



STATE OF RHODE ISLAND

**DIVISION OF MOTOR VEHICLES
ADMINISTRATION OFFICE**

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April 1, 2025

The Honorable Robert E. Craven, Sr.
Chair, House Committee on Judiciary
State House
Providence, RI 02903

**RE: 2025 H-6064 - AN ACT RELATING TO MOTOR AND OTHER VEHICLES
– STATE IDENTIFICATION CARDS FOR MINORS WITHOUT
RESIDENCE ACT**

Dear Chair Craven:

The Division of Motor Vehicles (“DMV”) writes to express concerns regarding House Bill 6064, An Act Relating to Motor and Other Vehicles – State Identification Cards for Minors Without Residence Act, and respectfully requests an amendment to require proof of the minor’s identity prior to issuance of an identification card.

The proposed bill would allow a minor between the ages of fourteen (14) and seventeen (17) who does not have a permanent residence or is in the custody of the Department of Children, Youth and Families (DCYF), to receive a state identification card without a signature from a parent, guardian or foster parent at no cost.

The newly created Section 31-10.5-2(a) provides for the issuance of the identification cards for minors by the DMV “pursuant to § 3-8-6.1.” The existing R.I. Gen. Laws § 3-8-6.1(a)(1) and 280-RICR-30-00-1.4.1 contain a comprehensive list of documents which constitute acceptable forms of proof of identity when applying for an identification card. Included in that list are certified birth certificates, U.S. or foreign passports, and various documents issued by the United States Citizenship and Immigration Services.

The concern of the DMV is with the proposed bill’s newly created Section 31-10.5-2(b), which requires the DMV to accept other documents as “proof of identification”, including either a signed letter from an administrator of a shelter, or a signed letter from the Administrator of the DCYF. Letters such as these, however, are accepted by the DMV as proof of **residence**, and not as proof of identity. Other states which have passed similar legislation have limited the

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legislation to the granting of fee waivers, the expansion of the criteria for documentation of proof of *residency*, and the waiver of the parental signature requirement. The DMV is unaware of any state which accepts letters from shelter administrators or the DCYF as proof of identity, and any such procedure would represent a radical departure from current best practices around the country. Therefore, the DMV respectfully requests an amendment to the proposed bill which would limit the use of these letters to proof of residency, while still maintaining that applicants must provide proof of identity, as provided for in R.I. Gen. Laws § 3-8-6.1 and 280-RICR-30-00-1.4.1.

It should be noted that the DMV already has a program in place whereby minors in DCYF care may apply for a cost-free identification card, provided that the application is signed by a DCYF primary service worker and supervisor. Proof of the minor's identity is still required, however, either by providing a copy of a birth certificate or a social security card.

The DMV looks forward to working with the sponsor going forward to draft revisions to the proposed bill that are mutually agreeable.

Thank you for your consideration.

Sincerely,



Walter R. Craddock, Esq.
Administrator

Cc: The Honorable Members of the House Committee on Judiciary
The Honorable Brian C. Newberry
Nicole McCarty, Esquire, Chief Legal Counsel to the Speaker
Thomas A. Verdi, Director, Department of Revenue