Agreement is protected by making security arrangements against such risks as unauthorized access, collection, use, disclosure, disposal, and disaster to the satisfaction of the Minister.
- e.) The Agency is responsible for the collection, storage and disclosure of Personal Information for the purposes of this Agreement.
- f.) Any records or information transferred to, collected or created by the Agency in carrying out its responsibilities under this Agreement must be kept separate from other business or operational records or information of the Agency.
- g.) The Agency must ensure that any Personal Information collected pursuant to this Agreement is not stored outside of Alberta and is not accessible by other countries.
- h.) Upon receipt of a request for records from the Minister, the Agency will provide the Minister with all relevant records within the timeframes specified by the Minister.
- i.) The Agency acknowledges that the *Freedom of Information and Protection of Privacy Act* applies to all information and records transferred to or collected, created, maintained, or stored by the Agency or its subcontractor under this Agreement.
- j.) The Agency shall ensure that all records are retained for seven years, after which such records may be disposed of only upon the Minister’s written consent.

k.) The Agency will cooperate with the Minister with respect to FOIP requests and any investigation or inquiry before the Office of the Information and Privacy Commissioner regarding the processing of a FOIP request or non-compliance with the FOIP legislation.

l.) The Minister or a person authorized by the Minister may on reasonable notice to the Agency, inspect and evaluate the Agency's compliance with the privacy, security and information management requirements under this Agreement.

m.) If the Agency discovers or suspects that Personal Information has been disclosed in breach of the terms of this Agreement, it shall immediately notify the Minister of the details of such disclosure in writing.

n.) The obligations of the Minister and the Agency pursuant to this Schedule shall survive the expiry or termination of this Agreement.

[Schedule B: Address Authorization Form](#)

[Schedule C: Identity Verification Document](#)

[Schedule D: Identity Certification Form](#)