



Bipartisan Policy Center

Modernizing Voter List Maintenance: An Evidence-Based Framework for Access and Integrity

Michael Morse, Rachel Orey, Joann Bautista



SEPTEMBER 2025

Executive Summary

Voter registration lists are widely regarded as the backbone of election administration. To keep these lists up to date, election officials are responsible for identifying when voters move, die, or otherwise become ineligible to vote. The bureaucratic process known as “list maintenance” has long been a quiet feature of election administration, but has come under increasing scrutiny in recent years. Some advocacy groups equate the removal of voter registrations with disenfranchisement, labeling it voter purging; others maintain that voter lists are plagued by errors, characterizing them as “dirty,” and argue that registrations aren’t being canceled often enough.

In reality, list maintenance doesn’t need to be a trade-off between access and integrity. Rather, well-crafted, evidence-based policies can advance both goals simultaneously. This report discusses two of the most salient topics in list maintenance policy discussions today: **mobility** and **citizenship**.

Mobility and citizenship present fundamentally different types of problems for election officials. Although voters move frequently, audits have found that very few registered voters are not citizens. Nonetheless, identifying when voters move and verifying citizenship present similar types of administrative challenges for election officials, who must coordinate with other officials in their state, between states, and in the federal government to gather the most up-to-date information.

Drawing on [Michael Morse’s 2023 law review article](#), this report first addresses the recurring problem of voter mobility for list maintenance and suggests targeted reforms. It then turns to nascent efforts to verify the citizenship of voters, highlighting emerging challenges and urging caution to avoid premature policymaking.

A full list of challenges and solutions can be found in the table of contents below. Several of the most prominent and cross-cutting recommendations in the report include:

1. **Policymakers should revisit the balance between federal procedural protections and the quality of evidence that a voter has moved or is otherwise ineligible.**

For voter mobility, lengthy procedural protections required under the National Voter Registration Act (NVRA) make it hard for election officials to act quickly on even high-quality evidence that a voter has moved from their jurisdiction.

For citizenship, a relative lack of protections can mean that eligible voters get erroneously caught in efforts to identify and cancel noncitizen registrations.

2. Election officials should explore data-sharing agreements with their department of motor vehicles to backfill Social Security numbers from voters' driver's license records.

Federal privacy law has historically limited the collection of Social Security numbers (SSNs) for election administration. As a result, election officials often lack a unique national identifier for voter records. In contrast, an exception to federal privacy law allows departments of motor vehicles to maintain both driver's license numbers and Social Security numbers. To correct this imbalance, several states have successfully partnered with their department of motor vehicles to backfill SSNs from voters' driver's license records.

Increasing the availability of Social Security numbers to election officials will lead to better intra- and interstate matching of voter records and more accurate, timely lists. It will also make it easier for election officials to take advantage of systems like the Systematic Alien Verification for Entitlements (SAVE) system, run by the U.S. Citizenship and Immigration Services (USCIS). This change could also improve citizenship verification efforts in the future.

3. State policymakers should invest in technology and modernizing infrastructure at both state election offices and departments of motor vehicles.

Driver's license transactions are one of the best opportunities for election officials to learn when a voter has moved, but outdated technology at motor vehicle departments and election offices limits timely, accurate registration updates. Investing in secure, interoperable systems would improve data sharing and reduce errors.

4. Federal law should incentivize participation in an interstate data-sharing program that meets minimum standards for privacy, accuracy, and transparency.

Roughly 1 in 5 moves within the United States occur between states, making interstate data sharing crucial to the maintenance of accurate lists. And by centralizing data sharing and matching, interstate data-sharing programs often improve a state's internal list, as well.



TABLE OF CONTENTS

1 EXECUTIVE SUMMARY

5 INTRODUCTION

6 TASK FORCE ON ELECTIONS

8 CURRENT FRAMEWORK FOR LIST MAINTENANCE

8 National Voter Registration Act

10 Help America Vote Act

11 Electronic Registration Information Center

12 LIST MAINTENANCE CHALLENGES AND SOLUTIONS

12 Keeping Up with Voter Mobility

13 Challenges

13 Voter mobility is high, and voters don't typically notify election officials when they move.

13 Many voters don't file change-of-address requests with the U.S. Postal Service. When they do, there isn't always sufficient information to match them with voter registration records.

14 Election offices and motor vehicle departments often rely on outdated systems, and coordination between them is frequently lacking.

17 Election officials often lack a unique national identifier for voters, which makes it challenging to identify voters who move to another state.

20 Procedural protections require election officials to keep voters on the rolls even when they have good evidence that the voter has moved.

- 21 Solutions**
- 21 States should backfill full or partial SSNs from a voter’s driver’s license record.
- 22 States should modernize infrastructure and improve coordination between state agencies, in particular between departments of motor vehicles and election offices.
- 23 States should adopt online and automatic voter registration.
- 26 Federal law should calibrate the quality of evidence that a voter moved with the extent of procedural protections.
- 27 Federal law should incentivize election officials to update, rather than cancel, a voter’s registration when they move.
- 29 States should join, and federal law should incentivize participation in, an interstate data-sharing program that meets minimum standards for privacy.
- 32 Verifying Voter Citizenship**
- 34 Challenges**
- 34 Many eligible voters don’t have documentary proof of citizenship readily available.
- 36 Back-end verification at the state level often relies on records scattered across multiple agencies, many of which lack the technology needed for accurate, timely, and interoperable data sharing.
- 40 While promising, recent federal efforts to make the USCIS SAVE system a centralized source of citizenship information for election officials are nascent and untested.
- 49 Little consideration has been given to what procedural protections should be offered to voters flagged as noncitizens.
- 50 Solutions**
- 50 Election offices may be able to leverage motor vehicle department records to determine citizenship status.
- 50 USCIS’s SAVE system could help affirm citizenship when unclear.
- 51 Increasing the frequency of SSNs on voter registration lists may enhance election officials’ ability to verify citizenship.
- 51 Policymakers should adopt safeguards that allow voters to affirm citizenship before removal.
- 52 Policymakers should support efforts by election officials, civil society, and researchers to identify practical approaches to citizenship verification before pursuing major policy changes.

54 CONCLUSION



Introduction

Voter registration lists are widely regarded as the “backbone of election administration.”¹ These lists serve multiple essential functions: They identify who is eligible to vote, assign voters to appropriate administrative precincts and political jurisdictions, and facilitate outreach efforts by election officials and campaigns alike.²

Drawing directly from and building on Michael Morse’s 2023 law review article, “Democracy’s Bureaucracy: The Complicated Case of Voter Registration Lists,” this joint report seeks to clarify the often-misunderstood role of “voter list maintenance.”³ The term describes the process by which election officials identify when voters have moved, died, or otherwise become ineligible to vote, often by matching administrative data or coordinating across agencies.

List maintenance has come under increasing scrutiny in recent years. Some argue that bloated rolls are proof of fraud or mismanagement, while others warn that efforts to “clean” lists can veer into wrongful disenfranchisement.

We argue that list maintenance does not need to be a trade-off between voter access and election integrity, but rather that good list maintenance policy can advance both goals in tandem.

Our report identifies the challenges that election administrators encounter in conducting list maintenance and outlines potential bipartisan solutions. We focus primarily on the challenges that voter mobility poses to list maintenance, an area with a well-established policy conversation and decades of ongoing research. We note that modest reforms to state administrative practice, state law, and federal law could improve both the accuracy and completeness of voter registration lists.

We then examine the growing pressure on election officials to verify voters’ citizenship, an area with a rapidly growing but relatively nascent research and policy focus. As such, we urge caution when considering reforms relating to citizenship verification, and we encourage further research and deliberation before policymakers undertake significant policy changes.

¹ Stephen Ansolabehere and Eitan Hersh, *The Quality of Voter Registration Records: A State-by-State Analysis*, working paper, Institute for Quantitative Social Science, Harvard University, and Caltech/MIT Voting Technology Project, July 14, 2010. Available at: https://vote.caltech.edu/documents/187/reg_quality_report_8-5-10.pdf.

² Ibid.; Daron Shaw, Stephen Ansolabehere, and Charles Stewart, “A Brief Yet Practical Guide to Reforming U.S. Voter Registration Systems,” *Election Law Journal: Rules, Politics, and Policy*, 14(1): 26–31, 2015. Available at: <https://hdl.handle.net/1721.1/128555>.

³ Michael Morse, “Democracy’s Bureaucracy: The Complicated Case of Voter Registration Lists,” *Boston University Law Review*, 103: 2, 123, 2023. Available at: <https://ssrn.com/abstract=4396446>.

Task Force on Elections

This report is unanimously endorsed by the Bipartisan Policy Center’s Task Force on Elections, a bipartisan group of state and local election officials from jurisdictions throughout the United States. As the public servants responsible for the day-to-day work of election administration, election officials have specialized knowledge of how the increasingly complex elections ecosystem functions. Their input is crucial to, yet is all too often excluded from, election policy conversations. The Task Force on Elections works to bridge that gap.

The Task Force on Elections includes 41 state and local election officials from 26 states who are devoted to making meaningful improvements to U.S. elections. The report builds on the task force’s extensive body of work, including eight task force-endorsed reports on all aspects of election administration policy:

- [Policy to Carry Us Beyond the Next Election](#)
- [Logical Election Policy](#)
- [Improving the Voting Experience After 2020](#)
- [Bipartisan Principles for Election Audits](#)
- [Policy to Advance Good Faith Election Observation](#)
- [Balancing Security, Access, and Privacy in Electronic Ballot Transmission](#)
- [Ballot Tabulators Are Essential to Election Integrity](#)
- [Closing Security Gaps in Poll Worker Policy](#)

Although some members may have concerns about particular recommendations, their endorsement pertains to the set of recommendations as a whole.

In addition to the members listed below, this report was crafted with input from and the endorsement of the Task Force on Elections Advisory Council, composed of industry experts and former election officials from a variety of states and with different political affiliations.

Members of the task force are:

Christina Adkins	Director of Elections, Texas
Natalie Adona	Registrar of Voters, Marin County, California
Jacqueline (Jackie) Beaudry	City Clerk, Ann Arbor, Michigan
Noah Beck	Director of Elections and Registration, Polk County, Georgia
Seth Bluestein	City Commissioner, Philadelphia, Pennsylvania
Maureen Bugdon	Superintendent of Elections, Atlantic County, New Jersey

Bryan Caskey	Director of Elections, Kansas
Judd Choate	Director, Division of Elections, Colorado State Department
Katharine Clark	Clerk, Santa Fe County, New Mexico
Thomas Connolly	Deputy Executive Director, New York State Board of Elections
Isaac Cramer	Executive Director, Charleston County Board of Elections, South Carolina
Mark Earley	Supervisor of Elections, Leon County, Florida
Scott Erickson	County Clerk, Knox County, Illinois
Monica Evans	Executive Director, DC Board of Elections
Joanna Francescut	Assistant County Clerk/Registrar of Voters, Shasta County, California
Jennifer Garms	County Auditor & Commissioner of Elections, Clayton County, Iowa
Jackie Harris	Chief Deputy Registrar, Nelson County, Virginia
Ricky Hatch	Clerk Auditor, Weber County, Utah
Stuart Holmes	Director of Elections, Washington
Scott Jarrett	Director of Elections, Maricopa County, Arizona
Sarah B. Johnson	City Clerk, Colorado Springs, Colorado
Joseph Kirk	Election Supervisor, Bartow County, Georgia
Carly Koppes	Clerk and Recorder, Weld County, Colorado
Sara LaVere	Director of Elections, Brunswick County, North Carolina
Julie Leathers Stahl	Director, Wayne County Board of Elections, Ohio
Debra Lee	County Clerk, Laramie County, Wyoming
Brianna Lennon	County Clerk, Boone County, Missouri
Dana Lewis	Recorder, Pinal County, Arizona
Nicholas Lima	Registrar/Director of Elections, City of Cranston, Rhode Island
Amanda Lopez Askin	Clerk, Doña Ana County, New Mexico
Brian McKenzie	Clerk, Davis County, Utah
Kevin Mooney	Clerk, Bullitt County, Kentucky
Sherry Poland	Director of Elections, Hamilton County, Ohio
Justin Roebuck	Clerk and Register of Deeds, Ottawa County, and Chair of the Michigan Council of Election Officials, Michigan
Joe Rozell	Director of Elections, Oakland County, Michigan
Jamie Shew	Clerk, Douglas County, Kansas
Tammy Smith	Administrator of Elections, Wilson County, Tennessee
Michelle Tassinari	First Deputy Secretary, Director and Legal Counsel, Elections Division, Office of the Massachusetts Secretary of the Commonwealth
Eneida Tavares	Chair, Boston Election Commission, Massachusetts
Mandy Vigil	State Election Director, New Mexico
Meagan Wolfe	Administrator, Wisconsin Elections Commission

Current Framework for List Maintenance

In general, states are responsible for the bulk of election administration; however, the U.S. Constitution gives Congress the ultimate authority to set the “Times, Places and Manner” of federal elections.⁴ Congress does not have the authority to regulate state elections, but in practice, states typically run “unitary elections”⁵—applying federal election law to state and local elections to avoid running separate elections under different legal frameworks.

The National Voter Registration Act (NVRA) of 1993 and the Help America Vote Act (HAVA) of 2002 are the two primary federal laws that govern voter registration and list maintenance. Yet, neither the NVRA nor HAVA addresses how election officials might share information about voters who move across state lines. Beginning in the early 2000s, state chief election officials took on the task themselves by forging their own “cross-governmental bureaucracies.”⁶

Below, we summarize each element of the current framework for list maintenance.

NATIONAL VOTER REGISTRATION ACT

Congress wrote the NVRA to advance both voter access and election integrity.⁷ The legislation sought to increase the number of eligible citizens registered to vote and to ensure that voter registration lists remained accurate and current.⁸ In general, the NVRA:⁹

- **Establishes uniform methods for voter registration.**¹⁰
 - Individuals can simultaneously register to vote when they apply for a driver’s license and update their registration when they update the address listed on their driver’s license.¹¹ These provisions are often referred to as “Motor Voter.”

⁴ U.S. Constitution, Article I, Section 4. For more on the constitutional allocation of election authority, see Michael Morse, “Democracy’s Bureaucracy: The Complicated Case of Voter Registration Lists,” *Boston University Law Review*, 103: 2,133-36, 2023. Available at: <https://ssrn.com/abstract=4396446>.

⁵ Michael Morley, “Dismantling the Unitary Electoral System? Uncooperative Federalism in State and Local Elections,” *Northwestern University Law Review Online*, 111: 103, March 5, 2016. Available at: <https://ssrn.com/abstract=2742719>.

⁶ For the origin of the term, see Bridget A. Fahey, “Data Federalism,” *Harvard Law Review*, 135: 1,007, 2022. Available at: <https://harvardlawreview.org/print/vol-135/data-federalism/>.

⁷ For more on the NVRA’s statutory framework, see Michael Morse, “Democracy’s Bureaucracy: The Complicated Case of Voter Registration Lists,” *Boston University Law Review*, 103: 2,138-44, 2023. Available at: <https://ssrn.com/abstract=4396446>.

⁸ [52 U.S.C. § 20501\(b\)](#).

⁹ The NVRA exempts certain states with no registration requirement (North Dakota) or that had same-day voter registration on August 1, 1994, the day the law became effective (Idaho, Minnesota, New Hampshire, Wisconsin, and Wyoming). See [52 U.S.C. § 20503\(b\)](#).

¹⁰ [52 U.S.C. § 20503\(a\)](#).

¹¹ [52 U.S.C. § 20504](#).

- Individuals can also use a federal form to register to vote by mail, which states must “accept and use.”¹²
- Finally, individuals can register to vote at designated sites, including all offices that provide public assistance or that primarily provide services to persons with disabilities.¹³
- **Establishes a “general program” for list maintenance.**
 - Election officials must “conduct a general program that makes a reasonable effort” to identify and remove registrants who become ineligible due to death or change of residence, although the NVRA does not mandate how this program must be structured.¹⁴
 - The NVRA establishes a detailed procedural framework specifically for election officials when they believe a registrant may have potentially moved:¹⁵
 - Election officials must send an official notice to confirm the move.
 - If a voter confirms their move, election officials can remove the registration immediately.
 - If a voter moves within the same registrar’s jurisdiction, election officials must update the registration list accordingly and may not remove the voter from the rolls due to that change alone.
 - If no response is received, election officials cannot remove the registration immediately. Instead, election officials must allow the registrant to continue to vote until after the second general election since the initial notice. If the registrant does not show up to vote in the interim period, election officials may then remove the registration.

Figure 1 below summarizes the multistep list maintenance process for a change of address. It shows that the list maintenance process is substantially simpler in the event of a registrant’s death, mental incapacity, criminal conviction, or request to be removed.

Figure 1 does not include what might happen if an election official determines that a particular registrant is not a citizen. As discussed in more detail below, the NVRA offers no specific framework for what constitutes evidence of noncitizenship and what protections should be offered to voters flagged as potential noncitizens.

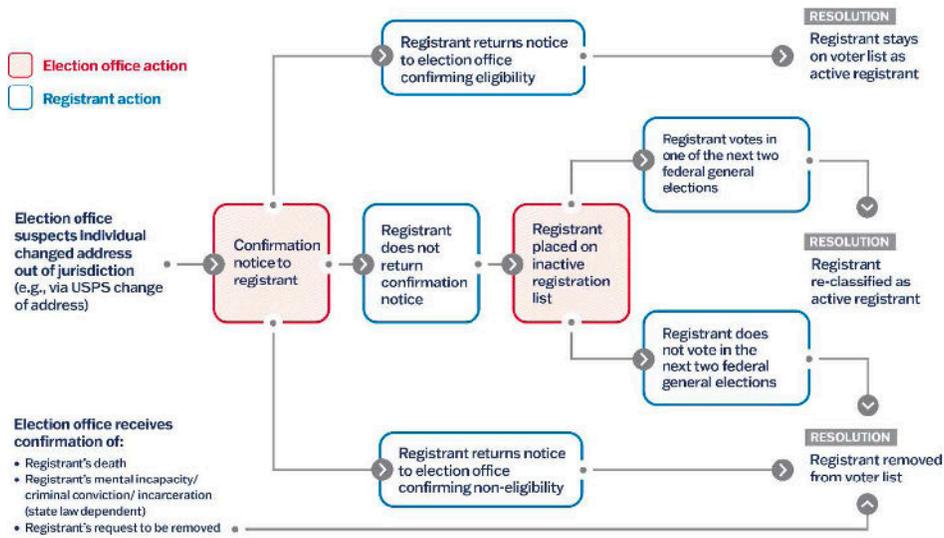
¹² [52 U.S.C. § 20505\(a\)\(1\).](#)

¹³ [52 U.S.C. § 20506.](#)

¹⁴ [52 U.S.C. § 20507\(a\)\(4\).](#)

¹⁵ [52 U.S.C. § 20507\(d\).](#)

Figure 1: Election Assistance Commission’s Summary of the NVRA’s List Maintenance Process¹⁶



HELP AMERICA VOTE ACT

After the National Voter Registration Act became law, HAVA took partial steps toward centralizing voter registration.¹⁷ Beginning in 2004, it required states to implement a single statewide electronic voter registration list.¹⁸ As is relevant here, HAVA additionally:

- **Requires that each voter be assigned a unique identifying number in the state voter registration list.**¹⁹ To facilitate this, HAVA requires that voter registration applications include the applicant’s driver’s license number (if they have been issued one) or the last four digits of their SSN if not.²⁰ It also outlines a special rule for voters who haven’t been issued a driver’s license or SSN.²¹

¹⁶ U.S. Election Assistance Commission, *Election Administration and Voting Survey 2024 Comprehensive Report* (2025), fig. 6, “The NVRA’s Voter Registration List Maintenance Process,” 149. Available at: https://www.eac.gov/sites/default/files/2025-07/2024_EAVS_Report_508.pdf.

¹⁷ For more on HAVA’s statutory framework, see Michael Morse, “Democracy’s Bureaucracy: The Complicated Case of Voter Registration Lists,” *Boston University Law Review*, 103: 2, 144-45, 2023. Available at: <https://ssrn.com/abstract=4396446>.

¹⁸ States that notified the Election Assistance Commission that they would not meet the January 1, 2004, deadline with good cause were given until January 1, 2006, to meet the requirement. 52 U.S.C. § 21083(d)(1)(A)–(B).

¹⁹ [52 U.S.C. § 21083\(a\)\(1\)\(A\)](#).

²⁰ [52 U.S.C. § 21083\(a\)\(5\)\(A\)\(i\)](#).

²¹ [52 U.S.C. § 21083\(a\)\(5\)\(A\)\(ii\)](#).

- **Requires that each state’s chief election official enter into an information-sharing agreement with their department of motor vehicles.**²² The two state officials are required to match information in their respective databases to verify the accuracy of information provided on voter registration applications.
- **Requires the federal commissioner of Social Security to develop a process for verifying the accuracy of voter registration applications completed with SSNs.**²³ Given that departments of motor vehicles do not have information about voters without a driver’s license number, HAVA requires that departments of motor vehicles coordinate with the Social Security Administration to verify an applicant’s name, date of birth, and SSN, as well as whether they are deceased. Today, this function is carried out through the Help America Vote Verification (HAVV) system.²⁴

ELECTRONIC REGISTRATION INFORMATION CENTER

As states adopted statewide electronic voter registration lists, state chief election officials began to take on the task of interstate data sharing themselves. They first established Crosscheck (a program elaborated in detail later in this report) and then the Electronic Registration Information Center (ERIC), which continues to operate today.²⁵

ERIC is the largest interstate data-sharing program currently in operation. It operates as a nonprofit corporation run by member states via a set of bylaws and an accompanying membership agreement. Although ERIC membership has long been bipartisan, it has become politically controversial in some states in recent years.²⁶ Nonetheless, it still provides a helpful framework for understanding how such programs can work in practice.

At its core, ERIC supplements the bureaucratic capacity of election officials to conduct list maintenance both across and within states. In general, ERIC brings together multiple relevant data sources—including a state’s voter registration and motor vehicle records, federal death records, and change-of-address requests filed with the U.S. Postal Service—to aid its members in fulfilling different list maintenance tasks, including identifying:

²² [52 U.S.C. § 21083\(a\)\(5\)\(B\)\(i\).](#)

²³ [52 U.S.C. § 21083\(a\)\(5\)\(B\)\(ii\).](#)

²⁴ Social Security Administration, “SSA Open Data | HAVV Transactions by State,” n.d., accessed July 14, 2025. Available at: <https://www.ssa.gov/data/havv/>.

²⁵ For a comprehensive account of both Crosscheck and ERIC, see Michael Morse, “Democracy’s Bureaucracy: The Complicated Case of Voter Registration Lists,” *Boston University Law Review*, 103: 2, 145-61, 2023. Available at: <https://ssrn.com/abstract=4396446>.

²⁶ Carrie Levine, “States’ Withdrawals Weaken ERIC and Show Conspiracy Theories Taking Deep Root,” *Votebeat*, March 13, 2023. Available at: <https://www.votebeat.org/2023/3/13/23634072/eric-election-integrity-activists-clean-voter-rolls/>.

- Voters who moved from one state to another.
- Voters who have moved within the same state.
- Voters who have died within or outside of a state.

As discussed below, some of these tasks overlap with a state’s obligations under the NVRA while others go beyond the federal framework.

List Maintenance Challenges and Solutions

This section outlines particular list maintenance challenges for election officials. Drawing on Morse’s 2023 law review article, it first summarizes the recurring problem of voter mobility for maintaining accurate and complete voter registration lists. It then expands the focus to consider nascent efforts to verify the citizenship of voters.

We suggest particular reforms to address voter mobility and urge caution when considering nascent efforts toward citizenship verification.

KEEPING UP WITH VOTER MOBILITY

In the United States, a voter’s registration is tied to their residential address because where we live determines which local, state, and federal officials represent us. The difficulty with local political districts, from an election administrative perspective, is that mobility can break the link between a voter’s registration and their residence. In general, mobility can affect voter lists in two key ways:

1. It can result in **incomplete lists** in a voter’s new jurisdiction.
2. It can leave **outdated records** behind in their former jurisdiction.

Although somewhat dated, the best available evidence suggests that about 25% of eligible citizens are not registered to vote and about 10% of voters are not registered at their current address.²⁷ Further, the majority of people who are no longer living at their registered address moved within the past year.²⁸ Below, we outline how mobility presents a series of interrelated challenges for election officials.²⁹

²⁷ Simon Jackman and Bradley Spahn, “Politically Invisible in America,” *PS: Political Science & Politics*, 54: 623–25, 2021, table 1, estimating the percentage of citizens who are registered, unregistered, “mislisted,” and “unlisted” by matching respondents in the 2012 American National Election Survey to nationwide commercial voter files.

²⁸ *Ibid.*, 626, fig. 1.

²⁹ For a fuller discussion of these challenges, see Michael Morse, “Democracy’s Bureaucracy: The Complicated Case of Voter Registration Lists,” *Boston University Law Review*, 103: 2,162-81, 2023. Available at: <https://ssrn.com/abstract=4396446>.

Challenges

Voter mobility is high, and voters don't typically notify election officials when they move.

To start, Americans are highly mobile: In 2022 alone, approximately 28.2 million people (8.7% of the U.S. population) moved.³⁰

But few voters request that their former jurisdiction cancel their registration when they move, nor are they required to. In fact, only 2.6% of all voter registration removals that occurred between 2022 and 2024 were triggered by a voter's request.³¹

Many election officials have acknowledged that relying on self-reporting by voters is not an effective way to update addresses. For example, in their 2022 annual list maintenance report, Virginia election officials noted that self-reporting "has not previously been an efficient method to remove voters" from the rolls.³²

One explanation for the dearth of self-reporting is the lack of awareness about how voter registration updates work. According to the Cooperative Congressional Election Study of 2008, 1 in 4 voters wrongly believed their registration would be updated automatically when they moved, either by election officials or the Postal Service.³³ More than half were unaware that they could update their voter registration at state motor vehicle agencies.³⁴

Many voters don't file change-of-address requests with the U.S. Postal Service. When they do, there isn't always sufficient information to match them with voter registration records.

Given voter behavior, the accuracy of voter lists depends on the availability and quality of administrative data about voters' current addresses.

The National Change of Address (NCOA) list is one of the most commonly utilized data sources for list maintenance.³⁵ The Postal Service compiles the NCOA list from change-of-address requests submitted by individuals. This list was designed to support efficient mail forwarding, but the NVRA encourages

³⁰ U.S. Census Bureau, "Change in Marital Status Became More Common Reason for Moving from 2021 to 2022, Housing/Neighborhood Improvement Reasons Declined," November 1, 2023. Available at: <https://www.census.gov/library/stories/2023/09/why-people-move.html>.

³¹ U.S. Election Assistance Commission, *Election Administration and Voting Survey 2024 Comprehensive Report*, fig. 7, "Three Removal Reasons Accounted for the Majority of the Voter Registration Removals," 153, 2025. Available at: https://www.eac.gov/sites/default/files/2025-07/2024_EAVS_Report_508.pdf.

³² Virginia Department of Elections, "Annual List Maintenance Report," 2021. Available at: https://www.elections.virginia.gov/media/formswarehouse/maintenance-reports/2022-List-Maintenance-Report_final.pdf.

³³ Pew Charitable Trusts, "Inaccurate, Costly, and Inefficient," February 14, 2012. Available at: <https://www.pew.org/en/research-and-analysis/reports/2012/02/14/inaccurate-costly-and-inefficient-evidence-that-americas-voter-registration-system-needs-an-upgrade>.

³⁴ Ibid.

³⁵ U.S. Election Assistance Commission, *Election Administration and Voting Survey 2024 Comprehensive Report*, table 2, "States That Send Out Confirmation Notices Most Often Use the State Vital Statistics Office and Reports from Other States to Identify Ineligible Voters," 70, 2025. Available at: https://www.eac.gov/sites/default/files/2025-07/2024_EAVS_Report_508.pdf.

election officials to use it for list maintenance, too.³⁶ Overall, **38 states** use the NCOA list to identify movers.³⁷

Despite its importance, the NCOA list presents several challenges for election officials:

- Not all movers submit a change-of-address request, so many address changes are never captured in the NCOA list. For example, of all the voters identified as having moved out of Orange County, CA, less than a quarter had filed a change-of-address request with the Postal Service.³⁸
- Election officials can find it difficult to confirm that a change-of-address record belongs to a specific voter.
 - Change-of-address requests do not include a voter’s date of birth or their SSN.
 - For another, individuals can file a single change-of-address request for an entire household, making it difficult to tie a change-of-address to an individual voter.
- Some voters who file a change-of-address request do not intend to update their registration.
 - The change-of-address form does not notify voters that their request could affect their registration, so some simply want to redirect their mail without realizing that election officials may interpret the request as a signal to alter their voter registration status.
 - Further, individuals might file a temporary change-of-address (for example, if traveling or living elsewhere for a prolonged but temporary period) and do not intend to change their voter registration.

These limitations illustrate a broader challenge in modern list maintenance: Election officials must rely on third-party data sources that were not designed for election administration.

Election offices and motor vehicle departments often rely on outdated systems, and coordination between them is frequently lacking.

The National Voter Registration Act envisions motor vehicle departments serving an important role in election administration, particularly for voters who do not communicate a move directly to election officials or to the Postal

³⁶ [52 U.S.C. § 20507\(c\)\(1\)](#).

³⁷ U.S. Election Assistance Commission, *2024 Policy Survey*, version 1.0, released June 30, 2025. Available at: <https://www.eac.gov/research-and-data/studies-and-reports>; author’s analysis of Q19_11 data.

³⁸ Orange County Registrar of Voters, *2020 Voter List Maintenance Report*, graph 2, “Cancellation by Method,” 14, 2020. Available at: <https://ocvote.gov/election-library/docs/2020%20Voter%20List%20Maintenance%20Report.pdf>.

Service. Indeed, the majority of voter registration transactions originate at a motor vehicle agency.³⁹

In theory, the NVRA's Motor Voter provisions should allow election officials to capture most in-state moves because voters typically do update their driver's license—even if they are unlikely to report a move directly to election officials or to file a change-of-address request. In fact, state law often requires individuals to update their driver's license when they move.⁴⁰ In practice, the connections between departments of motor vehicles and election offices are technologically and administratively fragmented, leading voter registration lists to miss many in-state moves.⁴¹

Morse (2023) suggests that data from ERIC provides evidence of problems with this aspect of the National Voter Registration Act. As is relevant here, ERIC helps member states identify in-state moves by comparing voter registration records and driver's license records from the same state. Since its launch in 2013, ERIC has identified **over 28 million individuals** who were registered to vote at an address that was less current than the address on their driver's license.⁴² Under Motor Voter, we would expect most of these address changes to have been transmitted directly to election officials for an update unless the voter opted out from doing so.

It is unclear what is driving this shortfall, but it's possible that outdated infrastructure and poor coordination play a key role.⁴³ As one member of BPC's task force explained, the problem often stems from the fact that a motor vehicle department change-of-address record doesn't always match up neatly with the information in a voter registration record. In some cases, the prior motor vehicle department address doesn't correspond to the voter's registration address, and not all voter records contain a driver's license number—or if they do, the number may have changed—making it difficult to confidently link the records.

³⁹ U.S. Election Assistance Commission, *Election Administration and Voting Survey 2024 Comprehensive Report*, fig. 3, "Registration Transactions from Motor Vehicle Offices and Automatic Voter Registration Account for More than Half of Registration Transactions," 138, 2025. Available at: https://www.eac.gov/sites/default/files/2025-07/2024_EAVS_Report_508.pdf.

⁴⁰ For example, "Residents of Pennsylvania are required by law to report their change of address within 15 days of moving." Pennsylvania Department of Transportation, "Moving within PA," accessed August 15, 2025. Available at: <https://www.pa.gov/agencies/dmv/resources/relocation/moving-within-pa>.

⁴¹ See Michael Morse, "Democracy's Bureaucracy: The Complicated Case of Voter Registration Lists," *Boston University Law Review*, 103: 2, 143, 2023. Available at: <https://ssrn.com/abstract=4396446>.

⁴² "Statistics," ERIC Inc., 2025, accessed July 9, 2025. Available at: <https://ericstates.org/statistics/>.

⁴³ Morse, "Democracy's Bureaucracy," 2023, also noted that some Motor Vehicles Departments may be failing to fulfill their NVRA obligations. Presidential Commission on Election Administration, *The American Voting Experience: Report and Recommendations of the Presidential Commission on Election Administration* (Washington, DC: Presidential Commission on Election Administration, 2014), 17 (detailing ways in which DMVs create obstacles to transfer of registration data and cause preventable inaccuracies in voter registration lists). Over a series of subsequent reports, Stuart Naifeh documented the continued lack of motor-voter compliance. For example, in his 2014 survey, some state DMVs did not properly treat the change-of-address procedure as an opt-out procedure and some election officials only updated the voter's registration address when they moved within a county, but not across counties. Stuart Naifeh, *Driving the Vote* (New York: Dēmos, 2015), 40, table 4 (identifying which states use opt-out or opt-in procedure); *ibid.*, 42, table 5 (identifying how different states treat address changes). Naifeh recently confirmed the latter problem was still an issue. Stuart Naifeh, *Keeping Pace with Motor Voter* (New York: Dēmos, 2021), 15 (identifying a state which, in 2018, had approximately 400,000 voter registrations with addresses not matching records kept by DMV).

Underpinning this challenge is the reality that many motor vehicle agencies are relying on computer systems that were built in the 1960s and 1970s—long before voter registration became an important part of motor vehicle departments’ mission and which use outdated and unsupported programming languages.⁴⁴ Outdated infrastructure makes obtaining and transmitting accurate voter information to election offices all the more challenging.

Across the country, motor vehicle departments face similar challenges. One member of BPC’s task force noted that although their state is exempt from the NVRA, “many of the challenges and issues that plague most states affect us, too. We don’t get a ‘pass.’ [Our department of motor vehicles’ information system] is outdated and operates on a COBOL/CICS mainframe system that is impossible to maintain. Legislators kicked the can down the road for many years before finally agreeing to fund a wholesale upgrade.”

Technological limitations aren’t limited to motor vehicle departments; the platforms that election officials utilize for their statewide, computerized lists are often just as outdated.

For example, Pennsylvania’s Statewide Uniform Registry of Electors (SURE), built in the early 2000s, has long been criticized for unreliability. A 2019 performance audit conducted by the state’s auditor general found that “voter record information is inaccurate due to weaknesses in the voter registration application process and the maintenance of voter records in the SURE system.”⁴⁵ The audit cited missing or inadequate features that lead to what would otherwise be avoidable errors, including:

- No prevention of applications with non-Pennsylvania residential addresses.
- Lack of geographical mapping to ensure applications are sent to the correct county.
- No “Read Only” feature for voter information that should not be edited without additional supervisory review and approval, such as birth date and SSN.
- No controls to prevent improper cancellations within 90 days of an election.

⁴⁴ American Association of Motor Vehicle Administrators, “System Modernization Best Practices,” May 2017. Available at: <https://www.aamva.org/getmedia/2c300624-1ddc-4bf1-8b99-5c71763cabaa/System-Modernization-Best-Practices.pdf>.

⁴⁵ Department of the Auditor General, “Performance Audit Report: Department of State – Statewide Uniform Registry of Electors,” Commonwealth of Pennsylvania, 2019. Available at: https://www.paauditor.gov/wp-content/uploads/audits-archive/Media/Default/Reports/Department%20of%20State_SURE%20Audit%20Report%2012-19-19.pdf.

As Votebeat reported, “Local election officials complain that the system is outdated and has a tendency to crash, sometimes in the critical period just before an election when counties need it the most.”⁴⁶

Pennsylvania’s Department of State has been working for years to upgrade the SURE system, but that upgrade has been mired in difficulty.⁴⁷

“The department initially sought bids to replace SURE in 2019, and in December 2020 it signed a \$10.7 million contract with South Dakota-based elections software company BPro Inc.”

“The project was scheduled to wrap up by early 2023, so that the new system would be in place for the 2024 presidential election. But delays pushed the projected rollout into this year. In December 2023, the company and the Department of State agreed to cancel the contract, the department said, after it concluded that the company ‘will not meet those timelines and contractual standards,’ according to an email sent to counties at the time.”

The Department of State has since signed a contract with a new vendor, but the difficulty it faced identifying a vendor that can meet all necessary requirements highlights the sheer complexity of upgrading a voter registration system.

Challenges created by antiquated motor vehicle department and election office systems are compounded when those systems must interact. An audit of Arizona’s voter registration system commissioned by Arizona Gov. Katie Hobbs reported that “voter registration and [motor vehicle department] business practices are both complex, highly regulated areas that serve distinct purposes. Throughout our historic review, we found that statutory changes in one area failed to contemplate the challenges imposed by the changes to the other.”⁴⁸

Election officials often lack a unique national identifier for voters, which makes it challenging to identify voters who move to another state.

Roughly 1 in 5 moves within the United States occur between states.⁴⁹ But the lack of a unique, national identifier for voters makes identifying cross-state moves more difficult than in-state moves.

⁴⁶ Carter Walker, “Pennsylvania Signs New Contract to Upgrade SURE Voter Registration System,” *Votebeat*, March 5, 2025. Available at: <https://www.votebeat.org/pennsylvania/2025/03/05/sure-upgrade-voter-registration-system-new-contract-signed/>.

⁴⁷ Carter Walker, “Replacing PA’s Outdated Voter Registration System Months Behind Schedule,” *Spotlight PA*, January 30, 2025. Available at: <https://www.spotlightpa.org/news/2025/01/pennsylvania-election-voter-registration-system-delayed-upgrades/>.

⁴⁸ Arizona Motor Vehicle Division, in consultation with Robyn Stallworth-Pouquette, former Yuma County Recorder, and Patty Hansen, former Coconino County Recorder, *Report on Audit of MVD’s Authorized Presence Policy and Data for Voter Registration Purposes*, prepared for the Office of the Arizona Governor Katie Hobbs, January 31, 2025. Available at: <https://s3.documentcloud.org/documents/25510724/hobbs-mvd-audit.pdf>.

⁴⁹ U.S. Census Bureau, “Change in Marital Status Became More Common Reason for Moving from 2021 to 2022, Housing/Neighborhood Improvement Reasons Declined,” November 1, 2023. Available at: <https://www.census.gov/library/stories/2023/09/why-people-move.html>.

By design, Social Security numbers could serve as a unique identifier that transcends state lines. However, the Privacy Act of 1974 prohibits government agencies from denying services based on an individual’s refusal to disclose their full SSN.⁵⁰ Even in the absence of a full Social Security number, the combination of name, date of birth, and last four digits of an SSN (SSN4) can also be a reliable way to distinguish between distinct individuals.⁵¹ However, as summarized above, HAVA prioritized the collection of a voter’s driver’s license number over their SSN4 to accommodate privacy concerns.

As a result, many voters do not have a full or partial SSN associated with their registration record.⁵² For example, **just 66% of voters** in Wyoming have an SSN4 associated with their record.⁵³ One county in Iowa reported that **only 56% of voters** have a full or partial SSN associated with their record, and that number is likely similar across the state.⁵⁴

Making matters worse, there is no national standard for how states structure their voter lists. Fields such as name formatting, address conventions, and even the definitions of dates vary from one state to another. This lack of a uniform, interoperable template makes comparing or integrating records across jurisdictions difficult and resource intensive. Without consistent “latest activity” dates, for example, it becomes difficult to identify which state a voter should be registered in if it’s unclear where their most recent address change was.⁵⁵

In the absence of a national identifier or a consistent record structure, cross-state comparisons tend to overestimate the prevalence of duplicate registrations while occasionally missing actual duplicates. This is especially the case when publicly available voter lists are compared, because they typically lack identifiers such as an SSN4 or a date of birth.⁵⁶

⁵⁰ Privacy Act of 1974, Pub. L. No. 93-579, § 7(a), 88 Stat. 1896, 1909.

⁵¹ Sharad Goel, Marc Meredith, et al., “One Person, One Vote: Estimating the Prevalence of Double Voting in U.S. Presidential Elections,” *American Political Science Review*, 114(2): 456–69, March 6, 2020. Available at: <https://doi.org/10.1017/s000305541900087x>.

⁵² One state reported to BPC that its voter registration system doesn’t even have the capability to store both a driver’s license or ID number and an SSN for a voter; officials must enter one or the other.

⁵³ Email interview by the authors with Debra Lee, Laramie County clerk, WY, July 2025.

⁵⁴ Email interview by the authors with an Iowa county clerk, August 2025.

⁵⁵ For more “uniformity obstacles,” see Michael Morse, “Democracy’s Bureaucracy: The Complicated Case of Voter Registration Lists,” *Boston University Law Review*, 103: 2, 167, 2023. Available at: <https://ssrn.com/abstract=4396446>.

⁵⁶ “States have varied requirements on who is eligible to request a list of voters, what information the list contains, what information is kept confidential and how the information contained in voter lists may be used. The availability of voter lists for campaign purposes is longstanding; candidates benefit from knowing who their party’s voters are. However, not every record is publicly available.” National Conference of State Legislatures, “Access to and Use of Voter Registration Lists,” updated July 17, 2025. Available at: <https://www.ncsl.org/elections-and-campaigns/access-to-and-use-of-voter-registration-lists>.

Case Study: Crosscheck

The now-defunct Interstate Voter Registration Crosscheck Program (Crosscheck) offers a cautionary tale about what can go wrong when voter data is compared across states without a unique identifier.

Crosscheck was designed to identify voters registered in multiple states by comparing records using only basic fields: first name, last name, and date of birth. Social Security numbers were not required and often unavailable; only “roughly a third” of Crosscheck records had SSN4.⁵⁷

The program’s shortcomings are detailed in Goel, Meredith, et al. (2020).⁵⁸ Table 1 reproduces one part of their analysis showing that Crosscheck identified 100,140 pairs of registrations between Iowa and participating states with the same first name, last name, and date of birth in 2012.

Figure 2: Goel, Meredith, et al. Study of Crosscheck Results between Iowa and Participating States

Which information matched?				How many matches?			
Required			Optional	2012		2014	
First	Last	DOB	SSN4	#	%	#	%
Yes	Yes	Yes	Not Possible	65,240	65%	90,378	65%
Yes	Yes	Yes	Yes	25,987	26%	34,189	25%
Yes	Yes	Yes	No	8,913	9%	14,766	11%

The first row shows that 65,240 pairs, or 65%, did not have SSN4 information for either matched registration. As a result, election officials could not easily confirm whether these registrations were duplicates or simply shared the same name and birthdate. When SSN4s were available in both records, only 74% of those pairs matched on SSN4, indicating that about a quarter of name-and-birthdate matches were actually distinct individuals.

This illustrates the central risk of comparing lists across states without sufficient matching information: Comparing voter lists without a unique identifier is likely to generate hundreds of thousands of false positives, giving the illusion of duplicate registration and voting where it doesn’t exist.

⁵⁷ Kris Kobach, testimony on the Interstate Voter Registration Crosscheck Program before the Presidential Commission on Election Administration, September 20, 2013, 35. Available at: <https://web.mit.edu/supportthevoter/www/files/2013/11/PCEA-Cincinnati-Public-Meeting-Transcript-Day-2.pdf>, archived at <https://perma.cc/FS58-DBGY>.

⁵⁸ Sharad Goel, Marc Meredith, et al., “One Person, One Vote: Estimating the Prevalence of Double Voting in U.S. Presidential Elections,” *American Political Science Review*, 114(2): 456–469, May 2020. Available at: <https://doi.org/10.1017/S000305541900087X>.

Procedural protections require election officials to keep voters on the rolls even when they have good evidence that the voter has moved.

Even when election officials have credible evidence that a voter has moved, the NVRA constrains officials' ability to act on it swiftly.

One of the most significant omissions in the NVRA is its failure to define a **minimum substantive standard** for list maintenance. In *Husted v. A. Philip Randolph Institute*, the Supreme Court clarified that the NVRA requires no "particular quantum of evidence of a change of residence" to begin the cancellation process.⁵⁹ As a result, there is no legal distinction between weak indicators that a voter moved—such as undeliverable mail or nonvoting—and more robust indicators, such as address matches through ERIC or state motor vehicle records.

Lacking substantive standards, the NVRA uses **procedural protections** to guard against disenfranchisement. Before election officials remove any voter from the rolls because of a suspected move, they first send a notice to confirm the change of address. The problem is that the vast majority of voters (69.7%) do not return confirmation notices.⁶⁰ When that happens, election officials must typically wait between two and four years to remove the voter from the rolls—the period from the mailing of the notice to the second general federal election.

In theory, the extended delay offers voters another opportunity to confirm their address by voting in the interim elections. In practice, lists remain artificially inflated long after voters have moved. In Michigan, for instance, election officials reported 8.2 million registered voters in 2022, even though only 7.6 million residents were old enough to vote. The explanation is benign: Approximately 11% of the list is composed of registrants in the slow process of removal under the NVRA's timeline.⁶¹

The consequences are twofold:

1. Many on the left have understandably little confidence in a list maintenance process that lacks a minimum substantive standard and fear that the NVRA's procedural protections may be too weak to prevent wrongful removals. From this perspective, a voter might be removed from the rolls because they failed to vote in an election and did not respond to a subsequent confirmation notice.

⁵⁹ 138 S. Ct. 1833, 1847 (2018).

⁶⁰ U.S. Election Assistance Commission, *Election Administration and Voting Survey 2024 Comprehensive Report*, table 1, "Most Confirmation Notices Sent Were Unreturned by Voters," 151, 2025. Available at: https://www.eac.gov/sites/default/files/2025-07/2024_EAVS_Report_508.pdf.

⁶¹ Malachi Barrett, "Inflated Voter List Is a Feature, Not a Bug of How Michigan Cleans Voter Rolls," *BridgeDetroit*, October 29, 2024. Available at: <https://www.bridgedetroit.com/inflated-voter-list-is-a-feature-not-a-bug-of-how-michigan-cleans-voter-rolls/>.

2. Many on the right have criticized “bloated” voter registration lists that result from the lengthy delay created by procedural protections. The bloat has fueled false narratives about voter fraud and spurred lawsuits, especially in jurisdictions where the number of registered voters approaches or exceeds the voting-age population. These claims, while largely unfounded, can nonetheless erode trust in election systems.

Solutions

Improving the accuracy and completeness of voter registration records, particularly in the context of high mobility, requires coordinated action across all levels of government. Election officials, state policymakers, and members of Congress each have distinct but complementary roles to play.

Here, we present a road map for reform: We focus first on changes that state officials can make administratively under existing law, such as strengthening interagency data sharing. We then turn to solutions that may require state legislation, including online and automatic voter registration. Finally, we outline reforms that depend on federal legislative action, such as better calibrating the quality of evidence that a voter moved with the extent of procedural protections required by the NVRA.⁶²

States should backfill full or partial SSNs from a voter’s driver’s license record.

As outlined above, federal privacy law limits the ability of election officials to collect voters’ full or even partial SSNs. In contrast, federal privacy law specifically allows motor vehicle departments to collect Social Security numbers.⁶³

One way to address the lack of SSNs without requiring changes to federal law is for states to pursue formal agreements, such as a Memorandum of Understanding (MOU), with their motor vehicle departments to backfill missing Social Security numbers into voter registration systems. Doing so would make it easier to identify in-state duplicates and merge records from both in-state and out-of-state sources.

In general, the Driver’s Privacy Protection Act (DPPA) limits the disclosure of “personal information [...] obtained [...] in connection with a motor vehicle record.”⁶⁴ However, states can leverage the “governmental-function exception” to share personal information, including SSNs, for official use in compliance with federal law.⁶⁵

⁶² For more discussion of some of these solutions, see Michael Morse, “Democracy’s Bureaucracy: The Complicated Case of Voter Registration Lists,” *Boston University Law Review*, 103: 2, 181-97, 2023. Available at: <https://ssrn.com/abstract=4396446>.

⁶³ [42 U.S.C. § 405\(c\)\(2\)\(C\)\(i\)](#). For more on the implications of federal privacy law for list maintenance, see Morse, “Democracy’s Bureaucracy,” 2, 162-81.

⁶⁴ [18 USC 2721\(a\)](#).

⁶⁵ [18 USC 2721\(b\)\(1\)](#).

Importantly, states cannot rely on ERIC to backfill SSNs in voter registration records. That’s because voter registration and driver’s license records are hashed separately—a process that converts sensitive data into unique, anonymized codes—before they are submitted to ERIC. Because the hashing process is irreversible, ERIC cannot recover or insert SSNs into voter records for election officials. As such, the model of having motor vehicle departments share SSNs with the state election office is necessary, even in ERIC member states.⁶⁶

Although SSN prevalence can be low and inconsistent, it is often above 99% in states that already work with their state department of motor vehicles to recover SSNs for voters. For example:

- **Colorado** has built a strong partnership between its motor vehicle department and state election office. By joining motor vehicle department data with voter records, **99.4%** of voter records in Colorado contain a full or partial SSN.⁶⁷
- Counties in **Missouri** follow a similar approach. Officials from Boone County report that the county has a full or partial SSN on file for **99.6%** of its voters.⁶⁸
- One western state reports having a partial SSN on file for **99.8%** of active voters, thanks to automatic voter registration and a strong data-sharing partnership with their department of motor vehicles.⁶⁹

Morse (2023) also proposed trimming the scope of federal privacy protections to enable election officials to collect partial SSNs from voters in the first place.⁷⁰ But in the absence of such reform, using the DPPA’s governmental-function exception serves as a more immediate, practical path forward that does not require changes to federal law.

States should modernize infrastructure and improve coordination between state agencies, in particular between departments of motor vehicles and election offices.

Although federal law already requires motor vehicle agencies to offer voter registration services, the effectiveness of that requirement hinges on the strength of coordination between state agencies.

Modernizing system infrastructure is a key part of the solution, but it is also a significant undertaking. As the American Association of Motor Vehicle

⁶⁶ One interesting model was seen in Georgia, where the state’s ERIC-authorizing legislation specifically required the motor vehicle department to share required data (including SSNs) with the Secretary of State, who then shares it with ERIC. [Georgia Code § 21-2-225](#).

⁶⁷ Judd Choate, Colorado State Elections Director, email interview by author, June 2025.

⁶⁸ Brianna Lennon, Boone County Clerk, MO, email interview by author, July 2025.

⁶⁹ Email interview by author with state election director from western state who wished to remain anonymous, August 2025.

⁷⁰ Michael Morse, “Democracy’s Bureaucracy: The Complicated Case of Voter Registration Lists,” *Boston University Law Review*, 103: 2, 181-84, 2023. Available at: <https://ssrn.com/abstract=4396446>.

Administrators cautions: “The journey into modernizing legacy systems takes significant time, money, and resources, and failure or project closure without completion is at an all-time high.”⁷¹ This reality underscores the need for careful planning, sustainable funding, and stakeholder buy-in before modernization efforts begin.

Technology upgrades must be paired with strong interagency communication, which can also improve the quality of data sharing in the absence of technology upgrades. Agencies should establish regular touchpoints between IT staff and program administrators, create shared training for employees who handle voter registration transactions, and adopt clear, documented data protocols. Joint working groups or steering committees involving both motor vehicle department and election office staff can help ensure that when one agency updates its processes or systems, the other is prepared to adapt.

System modernization requires sustained financial investment. States must adequately fund not only efforts to replace outdated systems but also to maintain and staff them.

States should adopt online and automatic voter registration.

Morse (2023) notes that many people who submit an application to register to vote are already registered but at a prior address yet to be updated by election officials.⁷² As a result, improving voter registration opportunities can reduce the burden on election officials to correct outdated addresses.

Both online voter registration (OVR) and automatic voter registration (AVR) can improve the accuracy of voter registration lists, reduce administrative costs, and make the registration process more inclusive.⁷³ One member of BPC’s task force reported that, without OVR or AVR, “list maintenance is nonstop, time intensive, and inefficient.”

OVR

Online voter registration has become the expected norm for voters in the digital age. Arizona became the first state to offer paperless registration in 2002, and today, 42 states and the District of Columbia offer voters the ability to register online.⁷⁴ When voters directly input their registration information, the likelihood of transcription errors drops significantly, eliminating problems introduced by illegible handwriting or manual data entry from paper forms. Due to a lack of OVR, one task force member shared that “our data are error-

⁷¹ American Association of Motor Vehicle Administrators, “System Modernization Best Practices,” May 2017. Available at: <https://www.aamva.org/getmedia/2c300624-1ddc-4bf1-8b99-5c71763cabaa/System-Modernization-Best-Practices.pdf>.

⁷² See Michael Morse, “Democracy’s Bureaucracy: The Complicated Case of Voter Registration Lists,” *Boston University Law Review*, 103: 2, 140 and n.75, 2023. Available at: <https://ssrn.com/abstract=4396446>.

⁷³ For a review of the relevant political science literature, see Seo-Young Silvia Kim, Marc Meredith, et al., *The Future of Voter Registration: Access, Accuracy, and Cost* (Cambridge, MA: MIT Election Data and Science Lab, 2023). Available at: <https://electionlab.mit.edu/sites/default/files/2023-10/voter-registration.pdf>.

⁷⁴ National Conference of State Legislatures, “Online Voter Registration,” updated January 30, 2025, Available at: <https://www.ncsl.org/elections-and-campaigns/online-voter-registration>.

prone as the system relies on clerical entry performed by election staff and poll workers, most often from voters' handwritten applications.”

OVR also facilitates more frequent updates to existing voter records, leading to more accurate and timely lists. In Orange County, CA, for example, online voter registration is the most common source of updates to a voter registration record.⁷⁵

AVR at departments of motor vehicles

Recent studies have highlighted the value of implementing automatic voter registration at motor vehicle agencies. AVR builds on the promise of Motor Voter by flipping the default: Rather than asking voters if they want to register, AVR presumes registration and gives individuals the option to decline. AVR not only helps register new voters but it also facilitates more regular registration updates, creating more accurate lists. That's because registration applications at the motor vehicle department not only serve as first-time applications but can trigger an update to an existing voter's record as well.

For example, after adopting AVR in 2023, Pennsylvania more than doubled the number of registration applicants processed through PennDOT.⁷⁶ Of the 341,297 approved applications, the majority (55%) were updates to an existing voter record.

Although voters are already given the option to register at the motor vehicle department under the NVRA, behavioral science research indicates that most people stick with the default option. Justin Grimmer and Jonathan Rodden (2022) found that before AVR was implemented, roughly 70% of Colorado's unregistered population declined the opportunity to register (or to update their registration) during motor vehicle transactions.⁷⁷

But after Colorado implemented a new approach to AVR—where eligible individuals were registered automatically and then given the option to decline later by mail—the state saw significantly higher registration rates: Grimmer and Rodden found that Colorado's reforms led to as much as 38 additional voter registrations per 100 unregistered motor vehicle department patrons, and only 0.6% of all individuals who were registered to vote automatically returned a mailer to decline their registration.

⁷⁵ Orange County Registrar of Voters, *2020 Voter List Maintenance Report*, appendix A, 38, 2020. Available at: <https://ocvote.gov/election-library/docs/2020%20Voter%20List%20Maintenance%20Report.pdf>.

⁷⁶ “A total of 464,179 AVR applications were submitted through PennDOT in 2024, compared to PennDOT's pre-AVR submissions of 224,464 voter registration applications in 2022 and 187,588 in 2020. A total of 154,177 new registrations were processed and approved by county election offices, and 187,120 voter record updates were processed in 2024.” Pennsylvania Department of State, *Administration of Voter Registration in Pennsylvania: 2024 Annual Report to the Pennsylvania General Assembly*, June 30, 2025, 30. Available at: https://www.pa.gov/content/dam/copapwp-pagov/en/dos/resources/voting-and-elections/reports/voter-registration/dos_voter_registration_report_2024_final.pdf.

⁷⁷ Justin Grimmer and Jonathan Rodden, *Changing the Default: The Impact of Motor-Voter Reform in Colorado*, January 2022. Available at: <https://www.sos.state.co.us/pubs/newsRoom/pressReleases/2022/CO-AVRAnalysisRoddenGrimmer.pdf>.

Grimmer and Rodden’s study makes clear that “as long as non-registration is the default option or registration is only a weak default, even a well-designed motor vehicle department process with diligent implementation by motor vehicle department personnel might allow a surprisingly large group of eligible people to pass through without registering to vote.”

By capturing both new registrations and timely address changes, AVR can improve both the accuracy and completeness of voter registration lists.

AVR at Medicaid and other public offices

While motor vehicle departments capture a large share of address updates, focusing exclusively on motor vehicle transactions will leave gaps in voter registration and list maintenance. Many low-income, young, and elderly voters are less likely to interact with motor vehicle departments but do regularly interact with public assistance agencies.⁷⁸

The Institute for Responsive Government urges expanding automatic voter registration to Medicaid offices, which already verify citizenship status and are considered voter registration agencies under the NVRA.⁷⁹ The institute’s 2024 report found that Medicaid AVR could reach 750,000 individuals in Colorado alone, and up to 85% of the unregistered population in Oregon. It is not clear how many current voters would be reached, but expanding automatic voter registration to Medicaid offices would likely increase the frequency of address updates for harder-to-reach populations.

Although this proposal is promising, it is a long way before Medicaid and other public assistance offices would be able to seamlessly register patrons to vote. One BPC task force member noted that federal law has prevented public health agencies in their state from implementing AVR. In general, federal privacy law restricts the use of applicants’ data to health care purposes, and the federal government has not granted states a waiver to use the information for voter registration.⁸⁰

Another member expressed concern that implementing AVR during public assistance transactions would be “like trying to slam a square peg into a round hole,” citing how applicants can often apply for benefits for their whole family during a single transaction. Such concerns suggest that more research and targeted pilot programs are needed to assess how these systems can be adapted to better serve the goals of voter registration.

⁷⁸ Institute for Responsive Government, “Medicaid Automatic Voter Registration Background and Overview,” February 27, 2024. Available at: <https://responsivegov.org/research/medicaid-automatic-voter-registration-background-and-overview-2/>.

⁷⁹ Ibid.

⁸⁰ Alex Burness, “Oregon Wants to Register Medicaid Recipients to Vote. Will Biden Officials Allow It?” *Bolts Magazine*, July 11, 2023. Available at: <https://boltsmag.org/automatic-voter-registration-medicaid-oregon-colorado/>.

Federal law should calibrate the quality of evidence that a voter moved with the extent of procedural protections.

The NVRA's procedural protections were designed to prevent a voter's wrongful removal from rolls, but these protections can delay necessary updates even when election officials have compelling evidence that the voter has moved.

To address this issue, Congress should revise the NVRA to authorize the development of standards for what constitutes evidence that a voter has moved. These standards should establish a hierarchy of evidence, recognizing that some signals (e.g., nonvoting or undeliverable mail) are far less reliable than others (e.g., verified data matches using SSN4, name, and date of birth). A revised NVRA could calibrate the reliability of evidence that a voter moved with the extent of procedural protections. Prioritizing high-confidence indicators would allow election officials to act more decisively when data supports it while maintaining full procedural protections when only weaker signals are present.

Reasonable people may disagree about what an ideal minimum substantive matching standard might be.⁸¹ Available evidence suggests that a well-calibrated standard would likely require that two records match on name and date of birth, plus at least one additional identifier such as an SSN4 or a prior/current address. Evidence from record linkage research (e.g., Stephen Ansolabehere and Eitan Hersh's ADGN model, which uses address, date of birth, gender, and name) demonstrates that such multifold matches can achieve accuracy rates comparable to full SSNs without the same privacy concerns.⁸²

For maximum effectiveness, these standards would need to be paired with improvements in commonly used data sources like the Postal Service's NCOA list, which currently lack key matching fields such as date of birth. To better support election officials:

- The Postal Service should be encouraged (or required) to collect birth year or full date of birth alongside address data.
- Voters should receive clear notice that submitting a change-of-address request may impact their voter registration.

A related proposal is to allow any state to opt-out of the NVRA's list maintenance obligations if it offers same-day voter registration, including its procedural protections—in effect extending the original terms of the 1993 bill to today.⁸³ This would allow an election official to immediately cancel a voter's registration when they suspect a voter has moved, but only if the affected voter

⁸¹ Any standards may also need to account for differences between a voter's residence for voting and other addresses. For example, DMVs often don't distinguish between where a person resides and where they might register their car.

⁸² Stephen Ansolabehere and Eitan D. Hersh, "ADGN: An Algorithm for Record Linkage Using Address, Date of Birth, Gender, and Name," *Statistics and Public Policy*, 4(1): 1–10, 2017. Available at: <https://doi.org/10.1080/2330443x.2017.1389620>.

⁸³ The NVRA exempts certain states with no registration requirement (North Dakota) or that had same-day voter registration on August 1, 1994, the day the law became effective (Idaho, Minnesota, New Hampshire, Wisconsin, and Wyoming).

could then immediately re-register. The alternative could lead to cleaner lists, but this change does not come without risk. For one, voters could be wrongly removed without the protections now guaranteed by the NVRA. Even with same-day registration, voters could face unexpected barriers when they try to cast a ballot, especially if they do not have the necessary documentation on hand to re-register.

Federal law should incentivize election officials to update, rather than cancel, a voter’s registration when they move.

A minimum substantive standard for list maintenance alone would still leave voter registration lists **incomplete**, because cancellation does nothing to ensure that voters are registered at their new address.

The NVRA already requires local election officials to update a voter’s address if they move within the same jurisdiction. However, this federal requirement does not extend to moves across jurisdictions within the same state, even though this type of move is far more common than moves across state lines.

Figure 3: Census Data on Types of Moves Among All U.S. Movers: 2021-2022⁸⁴

Type of move	2021	2022
Same county	58.4%	53.5%
Different county	39.3%	41.7%
– Same state	23.2%	24.3%
– Different state	16.2%	17.3%
From abroad (includes Puerto Rico & U.S. Island Areas)	2.3%	4.9%

To reimagine list maintenance as a tool to promote both voter access and electoral integrity, federal law should incentivize election officials to identify a voter’s current residence. When election officials reliably locate a voter’s new address within the same state, they should be required to update, rather than cancel, that voter’s registration. When election officials can’t locate a voter’s new address, the inference that the voter moved should be considered less reliable and lengthy procedural protections considered more appropriate.

Together, pairing a minimum substantive standard for removal with an affirmative obligation to update voters’ registrations as they move would transform list maintenance from a blunt instrument of removal into a proactive mechanism for keeping voters registered where they live. A recent study conducted in partnership with local election officials in Orange

⁸⁴ U.S. Census Bureau, “Change in Marital Status Became More Common Reason for Moving from 2021 to 2022, Housing/Neighborhood Improvement Reasons Declined,” November 1, 2023. Available at: <https://www.census.gov/library/stories/2023/09/why-people-move.html>.

County, CA, estimated that automatically updating a voter's registration after they move increased voter turnout by almost 6 percentage points.⁸⁵ By extending the NVRA's in-jurisdiction update requirement to apply statewide, Congress could reduce duplicate records, minimize confusion at the polls, and increase participation all while preserving procedural safeguards when uncertainty exists.

In the absence of federal reform, individual states could adopt an in-state update requirement independently. States could also consider more limited reforms to increase response rates to confirmation notices rather than updating voter registrations. In short, one explanation for why many voters don't respond to notices confirming their move is that the notices are sent to their address of registration—which they no longer reside at. Election officials could instead send confirmation notices to both the address of registration and the voters' most likely new address.

For example, election officials in Orange County ran a pilot program in 2010 in which they identified voters who have a new address on file with Experian, a credit agency.⁸⁶ Orange County officials sent Experian records of 1,000 voters who had no recent voting or registration activity. While the election office suspected that many of these voters had moved, officials were not notified of a new address through the NCOA list, the department of motor vehicles, another election office, or by the voter.

Experian ultimately returned a more recent address for over half of the voters. The election office then sent voters a notice at both the more recent address Experian identified and the address the election office had on file. Voters were far more likely to respond to a notice when it was sent to the address identified by Experian than when it was sent to the address previously on file with the election office. The election office could then update the address confirmed by the voter or immediately cancel their registration if the voter confirmed that they had left the county.

⁸⁵ Seo-young Silvia Kim, "Automatic Voter Reregistration as a Housewarming Gift: Quantifying Causal Effects on Turnout Using Movers," *American Political Science Review*, 117(3): 1,137–44, 2023. Available at: <https://doi.org/10.1017/S0003055422000983>. Figure 2 estimates the effect of automatic reregistration by exploiting an arbitrary cut-off date in the run-up to the 2018 general election, before which voters who filed a change-of-address with the post office had their voter registration automatically updated and after which voters did not.

⁸⁶ Orange County Registrar of Voters, *2020 Voter List Maintenance Report*, 22, 2020. Available at: <https://ocvote.gov/election-library/docs/2020%20Voter%20List%20Maintenance%20Report.pdf>.

Orange County has continued to use third-party data in every even-numbered year following the pilot program. Between 2012 and 2020, the county was able to update the records of 74,100 voters who were not otherwise able to be located through traditional methods.

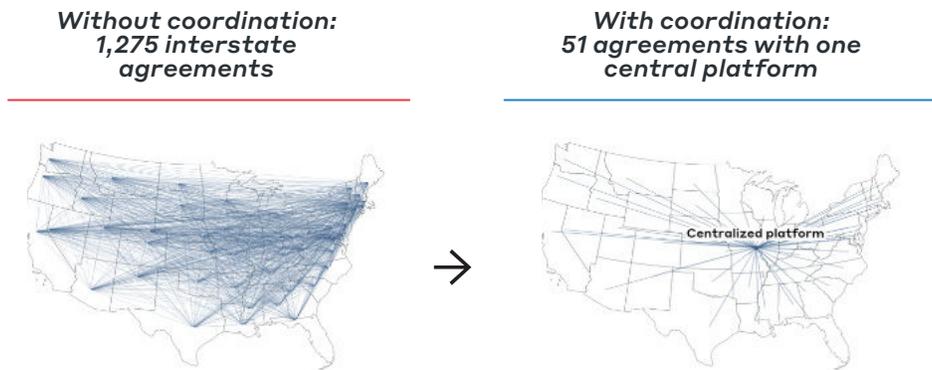
States should join, and federal law should incentivize participation in, an interstate data-sharing program that meets minimum standards for privacy.

Interstate data-sharing programs can address several of the various challenges raised earlier in the report:

Challenge	→	Solution
Voter mobility is high, and voters don't typically notify election officials when they move.	→	Interstate data sharing helps identify movers within and across states.
Election offices and motor vehicle departments often rely on outdated systems, and coordination between them is frequently lacking.	→	Interstate data-sharing programs can help standardize and improve data sharing between election offices and departments of motor vehicles.
Election officials often lack a unique, national identifier for voters, which makes matching voters across states challenging.	→	Interstate data-sharing programs can join motor vehicle and election office data to recover an SSN for most voters.

Without a unified system, election officials either operate without data from other states (making their lists less accurate) or must negotiate separate agreements with other states. To cover the whole country without a centralized program would require 1,275 separate bilateral agreements among the 51 jurisdictions (50 states, plus D.C.).⁸⁷

Figure 3: The efficiency benefits of joining an interstate data-sharing program



⁸⁷ The number of potential bilateral agreements among U.S. states is calculated using the combination formula $(n*(n-1))/2$, where n is the number of jurisdictions. With 50 states plus the District of Columbia (n = 51), the total is $(51 * 50) / 2 = 1,275$ unique agreements.

Importantly, centralization promises to improve both administrative efficiency and the quality of list maintenance. Many states lack the resources to conduct high-quality comparisons on their own, even within their own state, due to the technical complexity of large-scale record matching. Interstate data programs like ERIC can fill that gap by establishing minimum data standards, hashing sensitive information before transmission using secure, one-way cryptographic processes, and applying sophisticated matching logic.

Given the layered benefits of interstate data sharing, we encourage state election officials to join interstate data sharing programs when their state laws permit it. Where state law does not allow participation, we encourage state legislators to consider reforms that would permit and encourage or require participation.

We also recommend that Congress incentivize participation in a national or regional interstate data-sharing program that standardizes and streamlines cooperation. The value of such a system increases with broader membership: Every additional state improves the completeness of the data, strengthens the accuracy of matches, and reduces gaps created by nonparticipating jurisdictions. State-run programs like ERIC also preserve state autonomy as opposed to a federally operated program.

Congress could:

- Declare that participating in a cross-governmental election bureaucracy, with certain conditions for accuracy and transparency, would satisfy election officials' obligation under the NVRA to conduct list maintenance.⁸⁸ When Congress passed the National Voter Registration Act, it similarly declared, "A State may meet [its] requirement ... by establishing a program under which ... change-of-address information supplied by the Postal Service ... is used to identify registrants whose addresses may have changed."⁸⁹

⁸⁸ Morse, "Democracy's Bureaucracy," compiled examples showing how a few states previously encouraged the federal government to take this approach. See, e.g., Letter from Tom Schedler, Louisiana Sec'y of State, to Presidential Advisory Comm'n on Election Integrity, Aug. 9, 2017. Available at: https://trumpwhitehouse.archives.gov/sites/whitehouse.gov/files/Official%20State%20Responses_Redacted%20%289.19.2017%29.pdf ("I strongly encourage the commission to support this tool by incentivizing more states to participate in its services."); Letter from Wayne W. Williams, Colorado Sec'y of State, to Kris W. Kobach, Vice Chair, Presidential Advisory Comm'n on Election Integrity, July 14, 2017. Available at: <https://trumpwhitehouse.archives.gov/sites/whitehouse.gov/files/docs/Public-Official-Responses-Received-July-4-2017.pdf> ("I would also strongly encourage that the federal government shift resources to incentivize states' participation in ... [ERIC]."); Letter from Kenneth R. Menzel, Gen. Couns., Illinois State Bd. of Elections, to Kris W. Kobach, Vice Chair, Presidential Advisory Comm'n on Election Integrity, Sept. 19, 2017. Available at: https://trumpwhitehouse.archives.gov/sites/whitehouse.gov/files/Official%20State%20Responses_Redacted%20%289.19.2017%29.pdf ("We would recommend that ERIC membership be encouraged, or even monetarily subsidized, for all states.")

⁸⁹ [52 U.S.C. § 20507\(c\)\(1\)](#).

- Offer conditional grants to cover states' membership obligations and associated costs.²⁴ For context, ERIC—the largest existing data-sharing effort—operates on a budget of roughly \$1.7 million per year.⁹⁰ This could be a relatively small investment with significant reward.

By minimizing the need for states to negotiate and manage dozens of individual partnerships, this approach would stabilize cross-state cooperation, reduce workloads for election administrators, and promote more accurate and complete voter registration lists.

Any federal support for an interstate data-sharing program should be conditioned on that program's ability to meet **accuracy, privacy, security, and transparency standards.**

The examples below represent some potential approaches (informed in part by ERIC's decade-long experience facilitating interstate data sharing), but actual standards should be developed in close consultation with privacy experts, cybersecurity professionals, election officials, and civil society stakeholders. Standards must be structured such that they remain flexible and adaptive, given the rapid evolution of security threats and technology. Participating programs might be required to:

- Accuracy
 - Enforce a minimum requirement for the types of data that states share for list maintenance, including data from both election offices and departments of motor vehicles that together includes full name, date of birth, address, SSN/SSN4, and driver's license or ID number.
 - Develop and adopt a standardized data format for records across participating states, including uniform field definitions for names, addresses, dates, and dates of recent activity.
 - Adopt a minimum match standard, such as one that includes a combination of full name, date of birth, address, SSN or SSN4, and driver's license or ID number.
 - Document and standardize matching methodologies to ensure consistency and allow for auditing.
- Privacy and Security
 - Implement strong access controls, ensuring only authorized officials have access to sensitive data, with clear audit logs of data access and use.
 - Use encryption and secure transfer protocols for all data transmissions.
 - Follow federal cybersecurity guidelines, such as those outlined by the Cybersecurity and Infrastructure Security Agency (CISA) and the National Institute of Standards and Technology (NIST).

⁹⁰ ERIC Inc., "FAQ," accessed August 18, 2025. Available at: <https://ericstates.org/faq/>.

- Develop formal incident response plans to address potential data breaches, including notification requirements and mitigation procedures.
 - Conduct regular security audits and vulnerability assessments to ensure ongoing compliance with best practices.
 - Restrict use of data strictly to voter list maintenance.
- Transparency
 - Publicly disclose how data is used and matched.
 - Publish summary statistics on match results and voter outreach actions by state.

Any federal legislation should also address the growing conflict Morse (2023) identified between federal election law and federal privacy law.⁹¹ In short, for all the benefits of motor vehicle records for improving voter list maintenance, they are subject to extensive privacy protections. As a result, election officials in the Electronic Registration Information Center have found themselves caught between the NVRA’s transparency mandate for list maintenance⁹² and the DPPA’s limits on disclosure of “personal information ... obtained ... in connection with a motor vehicle record.” One possibility is to amend the Driver’s Privacy Protection Act to allow the disclosure of individual-level list maintenance activity, even if it is based on motor vehicle records, but with sensitive data fields redacted. Regardless, election officials would benefit from clear guidance on how to navigate obligations for both transparency and privacy.

VERIFYING VOTER CITIZENSHIP

Keeping up with voter mobility and verifying voter citizenship share certain features but also differ in key respects. Like residency, citizenship information is often spread across a patchwork of government agencies, making it a coordination challenge for election officials to maintain accurate records. Yet, whereas mobility is frequent and a well-documented challenge for election officials, naturalization occurs less often and only in one direction. Furthermore, there is no evidence that the current citizenship verification

⁹¹ Michael Morse, “Democracy’s Bureaucracy: The Complicated Case of Voter Registration Lists,” *Boston University Law Review*, 103: 2, 181-84, 2023. Available at: <https://ssrn.com/abstract=4396446>.

⁹² “Each State shall maintain for at least 2 years and shall make available for public inspection and, where available, photocopying at a reasonable cost, all records concerning the implementation of programs and activities conducted for the purpose of ensuring the accuracy and currency of official lists of eligible voters.” [52 U.S.C. § 20507\(i\)\(1\)](#).

framework, which relies on voter attestation under penalty of perjury,⁹³ is failing to keep noncitizens from voting at scale.⁹⁴

Both state and federal law already prohibit noncitizens from voting in federal elections.⁹⁵ In the rare cases where it does happen, it is routinely identified, investigated, and prosecuted by the relevant authorities.⁹⁶ Despite its low prevalence, questions around the potential for noncitizen voting continue to shape both policy debates and public concern.

Recent policy proposals tend to take one of two approaches:

1. **Front-end verification**, where the burden is on the voter to prove their citizenship by providing documentary proof to a state or local official.

This approach is better understood as a registration prerequisite rather than list maintenance, and courts have found it violates the NVRA when applied to federal elections.⁹⁷

2. **Back-end verification**, where election or other government officials, such as those at the department of motor vehicles, consult existing government data to verify a voter's citizenship status. This approach aligns more closely with traditional list maintenance practices.

Both models face trade-offs. Front-end verification risks burdening eligible voters who lack ready access to proof of citizenship, while back-end verification hinges on the accuracy, completeness, and interoperability of government databases. Between the two approaches, we encourage policymakers to prioritize back-end verification over front-end verification because it places the responsibility on government officials rather than voters to prove citizenship. However, it is important to note that neither front-end nor back-end verification needs to be adopted; states could continue relying on attestation of citizenship, which successfully prevents noncitizen registration or voting at scale.

This section focuses on what we don't yet know about citizenship verification. Despite its salience, the process of verifying voter citizenship is understudied. Here, we lay out the practical and legal challenges that make comprehensive

⁹³ "Each State shall accept and use the mail voter registration application form." [52 U.S.C. § 20505\(a\)\(1\)](#). "The mail voter registration form ... shall include a statement that—(A) specifies each eligibility requirement (including citizenship); (B) contains an attestation that the applicant meets each such requirement; and (C) requires the signature of the applicant, under penalty of perjury." [52 U.S.C. § 20508\(b\)\(2\)\(A\)–\(C\)](#).

⁹⁴ Miles Parks, "Despite Grand Claims, a New Report Shows Noncitizen Voting Hasn't Materialized," NPR, July 30, 2025. Available at: <https://www.npr.org/2025/07/30/nx-s1-5462836/noncitizen-voting-trump-ceir-review>.

⁹⁵ *Illegal Immigration Reform and Immigrant Responsibility Act of 1996*, Pub. L. No. 104-208, 110 Stat. 3008 (1996). Available at: <https://www.govinfo.gov/content/pkg/PLAW-104publ208/pdf/PLAW-104publ208.pdf>. For more on the federal prohibition on noncitizen voting, see Stephen E. Mortellaro, "The Unconstitutionality of the Federal Ban on Noncitizen Voting and Congressionally-Imposed Voter Qualifications," *Loyola Law Review* 63: 447–94, 2017. Available at: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3039812.

⁹⁶ U.S. Immigration and Customs Enforcement, "19 Foreign Nationals Indicted for Illegally Voting in 2016 Elections," news release, August 27, 2018. Available at: <https://www.ice.gov/news/releases/19-foreign-nationals-indicted-illegally-voting-2016-elections>.

⁹⁷ For example, state documentary proof of citizenship laws were struck down for violating various aspects of the NVRA in *Arizona v. Inter Tribal Council of Ariz., Inc.*, 570 U.S. 1 (2013); *Fish v. Schwab*, 957 F.3d 1105 (10th Cir. 2020), and *Mi Familia Vota v. Fontes*, 129 F.4th 691 (9th Cir. 2025).

citizenship verification difficult to achieve in the present moment in hopes of preventing premature policy reform while spurring additional research into long-term solutions.

Challenges

Many eligible voters don't have documentary proof of citizenship readily available.

Recent legislative trends reflect growing interest in front-end verification. Between January and July of 2025, 27 states⁹⁸ and Congress⁹⁹ considered legislation that would require voters to provide documentary proof of citizenship to register or vote. So far, three states have enacted such laws.¹⁰⁰

According to USCIS, the most common documents establishing citizenship include:

- a birth certificate, if born in the United States or registered abroad by U.S. citizen parents;
- a U.S. passport;
- a Certificate of Citizenship, issued to someone who derived or acquired citizenship through a parent;
- or a Naturalization Certificate, issued to someone who became a citizen after age 18.¹⁰¹

Although at least one of these documents are in theory available to most citizens, not all voters have them readily available. According to recent studies:

- **9%** of eligible voters do not have, or do not have easy access to, documentary proof of citizenship.¹⁰²
- **11%** of registered voters do not have access to their birth certificate.¹⁰³ One task force member who implemented a documentary proof-of-citizenship requirement further noted that “the process to get a replacement birth certificate is cumbersome, varies by state, and can take several weeks to process.”

⁹⁸ Voting Rights Lab, “Comprehensive Bill Search,” accessed August 10, 2025. Available at: <https://tracker.votingrightslab.org/pending/search/?number=4880348600170840>. Filtered by Years = 2025 and Issues = Proof of Citizenship.

⁹⁹ SAVE Act, H.R. 22, 119th Congress (2025). Available at: <https://www.congress.gov/bill/119th-congress/house-bill/22>.

¹⁰⁰ Voting Rights Lab, “Comprehensive Bill Search,” accessed August 10, 2025. Available at: <https://tracker.votingrightslab.org/pending/search/?number=7021922466618314>. Filtered by Years = 2025, Issues = Proof of Citizenship, Latest Stage = Enacted.

¹⁰¹ U.S. Department of State, “I Am a U.S. Citizen. How Do I Get Proof of My U.S. Citizenship?” 2013. Available at: <https://www.uscis.gov/sites/default/files/document/guides/A4en.pdf>.

¹⁰² Jillian Andres Rothschild, Samuel B. Novey, and Michael J. Hanmer, *Who Lacks Documentary Proof of Citizenship?* Center for Democracy and Civic Engagement, University of Maryland, March 2025. Available at: <https://cdce.umd.edu/sites/cdce.umd.edu/files/Who%20Lacks%20Documentary%20Proof%20of%20Citizenship>.

¹⁰³ Charles Stewart, “So Much to Say About Pres. Trump’s Election EO, But Let’s Start with Passport Possession,” *Playing with Election Data* (blog), March 26, 2025. Available at: <https://playingwiththeelectiondata.substack.com/p/so-much-to-say-about-pres-trumps>.

- 52% of registered voters do not have an unexpired passport with their current legal name.¹⁰⁴

Misconceptions about Real IDs

Real IDs, which are often assumed to be a reliable proxy for citizenship, do not definitively establish citizenship. Real ID-compliant identification confirms identity and lawful presence but not citizenship. According to the Department of Homeland Security (DHS), the only state-issued IDs that explicitly indicate citizenship are *enhanced* driver’s licenses issued by Michigan, Minnesota, New York, Vermont, and Washington.¹⁰⁵ Ohio also began requiring that a “noncitizen” designation be added to state identification cards in 2023.¹⁰⁶

Challenges verifying the authenticity of documentary proof of citizenship

Even if voters were required to provide documentary proof of citizenship, verifying the authenticity of those documents is an inherently complex task, one that is not currently aligned with the core functions of election offices or motor vehicle departments.

USCIS identifies birth certificates as the primary proof of citizenship for most Americans.¹⁰⁷ Yet the United States has no national birth registry, and states, counties, and municipalities are each responsible for issuing their own versions of birth certificates. As a result, an estimated 14,000 different types of birth certificate documents are currently in circulation.¹⁰⁸

Additionally, birth certificates often lack information that matches a person’s current identity. For instance, someone who has changed their name through marriage or court order may need to present a third document (such as a marriage certificate) to join their proof of citizenship (e.g., birth certificate) with their proof of identity (e.g., driver’s license). A 2023 report by the Pew Research Center found that 79% of married women changed their name upon marriage, and an additional 5% hyphenated their names.¹⁰⁹

¹⁰⁴ Ibid.

¹⁰⁵ U.S. Department of Homeland Security, “Enhanced Drivers Licenses: What Are They? | Homeland Security,” last updated April 27, 2023. Available at: <https://www.dhs.gov/enhanced-drivers-licenses-what-are-they>.

¹⁰⁶ [Ohio Revised Code § 4507.13](#).

¹⁰⁷ U.S. Department of State, “I Am a U.S. Citizen. How Do I Get Proof of My U.S. Citizenship?” 2013. Available at: <https://www.uscis.gov/sites/default/files/document/guides/A4en.pdf>.

¹⁰⁸ American Bar Association, “Birth Certificates,” November 20, 2018. Available at: https://www.americanbar.org/groups/public_education/publications/teaching-legal-docs/birth-certificates/.

¹⁰⁹ Luona Lin, “About 8 in 10 women in opposite-sex marriages say they took their husband’s last name.” Pew Research Center, April 24, 2025. Available at: <https://www.pewresearch.org/short-reads/2023/09/07/about-eight-in-ten-women-in-opposite-sex-marriages-say-they-took-their-husbands-last-name/>.

Case Study: Kansas

Kansas offers a case study for why states should be wary of front-end verification efforts.

In 2011, Kansas adopted the Secure and Fair Elections (SAFE) Act, which included a requirement that voters provide documentary proof of citizenship when they register to vote.¹¹⁰ The law went into effect in 2013 and was the subject of multiple consolidated lawsuits. Ultimately, a federal court determined the following:

- Between 1999 and 2013, when the Kansas law went into effect, there were 39 confirmed cases of noncitizens who had registered to vote, or about .002% of all registered voters as of 2013.¹¹¹
- Between 2013 and 2015, the Kansas law prevented about 31,000 applicants from registering to vote, or about 12% of all applicants, during this time period.¹¹²
- Specifically as to those individuals whose applications were suspended:
 - more than 99% were citizens.¹¹³
 - the number of noncitizens was “statistically indistinguishable from zero.”¹¹⁴

Given these facts, a federal court struck down the law as violating both the NVRA’s Motor Voter provisions as well as the Constitution’s Equal Protection Clause.¹¹⁵

While a state legislator, Kansas Secretary of State Scott Schwab supported the idea of documentary proof of citizenship. But after seeing how the law worked out in practice, he has begun to urge other states against it: “Kansas did that 10 years ago,” Schwab told the Associated Press. “It didn’t work out so well.”¹¹⁶

Back-end verification at the state level often relies on records scattered across multiple agencies, many of which lack the technology needed for accurate, timely, and interoperable data sharing.

Citizenship is a dynamic legal status. Although a particular government transaction may record an individual as lacking citizenship, a noncitizen can become a citizen after completing the naturalization process. However, naturalizations often fail to cascade quickly, or at all, across disparate administrative systems. As a result, citizenship audits routinely flag

¹¹⁰ [Kan. Admin. Regs. § 7-23-14.](#)

¹¹¹ *Fish v. Schwab*, 957 F.3d 1105, 1115 (10th Cir. 2020).

¹¹² *Ibid.*

¹¹³ *Ibid.*

¹¹⁴ *Ibid.*

¹¹⁵ For the NVRA analysis, see *ibid.* at 1,136-44, and for the equal protection analysis see *ibid.* at 1121-36.

¹¹⁶ John Hanna, “When a Kansas law forced voters to prove citizenship, a fiasco followed.” Associated Press, December 29, 2024. Available at: <https://apnews.com/article/kansas-noncitizen-voting-proof-of-citizenship-50d56a0b8d1f0fde15480aab3db67f4f>.

individuals who have in fact been naturalized but whose citizenship status has not yet been reflected in administrative databases.

Motor vehicle departments are primarily tasked with confirming an individual's identity, not their legal status.¹¹⁷ Even when motor vehicle departments do collect information related to immigration status, they often distinguish only between undocumented individuals and those with an authorized presence, a broader category that includes lawful permanent residents, visa holders, and others ineligible to vote. Furthermore, as discussed earlier in the report, many operate on legacy technology platforms, limiting their ability to support complex data sharing or to preserve document-level metadata over time.

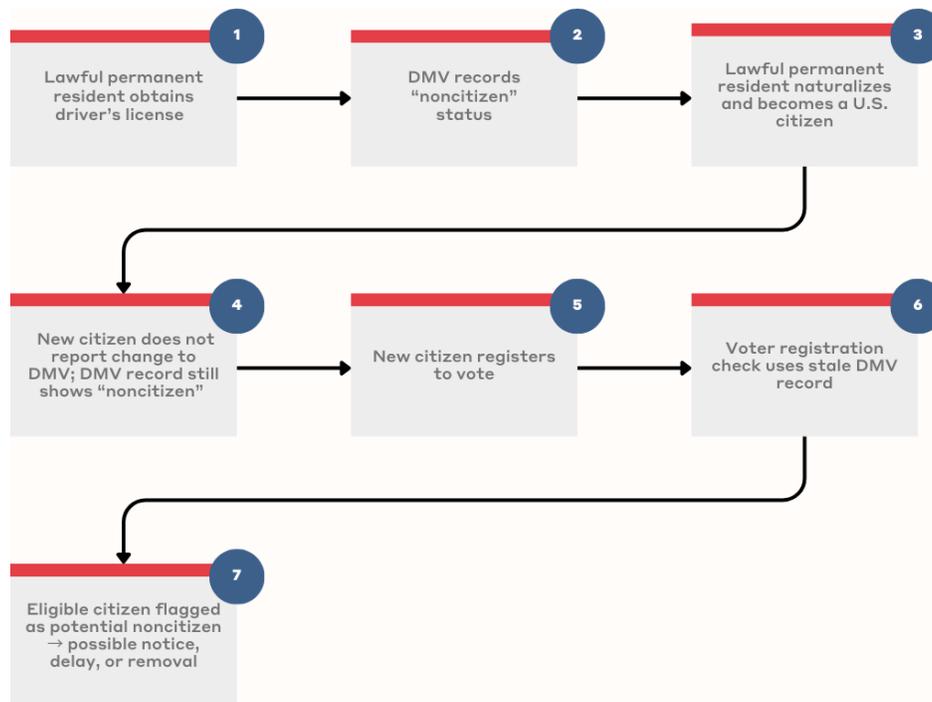
Ohio Secretary of State Frank LaRose, for instance, flagged 521 cases of potential noncitizen voting between 2019 and September 2023.¹¹⁸ But an *Ohio Capital Journal* review found just one case in which a noncitizen was ultimately charged with voter fraud.¹¹⁹ The review noted that this was due to a combination of accidental registration and a lag in how the department of motor vehicles updates an individual's citizenship status after naturalization. Absent a mechanism to correct for such lags, otherwise eligible citizens may face unnecessary scrutiny, administrative delays, or even cancellation of their registration based on outdated information.

¹¹⁷ Arizona Department of Transportation, "Report on Audit of MVD's Authorized Presence Policy and Data for Voter Registration Purposes," January 31, 2025. Available at: <https://www.democracymonitor.com/wp-content/uploads/2025/02/hobbs-mvd-audit.pdf>. The report states: "To comply with federal and state requirements for MVD transactions, MVD verifies only that the customer's presence is authorized in the United States, which may include citizenship as well as other legal immigration statuses."

¹¹⁸ Nick Evans, Ohio Sec. Of State LaRose Flagged More Than 520 Cases of Noncitizen Voter Fraud. Only One Was Legit," *Ohio Capital Journal*, September 27, 2023. Available at: <https://ohiocapitaljournal.com/2023/09/27/ohio-sec-of-state-larose-flagged-more-than-520-cases-of-noncitizen-voter-fraud-only-one-was-legit/>.

¹¹⁹ Ibid.

Figure 4: Example of How Outdated Citizenship Records Can Affect Voter Registration



A similar risk arises when election officials rely on jury summons responses to assess citizenship status. As with outdated motor vehicle data, stale jury records can misidentify newly naturalized citizens as ineligible. Members of the task force report that these mismatches are a common occurrence when jury data is used for list maintenance. Moreover, as the National Conference of State Legislatures notes, “It is not uncommon for someone wishing to avoid jury duty to mark the form incorrectly, so using this information alone is likely not enough proof to remove a person from the rolls.”¹²⁰

Case Study: Arizona

In Arizona, residents are required to provide documentary proof of citizenship to vote in state and local elections. For most Arizona voters, this requirement is satisfied as part of a back-end process triggered during a driver’s license or state ID transaction. Arizona began requiring proof of authorized presence to receive a new license or ID on October 1, 1996.¹²¹ As a result, state law allows an Arizona license or ID issued after October 1, 1996, to serve as documentary proof of citizenship.¹²² When a county enters a voter’s registration application

¹²⁰ National Conference of State Legislatures, “Legislative Approaches to Ensuring Only Citizens Vote.” n.d., accessed August 14, 2025. Available at: <https://www.ncsl.org/elections-and-campaigns/legislative-approaches-to-ensuring-only-citizens-vote>.

¹²¹ [Ariz. Rev. Stat. § 16-166\(F\)\(1\)](#).

¹²² [Ariz. Rev. Stat. §16-121.01\(C\)](#).

into the statewide voter registration database, the database queries driver's license records for information about a voter's citizenship status.¹²³

Although Arizona has one of the oldest documentary proof-of-citizenship requirements in the country, the state continues to struggle with its implementation. A recent audit commissioned by Gov. Katie Hobbs documented the granular and highly technical nature of these difficulties.¹²⁴

Ahead of the 2024 presidential election, Arizona officials identified roughly 200,000 Arizonans who had been issued licenses before 1996 that were incorrectly coded as having provided proof of citizenship. The cause was technical misalignment between the Department of Transportation's Motor Vehicle Division (MVD) and the state election office, and how Arizona's voter registration system handled the updates it received from the MVD. Votebeat's Jen Fifield explains:

"[T]he secretary's system was set up to gather just the issuance date of the driver's license as an indicator of citizenship verification. That issuance date in the records was often incorrect—if the voter had renewed or gotten a duplicate license after 1996, it would show the most recent issuance date. That signaled to the recorders that the voter had provided citizenship proof, even if they hadn't.

"The voter registration system was supposed to provide further information on each license, such as each subsequent issuance date, but because of an error in the system, it did not."¹²⁵

Arizona's experience demonstrates how a seemingly minor incongruence in data standards (how issuance date is stored and shared), a lack of communication, and insufficient system interoperability between the state's MVD and election office led to downstream consequences for voter eligibility and registration accuracy.

The obsolescence of Arizona's 1980s-era legacy MVD system exacerbated these issues: It lacked modern controls, was difficult to support, and could not easily integrate with the voter registration database.¹²⁶

¹²³ Arizona Motor Vehicle Division, in consultation with Robyn Stallworth-Pouquette, former Yuma County recorder, and Patty Hansen, former Coconino County recorder, *Report on Audit of MVD's Authorized Presence Policy and Data for Voter Registration Purposes*, prepared for the Office of the Arizona Governor Katie Hobbs, January 31, 2025. Available at: <https://s3.documentcloud.org/documents/25510724/hobbs-mvd-audit.pdf>.

¹²⁴ Ibid.

¹²⁵ Jen Fifield, "Audit shows extent of Arizona's problems with tracking voters' citizenship," *Votebeat*, January 31, 2025. Available at: <https://www.votebeat.org/arizona/2025/01/31/arizona-audit-reveals-problem-tracking-voter-citizenship/>.

¹²⁶ Arizona Motor Vehicle Division, in consultation with Robyn Stallworth-Pouquette, former Yuma County recorder, and Patty Hansen, former Coconino County recorder, *Report on Audit of MVD's Authorized Presence Policy and Data for Voter Registration Purposes*, prepared for the Office of the Arizona Governor Katie Hobbs, January 31, 2025. Available at: <https://s3.documentcloud.org/documents/25510724/hobbs-mvd-audit.pdf>.

Arizona has since modernized its system, transitioning to a cloud-based platform called MAX built on a relational database with contemporary technical support and modular architecture. The audit found that “as the statewide voter registration system and MVD technology advanced, MVD and election officials have identified and resolved” the noted discrepancies.¹²⁷

While promising, recent federal efforts to make the USCIS SAVE system a centralized source of citizenship information for election officials are nascent and untested.

The Systematic Alien Verification for Entitlements (SAVE) program, operated by the U.S. Citizenship and Immigration Services, is an online service that “provides point in time immigration status and naturalized/acquired U.S. citizenship information to federal, state, local, territorial, and tribal agencies.”¹²⁸ It was created in 1987 to help agencies comply with the Immigration Reform and Control Act’s prohibition on granting certain public benefits to unauthorized immigrants.¹²⁹

SAVE is not a database. Rather, it queries other federal databases—including those maintained by the Departments of Homeland Security and Justice—for information about an individual’s status.

Until this year, election administrators were largely unable to use SAVE. Historically, it only queried information on individuals with formal immigration statuses (such as lawful permanent residents or visa holders). User agencies were also required to provide an applicant’s unique immigration identifier to query SAVE; this is data that election offices rarely, if ever, collect or maintain.¹³⁰

USCIS has made the following changes to SAVE this year to increase its usability by election offices:

- Removing usage fees for queries and permitting user agencies to submit queries for multiple individuals at once in bulk.

¹²⁷ Ibid.

¹²⁸ U.S. Citizenship and Immigration Services, “SAVE,” n.d., accessed August 18, 2025. Available at: <https://www.uscis.gov/save>.

¹²⁹ American Immigration Council, “The Systematic Alien Verification for Entitlements (SAVE) Program: A Fact Sheet,” August 3, 2021. Available at: <https://www.americanimmigrationcouncil.org/report/systematic-alien-verification-entitlements-save-program-fact-sheet/>.

¹³⁰ Virginia offers a case in point. As required under § 24.2-404(E) of the Virginia Code, the Department of Elections (ELECT) entered into an agreement with USCIS to use the SAVE program as part of its voter list maintenance procedures. But despite this agreement and associated training, the system proved unusable. As ELECT concluded in 2022, “It was ultimately determined that SAVE was unusable for list maintenance purposes due to limitations within the system,” citing the difficulty posted by the unique identifier. Virginia Department of Elections, “Annual List Maintenance Report,” 2021. Available at: https://www.elections.virginia.gov/media/formswarehouse/maintenance-reports/2022-List-Maintenance-Report_final.pdf.

- Partnering with the Social Security Administration (SSA) to facilitate verification of U.S.-born citizens in addition to those with formal immigration status.¹³¹
- Allowing queries with 9-digit SSNs rather than just immigration identifiers. At the time of writing, USCIS is working toward expanding this feature to also allow agencies to submit requests for individuals with just an SSN4.¹³²

With these changes, SAVE has the potential to be of significant value to election officials, serving as one source of back-end citizenship verification that doesn't require action from voters. This is similar to how officials have used database checks for more than a decade to verify U.S. citizenship for Medicaid applicants. Under the Children's Health Insurance Program Reauthorization Act (CHIPRA) of 2009, states were permitted to replace document-based proof of citizenship with SSA database verification. This change led to match rates of 93%–99% within a year and saved millions of dollars in administrative costs.¹³³

However, applying SAVE to list maintenance is still largely untested. Some of SAVE's recent changes are modest adjustments within its original scope—such as removing usage fees and allowing bulk queries—while others, like the new partnership with SSA, represent a significant expansion of its role.

We recommend that policymakers consider the following limitations, elaborated in detail below, before deploying SAVE verification for all voters:

1. USCIS guidance explicitly instructs agencies that SAVE cannot definitively determine if an individual is a noncitizen.
2. Election officials often can't take advantage of SAVE's built-in safeguards to resolve ambiguities about an individual's citizenship.
3. The effort to make SAVE more accessible to election administrators by accepting SSN4 as a unique identifier may make matches less accurate, depending on how the change is implemented.
4. Data sharing between SSA and SAVE raises unresolved legal and privacy concerns.

USCIS guidance explicitly instructs agencies not to treat noncitizen results as definitive

The SAVE system is not a comprehensive tool for verifying U.S. citizenship across the electorate. According to the USCIS Voter Registration and Voter List Maintenance Fact Sheet, "User agencies must take additional steps when

¹³¹ U.S. Citizenship and Immigration Services, "Voter Registration and Voter List Maintenance Fact Sheet," 2025, accessed August 18, 2025. Available at: <https://www.uscis.gov/save/current-user-agencies/guidance/voter-registration-and-voter-list-maintenance-fact-sheet>. According to the fact sheet: "SAVE can verify U.S.-born citizens for voter verification agencies. When an SSN is provided, SAVE is able in many cases to verify U.S.-born U.S. citizens for voter verification purposes, through information accessed through the SSA."

¹³² David Jennings, Presentation on USCIS SAVE System at National Association of State Election Directors (NASED) conference, Oklahoma City, OK, July 23, 2025.

¹³³ Institute for Responsive Government, "An Updated Federal Database to Verify Voter Citizenship," May 23, 2025. Available at: <https://responsivegov.org/research/uscis-save-database-overhaul/>.

required for any SAVE response other than ‘United States Citizen.’”¹³⁴ Those additional steps include submitting documentary proof of citizenship for manual review, as elaborated in the next section.

USCIS further states that it does not have information on all citizens: “SAVE verifies naturalized and acquired U.S. citizenship only if found in federal government records available to SAVE.”¹³⁵ There are several reasons why an eligible voter may not exist in the federal records maintained by SSA or DHS, or have outdated information if they do.

- USCIS may not be able to confirm citizenship “if an individual with acquired citizenship status (for example, a foreign-born child of U.S. citizens) has not applied for a Certificate of Citizenship.”¹³⁶
- SSA may not have citizenship information for those who acquired a Social Security number before 1978.

Nearly every legal resident of the United States has an SSN, but the Social Security Administration only began systematically collecting evidence of citizenship or immigration status in 1978.¹³⁷ It is unclear what the SSA’s process is for individuals who obtained a number before 1978.

- SSA likely has outdated citizenship information for many naturalized citizens.

SSA records are a snapshot in time for noncitizens and those with acquired citizenship status. Upon naturalization, a new citizen can either permit USCIS to transmit their information to SSA directly or do so manually.¹³⁸

SSA has acknowledged that “[t]here is no obligation for an individual to report to SSA a change in his or her immigration status until he or she files for a Social Security benefit.”¹³⁹ As a result, SSA has outdated citizenship information for many individuals who obtained a number before naturalization.¹⁴⁰

¹³⁴ U.S. Citizenship and Immigration Services, “Voter Registration and Voter List Maintenance Fact Sheet,” 2025, accessed August 18, 2025. Available at: <https://www.uscis.gov/save/current-user-agencies/guidance/voter-registration-and-voter-list-maintenance-fact-sheet>.

¹³⁵ Ibid.

¹³⁶ Ibid.

¹³⁷ Carolyn Puckett, “The Story of the Social Security Number,” *Social Security Bulletin*, 69(2): 55–74, 2009. Available at: <https://www.ssa.gov/policy/docs/ssb/v69n2/v69n2p55.html>.

¹³⁸ U.S. Citizenship and Immigration Services, “Important Information for New Citizens,” April 2024. Available at: <https://www.uscis.gov/sites/default/files/document/flyers/M-767.pdf>.

¹³⁹ Social Security Administration, Office of the General Counsel, Office of General Law, letter to Jon Sherman, Fair Elections Center, July 13, 2023. Available at: <https://fairelectionscenter.org/wp-content/uploads/2025/07/SSA-Touhy-Decision-letter.July-13-2023-signed.pdf>.

¹⁴⁰ Social Security Administration, Office of the Inspector General, Accuracy of the Social Security Administration’s Numident, Audit Report No. A-08-12-11280, October 2012. Available at: <https://oig-files.ssa.gov/audits/full/A-08-12-11280.pdf>. The audit states, “In 2006, we reviewed SSA’s Numident and determined that the information it contained was generally accurate. However, we estimated that discrepancies in approximately 4.1 percent of the Numident records could have resulted in incorrect feedback when submitted through E-Verify. For example, our review showed that the Numident records contained discrepancies in numberholders’ names, dates of birth, citizenship status, and/or death indications”

Thus, SSA is likely best suited to confirm citizenship for natural-born citizens (and in particular, natural-born citizens who acquired an SSN after 1978). That said, this particular issue may not prove to be a limitation when it comes to the SAVE system.

According to a spokesperson for USCIS, when a SAVE query is submitted with a Social Security number and SSA returns a “noncitizen” result, SAVE will request the individual’s DHS-issued immigration identifier (such as an A-Number) from SSA and prioritize DHS information on their status.¹⁴¹ In this way, SAVE could effectively retrieve an individual’s DHS identifier using their SSN and then trigger SAVE’s traditional verification protocols to determine if the individual had naturalized.

As long as SSA is able to reliably return a DHS identifier, SAVE should, in theory, be able to reliably return information about naturalized citizens’ status (the same spokesperson said that naturalization events are reflected in SAVE in “near real time”). That said, joining SSA and USCIS data is new and to date untested, and we recommend caution until additional information becomes available.

We depict how this SAVE and SSA process might work for a sample transaction in the following section.

Election officials often can’t take advantage of SAVE’s tiered verification processes

To prevent the wrongful denial of benefits (or, in this case, voting rights) based on an erroneous response, the SAVE system uses a tiered verification process.¹⁴² This system is designed to flag uncertain results for additional USCIS review when automatic verification fails, typically due to outdated records, missing identifiers, or conflicting data. For example, SAVE responses can reflect outdated submissions from unrelated agencies based on prior unrelated verification attempts.

¹⁴¹ David Jennings, Presentation on USCIS SAVE System at National Association of State Election Directors (NASED) conference, Oklahoma City, OK, July 23, 2025.

¹⁴² U.S. Citizenship and Immigration Services, “Verification Process,” last updated May 22, 2025. Available at: <https://www.uscis.gov/save/about-save/save-verification-process>.

When SAVE cannot automatically verify a voter’s citizenship status, it requires the requesting agency to initiate additional verification by supplying more information or by uploading a copy of the applicant’s immigration document.¹⁴³ In some cases, this additional documentation prompts an update to the individual’s status within SAVE itself.

There are multiple points in the process where election offices are unable to fully take advantage of the secondary verification process:

1. No record is found with SSA.

- a. When an election office queries SAVE with only a voter’s name, date of birth, and SSN (and no DHS identifier), SAVE will query the SSA first.
- b. According to USCIS, “If a voter verification case created with only an SSN returns a response of ‘No Record Found with SSA – Resubmit with Additional Information,’ **user agencies will be unable to request additional verification.**”
- c. Instead, election officials are prompted to verify the information they submitted was correct and then direct the voter to contact SSA to update their records.
- d. USCIS also gives user agencies the option to submit a new case with a DHS enumerator (such as an A-Number), but this is information that election officials rarely have on file.

2. SAVE recovers a DHS identifier from SSA but manual review is still needed.

- a. In cases where SAVE retrieves a DHS identifier from an SSA record, it can proceed with a status check from the other databases that SAVE queries.
- b. Even then, roughly 20% of these cases still return a nondefinitive result,¹⁴⁴ requiring the election office to submit the case for additional verification.¹⁴⁵
 - i. Election officials are given the option to submit additional information or immigration documents when submitting the case for additional verification, but it’s unlikely that they will have either.

¹⁴³ Ibid.

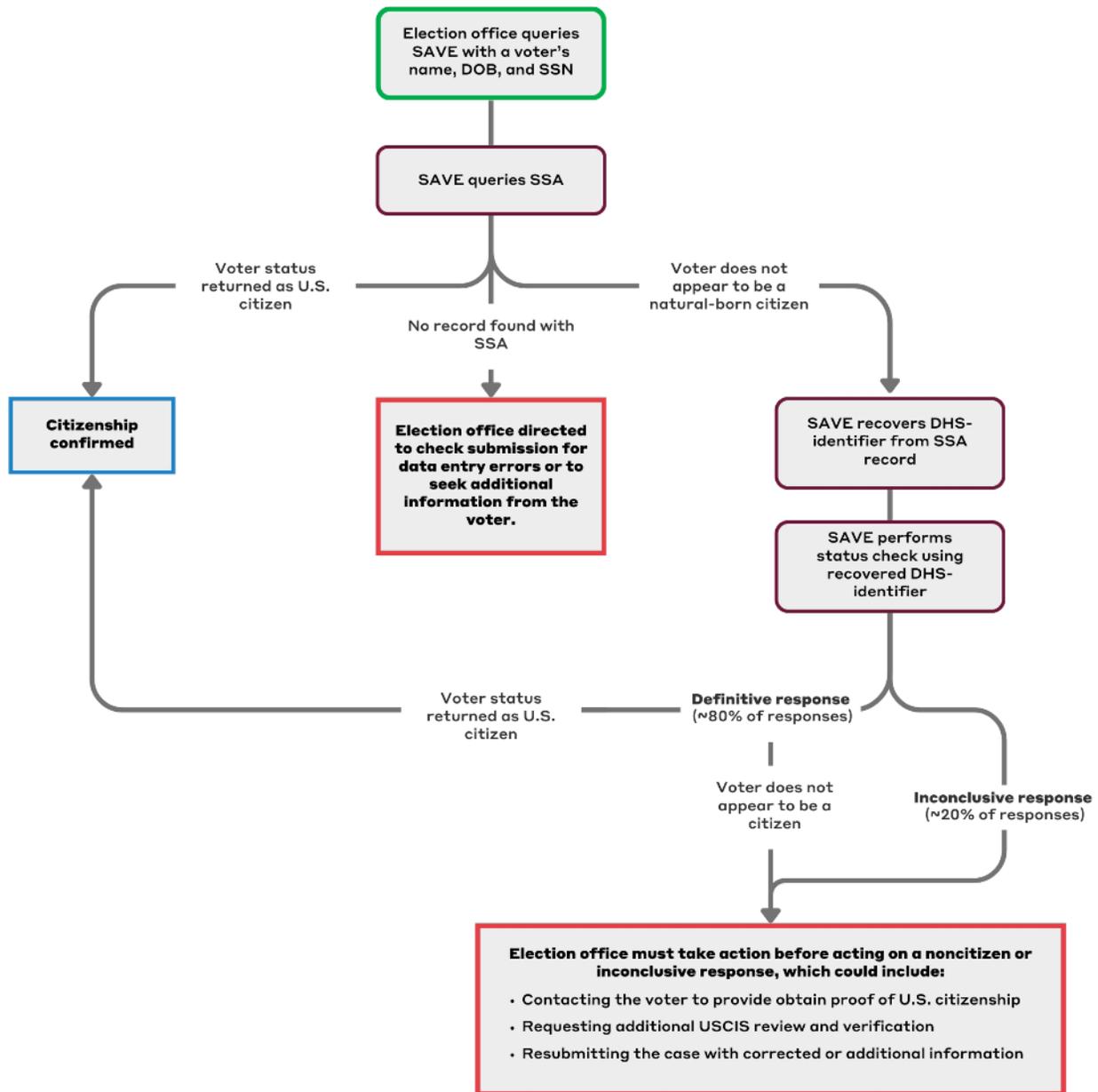
¹⁴⁴ U.S. Citizenship and Immigration Services, *Introduction to SAVE and the Verification Process for SAVE Users*, tutorial, revised April 2025. Available at: <https://www.uscis.gov/sites/default/files/document/flyers/SAVETutorial%20-%20April%202025%20Updates.pdf>.

¹⁴⁵ “If the user agency receives a prompt to request additional verification, they must submit the case for additional verification to receive a SAVE response.” U.S. Citizenship and Immigration Services, “Verification Process,” last updated May 22, 2025. Available at: <https://www.uscis.gov/save/about-save/save-verification-process>.

- c. After completing additional verification, SAVE will:¹⁴⁶
 - ii. return a response, or
 - iii. prompt the user to “Resubmit with Docs,” which means the user must upload a copy of the applicant’s immigration document for further review verification. SAVE will then return a final response.

The chart below illustrates how a voter citizenship verification request moves through SAVE and SSA with a focus on manual review.

Figure 5: SAVE Processing of Sample Transaction



¹⁴⁶ Ibid.

The secondary verification process not only creates new administrative burdens for election offices, but if after all required steps SAVE does not verify the case as a U.S. citizen, USCIS states that “the user agency is required to contact the individual to obtain proof of U.S. citizenship and provide the individual with an opportunity to contact the appropriate federal agency to correct their records prior to a final decision.”¹⁴⁷ For election administrators, this introduces significant logistical and legal complexities. For voters, especially those without ready access to documentary proof of citizenship, this process can create delays and barriers to participation.

When combined with the requirement that “all verification steps required by SAVE must be completed to be considered a final SAVE response,”¹⁴⁸ it becomes clear that SAVE cannot be reliably used to rule out voters based on citizenship status.

The effort to make SAVE more accessible to election administrators by accepting SSN4 as a unique identifier may make matches less accurate, depending on how it is implemented

USCIS’s move to accept the last four digits of an SSN for SAVE queries lowers barriers for election offices that rarely have immigration identifiers and often do not collect full SSNs at registration. Aside from five states (New Mexico, Kentucky, South Carolina, Tennessee, and Virginia) that are permitted to collect 9-digit SSNs at registration, election officials typically rely on state driver’s license or ID numbers and may only request a partial SSN if those are unavailable.¹⁴⁹ Some states attempt to supplement missing SSNs through partnerships with motor vehicle agencies (as we recommend in this report), but this practice is neither standardized nor widespread.

The move to accept SSN4 for SAVE queries risks lowering the quality of matches. A full SSN can function as a near-unique identifier, while SSN4 cannot. As a result, a SAVE query with SSN4 will have to lean more heavily on name and date of birth to match records.

In general, the combination of name, date of birth, and SSN4 can produce high-quality matches, but the quality ultimately depends on how the matching is executed.¹⁵⁰ Moving from full Social Security numbers to SSN4 can increase the chance of **false positives** (erroneously “matching” the wrong person) and **false negatives** (failing to find the right record). That’s due to both:

¹⁴⁷ U.S. Citizenship and Immigration Services, “Voter Registration and Voter List Maintenance Fact Sheet,” 2025, accessed August 18, 2025. Available at: <https://www.uscis.gov/save/current-user-agencies/guidance/voter-registration-and-voter-list-maintenance-fact-sheet>.

¹⁴⁸ Ibid.

¹⁴⁹ Social Security Administration, “SSA Open Data | HAVV Transactions by State,” n.d., accessed July 15, 2025. Available at: <https://www.ssa.gov/data/havv/>.

¹⁵⁰ Sharad Goel, Marc Meredith, et al., “One Person, One Vote: Estimating the Prevalence of Double Voting in U.S. Presidential Elections.” *American Political Science Review*, 114(2): 456–69, March 6, 2020. Available at: <https://doi.org/10.1017/s000305541900087x>.

1. **Fuzzy matching.** Typos, nicknames, hyphenations, diacritics, transposed digits, and missing fields in either the voter record or the underlying federal files push systems toward “fuzzier” name matching. Fuzzy matching is designed to match names that may be similar but not identical, such as matching “John” with “Jonh,” “Jonathan,” or even “Jack.”

Depending on how it is configured, fuzzy matching can apply different criteria and tolerance thresholds for such variations. Without rigorous testing and transparency around these thresholds, it is unclear to what extent reliance on fuzzy matching may compromise the accuracy of SAVE matches.

2. **Coincidence.** Because there are 9,999 possible values of an SSN4 (0000 is not assigned),¹⁵¹ it is very unlikely that any two distinct people with the same name and same date of birth will also share the same SSN4. However, even a very small false positive rate could produce nontrivial numbers of coincidental matches. A spokesperson for USCIS stated that about 50,000 people have a name, date of birth, and SSN4 that match those of at least one other person, but did not provide further details.¹⁵²

In short, accepting SSN4 makes SAVE more usable but potentially less precise. Additional research and quality testing are needed before cases submitted with name, date of birth, and SSN4 are considered reliable.

Data sharing between SSA and SAVE raises unresolved legal and privacy concerns

Election officials have long used SSA’s Help America Vote Verification system to verify the identity of applicants without a driver’s license or state identification number.¹⁵³ Yet, while that system confirmed that an individual (or individuals) with that name, date of birth, and SSN4 exists and is not believed to be deceased, it did not transmit information on citizenship. When election officials have requested citizenship information from SSA in the past, those officials have reported that SSA declined, maintaining that it cannot share that information under federal privacy laws.¹⁵⁴ SSA explains that “much of the data managed by the SSA is sensitive and protected by privacy laws, the Internal Revenue Code, and other statutes. While some data can be anonymized for public release, a significant portion cannot be disseminated.”¹⁵⁵

¹⁵¹ Carolyn Puckett, “The Story of the Social Security Number,” *Social Security Bulletin* 69(2): 55–74, 2009. Available at: <https://www.ssa.gov/policy/docs/ssb/v69n2/v69n2p55.html>.

¹⁵² David Jennings, Presentation on USCIS SAVE System at National Association of State Election Directors (NASSED) conference, Oklahoma City, OK, July 23, 2025.

¹⁵³ Social Security Administration, “SSA Open Data | HAVV Transactions by State,” n.d., accessed July 15, 2025. Available at: <https://www.ssa.gov/data/havv/>.

¹⁵⁴ David Jennings, Presentation on USCIS SAVE System at National Association of State Election Directors (NASSED) conference, Oklahoma City, OK, July 23, 2025.

¹⁵⁵ Social Security Administration, “SSA Open Data | HAVV Transactions by State,” n.d., accessed July 15, 2025. Available at: <https://www.ssa.gov/data/havv/>.

In contrast, USCIS has begun to sidestep these privacy restrictions by pulling data from SSA to validate the citizenship status of U.S.-born citizens. According to USCIS, federal law permits the agency to receive and transmit citizenship information that SSA itself may not lawfully disclose to election officials.¹⁵⁶ Regardless of the merits of that interpretation, others have raised additional concerns related to the Privacy Act of 1974.¹⁵⁷

For now, this workaround expands the scope of citizenship verification but raises important questions about the safeguards in place to ensure that officials use the information appropriately. These questions center on the potential for data submitted for voter registration verification to be repurposed by other components of the DHS for enforcement, intelligence, or investigatory functions.

According to USCIS’s System of Records Notice for SAVE:

“Information stored in DHS/USCIS-004 Systematic Alien Verification for Entitlements Program System of Records may be shared with other DHS Components that have a need to know the information to carry out their national security, law enforcement, immigration, intelligence, or other homeland security functions.”¹⁵⁸

This means that other DHS entities can access and use data submitted by election officials to verify a voter’s citizenship status (as well as SAVE’s response to that individual’s query) for purposes entirely unrelated to elections, including legal or immigration enforcement.

Unlike the HAVV system, which is governed by Section 303 of the Help America Vote Act and limits the use of transmitted data strictly to election administration, SAVE has no statutory firewall preventing repurposing for investigative use. This gap creates real privacy risks and has the potential to chill participation, especially among newly naturalized citizens. These new citizens may be reluctant to engage with the voter registration process if they believe that doing so could inadvertently trigger scrutiny or enforcement.

States are also wary that any SAVE responses indicating an applicant is not a citizen could be used to initiate federal investigations into that state’s registration or list maintenance practices.

¹⁵⁶ David Jennings, Presentation on USCIS SAVE System at National Association of State Election Directors (NASSED) conference, Oklahoma City, OK, July 23, 2025. [8 U.S.C. § 1373](#).

¹⁵⁷ Justin Levitt, “The Trump administration is building a national citizenship data system,” *Election Law Blog*, June 29, 2025. Available at: <https://electionlawblog.org/?p=150687>.

¹⁵⁸ U.S. Department of Homeland Security, “System of Records Notices (SORNs) | Homeland Security,” last updated June 30, 2025. Available at: <https://www.dhs.gov/system-records-notice-sorns>.

Little consideration has been given to what procedural protections should be offered to voters flagged as noncitizens.

Ultimately, election officials should expect that some efforts to identify noncitizens registered to vote will produce errors—individuals flagged as noncitizens will in fact be citizens. In the context of identifying voters who have moved addresses, the potential for disenfranchisement motivated a series of federal procedural protections. As reviewed above, the NVRA requires that election officials typically wait between two and four years to cancel the registration of an individual they believe has moved in case the individual appears to vote in the interim period.

In contrast, while the National Voter Registration Act offers some general protections to all registrations, the NVRA is silent about the specific process of canceling the registration of potential noncitizens.¹⁵⁹ The act contains no specific substantive standard for the reliability of evidence that a registrant is a noncitizen or specific procedural protections to guard against disenfranchisement. As a result, there is a concern that citizens wrongly flagged as noncitizens may be disenfranchised without procedural protections in place to correct errors.

Case study: Virginia

In Virginia, the Department of Motor Vehicles is required to ask all customers about their citizenship status during transactions.¹⁶⁰ Each month, the motor vehicle department transmits a list of individuals who responded “No” to the citizenship question to the Virginia Department of Elections (ELECT), which then transmits that information to the relevant local registrar.

This process raises the risk of inadvertently removing eligible citizens, as it’s likely that some individuals flagged as noncitizens at the motor vehicle department may have since naturalized. This issue is particularly likely if an individual indicated that they were not a citizen months or years prior to naturalization and then attempted to register to vote after naturalizing. Without mechanisms to capture those updates, the system can inadvertently remove eligible voters.

Under the NVRA, voters suspected of having moved are typically afforded a two-election-cycle window—spanning two to four years—before their registration can be canceled. In contrast, individuals flagged through motor vehicle department data in Virginia have just 14 days to affirm their citizenship before they are removed from the rolls.

¹⁵⁹ [52 U.S.C. § 20507\(b\)](#) (“Any State program or activity to protect the integrity of the electoral process by ensuring the maintenance of an accurate and current voter registration roll for elections for Federal office— (1) shall be uniform, nondiscriminatory, and in compliance with the Voting Rights Act of 1965.”); [52 U.S.C. § 20507\(c\)\(2\)\(A\)](#) (“A State shall complete, not later than 90 days prior to the date of a primary or general election for Federal office, any program the purpose of which is to systematically remove the names of ineligible voters from the official lists of eligible voters.”).

¹⁶⁰ [Code of Virginia § 24.2-410.1](#).

Given that few voters respond to confirmation notices, some eligible citizens will miss this narrow window and be incorrectly removed, especially if they no longer anticipate follow-up related to past motor vehicle department interactions. One Virginia election official also noted that “well documented, substantial mail delays in Virginia” make the 14-day timeline infeasible as well.

For example, NPR reported on the case of Nadra Wilson of Lynchburg, VA, who received a letter requesting citizenship proof after it was first sent to an old address and then forwarded.¹⁶¹ By the time she received it, the 14-day deadline had passed. Wilson, who was born in the United States and is a U.S. citizen, was understandably puzzled: “I was born in Brooklyn, NY—I’m a citizen,” she told NPR, showing her American passport as proof.

Solutions

Election offices may be able to leverage motor vehicle department records to determine citizenship status.

One practice, as seen in Colorado and Arizona, involves using motor vehicle department records to review the documents an individual used to obtain a state-issued ID or driver’s license. In these models, the motor vehicle department shares the types of documents an individual used to obtain an ID with the state election office. Those documents, such as a birth certificate or passport, can often confirm citizenship as well as identity. By learning more about the documents an individual provided, election officials gain further insight into an applicant’s status, allowing them to flag individuals who may warrant further review while avoiding unnecessary removal of eligible citizens.

Implementing such a system would require a significant investment of time and resources in both state motor vehicle departments and election offices, as not all motor vehicle departments currently retain or categorize documentation in a way that supports this level of analysis. The need for investment and coordination mirrors similar issues in voters’ mobility, meaning many of the solutions outlined in the prior section apply here as well.

USCIS’s SAVE system could help affirm citizenship when unclear.

When motor vehicle department-based or other state-level back-end verification does not yield a clear answer in cases where a voter’s status is uncertain or in dispute, USCIS’s SAVE system can potentially serve as a valuable tool for affirming citizenship.

Rather than functioning as a comprehensive screening system, SAVE may be best understood as a supplementary resource that election officials can consult when they encounter ambiguous records (for instance, when the documents a voter uses to register or get a license don’t prove citizenship,

¹⁶¹ Jude Joffe-Block, “U.S. Citizens Are among the Voters Removed in Virginia’s Controversial Purge,” *Morning Edition*, NPR, October 30, 2024. Available at: <https://www.npr.org/2024/10/29/nx-s1-5169204/virginia-noncitizen-voter-purge>.

or when a voter was previously flagged as a noncitizen but is believed to have since naturalized). In such cases, SAVE can provide a quick, low-cost mechanism to confirm updated citizenship status using federal records, potentially resolving the discrepancy without burdening the voter or triggering unnecessary administrative delays.

However, SAVE's design and its current limitations mean that, for the time being, officials should use it only to confirm eligibility, not to disqualify individuals. A lack of confirmation in SAVE does not mean a person is ineligible to vote, and USCIS guidance explicitly instructs agencies not to treat noncitizen results as definitive. Until rigorous testing and evaluation is conducted, SAVE's most appropriate use in elections may be as a tool for clarifying edge cases, not as a foundation for large-scale screening or canceling registration. When used carefully and narrowly in this way, the system could offer election officials a practical way to resolve certain citizenship questions without compromising access or due process.

Increasing the frequency of SSNs on voter registration lists may enhance election officials' ability to verify citizenship.

As noted above, we recommend that states prioritize partnerships with their motor vehicle departments to backfill missing Social Security numbers as allowed by state law. In the mobility context, SSNs can serve as a unique national identifier that makes it easier to confirm matches both between and within states. This approach would also enable election officials to query federal databases through SAVE.

Policymakers should adopt safeguards that allow voters to affirm citizenship before removal.

When back-end verification suggests that a registered voter may not be a U.S. citizen, election officials should adopt procedural safeguards that prevent premature removal from voter rolls based on incomplete or error-prone data. The NVRA's standard approach for a change of address gives voters two to four years to affirm their eligibility before removal. A similar "cure period" could be adapted for verifying citizenship.

For example, instead of automatic cancellation after a 14-day notice period as in Virginia, voters flagged as potential noncitizens could be placed in a "challenged" status and required to affirm their citizenship at the polls before they can vote again. This affirmation could be made under penalty of perjury or, in certain cases, by providing documentary proof. If documentary proof were required, individuals who affirm their citizenship but don't have documentary proof on hand should be able to cast a provisional ballot and still have their votes counted once eligibility was confirmed.

One additional safeguard policymakers should consider is investing in expanded language translation capabilities within election offices. When a voter is flagged as a potential noncitizen, they might receive a notice requiring them to reaffirm their eligibility. Translating these notices into additional languages beyond those currently required by federal law could ensure that voters fully understand what is being asked of them, the timeline to respond, and the consequences of inaction. Clear, accessible communication increases the likelihood that eligible voters will respond promptly and with the correct documentation, reducing the risk of wrongful removals.

This benefit extends beyond list maintenance to preregistration and registration processes more broadly. As noted, the National Voter Registration Act requires that registration forms list eligibility requirements, including citizenship, and that applicants sign under penalty of perjury affirming they meet those requirements. Making these forms and instructions available in more languages could help ensure that applicants fully understand the citizenship attestation before they sign, reducing the risk of noncitizens inadvertently registering to vote.

Policymakers should support efforts by election officials, civil society, and researchers to identify practical approaches to citizenship verification before pursuing major policy changes.

Verifying citizenship remains a technically and legally complex challenge that risks wrongfully disenfranchising voters if changes are implemented poorly. Rather than rushing into reform, policymakers should support efforts to better understand what effective, fair, and implementable verification would require.

Priorities for future research

Future research should explore several critical questions informed by the challenges documented in this report.

- **Voter impact**

What are the likely effects of verification policies on eligible voters, particularly those who lack easy access to documentary proof of citizenship?

How should front-end approaches to citizenship verification resolve name discrepancies between documents (for example, between a birth certificate and current ID following a name change) without creating additional barriers to registration?

- **Data infrastructure and interoperability**

What kinds of citizenship data do election officials currently have access to, and how might state and federal agencies modernize and share citizenship-related data without compromising privacy or creating barriers for eligible voters?

How many states currently backfill Social Security numbers through coordination with their department of motor vehicles? What proportion of voters are they able to recover an SSN for?

- **Lag and accuracy in citizenship records**

How long does it take for naturalization to be reflected in federal and state databases, and what mechanisms could ensure more timely updates?

To date, no formal research has evaluated how long it takes for the SAVE database to reflect newly acquired citizenship or whether the use of SSNs affects the accuracy of its outputs.

- **Administrative capacity and burdens**

The SAVE system has a multistep verification process that few, if any, election offices are equipped to complete.

Can election officials realistically implement additional verification steps, especially if those require individuals to manually submit citizenship documents?

Considerations for policymakers

Given that there is no evidence of noncitizen voting or registration occurring at scale today, and considering the early stage of research into effective verification practices, it would be premature to implement sweeping new citizenship verification policies. Instead, we encourage policymakers to prioritize rigorous, well-designed research and to foster interagency collaboration. These efforts will better equip the election community to address citizenship verification concerns in the future, while minimizing the risk of disenfranchising eligible voters or introducing inaccuracies into the system today.

Before implementing new policies, we encourage lawmakers to weigh the following:

- Is the proposed policy feasible within the constraints of current data systems and intergovernmental bureaucracies?
- What procedural protections will be in place for individuals who may be misidentified as noncitizens?
- How will the policy affect eligible voters, especially those who have recently naturalized or are in vulnerable or mobile populations?
- Does the policy rely on data that election officials can currently access and use appropriately?

Conclusion

Voter list maintenance is a quiet but essential function for election administration. This report outlines how a set of state and federal reforms could improve both the accuracy and completeness of voter registration lists.



Bipartisan Policy Center

1225 Eye St. NW
Suite 1000
Washington, DC 20005
bipartisanpolicy.org
202 - 204 - 2400

Policy Areas

Economy

Energy

Human Capital

Health

Housing

Democracy

The Bipartisan Policy Center and its advocacy affiliate, Bipartisan Policy Center Action (BPC Action), are unique in their approach to addressing the nation's most pressing issues. As the only organization working across the full political spectrum on domestic issues, BPC brings together diverse perspectives to craft data-driven, pragmatic policy solutions. BPC Action then works directly with legislators and other policymakers to turn those solutions into real change.

✕ @BPC_Bipartisan

f facebook.com/BipartisanPolicyCenter

📷 instagram.com/BPC_Bipartisan

in linkedin.com/company/bipartisan-policy-center



Bipartisan Policy Center
Ideas. Action. Results.

1225 Eye St. NW
Suite 1000
Washington, DC 20005
bipartisanpolicy.org