



# GUIDANCE FOR FEDERAL AGENCIES DESIGNATED AS VOTER REGISTRATION AGENCIES UNDER THE NATIONAL VOTER REGISTRATION ACT

On March 7, 2021, President Biden issued an Executive Order ("Voting EO") with the goal of promoting access to voting. One of the key tools for accomplishing this goal laid out in the EO is embracing the historically under used provisions in the National Voter Registration Act (NVRA) of 1993 that allow states to designate federal government agencies, with their consent, as voter registration agencies. The Voting EO encourages these designations by states and requires federal agencies to accept these designations from the states to the greatest extent practicable.

Agency voter registration is not new. Section 7 of the NVRA has long required state offices, such as public assistance programs, and offices serving persons with disabilities, to provide voter registration services to clients of the agencies. The state agencies covered by these provisions of the NVRA are sometimes called "mandatory Section 7 voter registration agencies." Section 7 of the NVRA also requires that states designate other agencies as additional voter registration agencies. The language of the NVRA is clear that pursuant to this requirement, states may designate any federal agency, with the agreement of the agency, to provide voter registration services. While the opportunity is not new, President Biden's Voting EO creates new momentum for states and federal agencies to meet this clear intention of the NVRA.

The NVRA lays out specific requirements for the voter registration services that federal agencies must provide once they accept a designation. These required services should be provided by agencies when they are conducting transactions with persons they serve and are similar to the services that mandatory Section 7 voter registration agencies are required to provide their clients. The experiences of state agencies across the country have demonstrated the most effective ways to provide NVRA voter registration services. These practices can readily be adopted by designated federal agencies with minimal burden on agency personnel.

This document details the specific requirements for designated federal agencies, and it provides detailed guidance on how these designated federal agencies should implement these required voter registration services. It draws on the many years of experience of state agency-based voter registration and includes examples of processes from many states such as Arkansas, Arkansas, California, Ohio, Oklahoma, Oregon, Louisiana, New Mexico and North Carolina.

<sup>&</sup>lt;sup>1</sup> March 7, 2021 Executive Order on Promoting Access to Voting, *available at* https://www.whitehouse.gov/briefing-room/presidential-actions/2021/03/07/executive-order-on-promoting-access-to-voting/ (last visited December 2021).

<sup>&</sup>lt;sup>2</sup> 52 U.S.C. § 20501, et seq.

<sup>&</sup>lt;sup>3</sup> 52 U.S.C. § 20506 (a)(3)(B).

<sup>&</sup>lt;sup>4</sup> See supra n.1, Voting EO, Sec. 4.

<sup>&</sup>lt;sup>5</sup> 52 U.S.C. § 20504, 20506 (a)(2).

<sup>&</sup>lt;sup>6</sup> 52 U.S.C. § 20506(a)(3)(B).

<sup>&</sup>lt;sup>7</sup> 52 U.S.C. § 20506(a)(4)(A) and § 20506(a)(6)(A).

# NECESSARY STEPS FOR VOTER REGISTRATION SERVICES BY DESIGNATED FEDERAL AGENCIES

The NVRA requires all designated federal agencies to take these 3 steps:

- distribute a voter registration application form in a manner that all customers can access;
- II. assist customers with completing the voter registration application form; and
- III. transmit any completed voter registration forms to the appropriate election officials.8

#### I. <u>Distribute Voter Registration Applications Accessibly</u>

Under the NVRA, designated federal agencies have different distribution obligations, depending on what type of interactions they have with the public and the clients they serve. But almost all federal agencies that are considering accepting a state designation provide government benefits, and administer applications, renewals and changes of address for those benefits, and therefore, all these agencies have the same distribution requirements. This subsection provides guidance about those NVRA distribution requirements – the requirements for designated federal agencies each time an individual completes a transaction with the agency that involves an initial application or request for services or benefits, a renewal of benefits or services, or reports a change of address ("Covered Transactions").

All designated federal agencies engaging in Covered Transactions are required to affirmatively distribute voter registration applications, or otherwise provide direct access to voter registration, during those Covered Transactions unless their clients decline to register to vote in writing. <sup>10</sup> This means that a voter registration application should be provided automatically to all clients in the course of each Covered Transaction, without waiting for the individual to affirmatively request one. <sup>11</sup> This serves the NVRA's goal of integrating voter registration as seamlessly as possible into agencies' existing transactions.

<sup>&</sup>lt;sup>8</sup> 52 U.S.C. § 20506(a)(4)(A) (i)-(iii).

<sup>&</sup>lt;sup>9</sup> 52 U.S.C. § 20506(a)(A)(4)(i) & § 20506(a)(6)(A). Designated federal agencies that do not administer applications, renewals or changes of address for benefits programs are also required to distribute voter registration applications, see 52 U.S.C. § 20506(a)(4)(A) (i), but they do not have the same affirmative obligations. They are required to make voter registration applications available upon request to the general public and all whom the agency engages with in the course of its operations. This can be accomplished by letting people know about the opportunity to register to vote and ensuring that the agency has sufficient blank voter registration forms on hand.

<sup>&</sup>lt;sup>10</sup> 52 U.S.C. § 20506(a)(A)(4)(i) & § 20506(a)(6)(A).

<sup>&</sup>lt;sup>11</sup> See id. This affirmative obligation comes from the NVRA requirement to obtain a declination of the opportunity to register to vote in writing. See 52 U.S.C. § 20506(a)(6)(A). Mandatory Section 7 voter registration agencies are required to ask clients if they want to register to vote, see infra n.16, and even if the clients do not respond yes, the agencies are required to provide clients with voter registration applications, unless they obtain a no response in writing. Courts have described this requirement as setting-up an opt-out vs an opt-in dynamic between clients and NVRA agencies. See Valdez v. Squier, 676 F.3d 935, 945-47 (10th Cir. 2012) (citing 52 U.S.C. § 20506(a)(6)); see also Action NC v. Strach, 216 F. Supp. 3d 597, 640 (M.D.N.C. 2016); but see c.f. Scott v. Schedler, 771 F.3d 831 (5th Cir. 2014). The purpose of this requirement is to place the burden of ensuring that clients are aware of their opportunity to register to vote during Covered Transactions on the agency and not the client. While designated federal agencies are not required ask clients the same type of question about whether they want to register to vote as mandatory Section 7 agencies, they do have the same affirmative obligation to distribute voter registration applications to clients. See 52 U.S.C. § 20506(a)(A)(4)(i) & § 20506(a)(6)(A).

#### Paper Voter Registration Application Supply:

Agencies can easily obtain blank forms from state election officials. Most states have a PDF of the state voter registration form on the chief election official's website that can be downloaded and printed. And state election officials are also likely to be willing to directly provide hard copies of the state voter registrations forms to any federal agency that requests them, as they currently do with state voter registration agencies. As discussed further below, designated federal agencies could also distribute the National Mail Voter Registration Form ("NMVRF"), which is accepted by almost every state that requires voter registration.

#### Use a Voter Preference Question and Provide Other Useful Information:

Mandatory Section 7 voter registration agencies are required to ask a question about voter registration, sometimes called the Voter Preference Question. <sup>16</sup> The NVRA does not require that designated federal agencies ask clients a voter registration question, but the practices from the mandatory Section 7 voter registration agencies provide good models for how federal agencies can determine if clients do or do not not want to register to vote. Asking a question about voter registration in writing will allow designated federal agencies to determine whether clients want to register to vote and obtain documentation in writing if a client does not want to register to vote.

Additionally, it is good practice to provide clients with explanatory materials about voter registration. This additional information could include instructions on how to complete the voter registration form, how and where to submit the completed form and how to get assistance with completing the form. These explanatory materials are especially important if the voter registration application is provided during transactions that do not take place either in person or over the phone (e.g., online or mail transactions) because clients will not be able to ask for assistance completing their form during such transactions.

Attached as Exhibit A is a form used by a designated agency in California, the Department of Tax and Fee Administration. This form provides a voter registration question to help clients indicate in writing whether they do or do not want to register to vote, and several pieces of additional helpful information, such as where to get further assistance with voter registration.

<sup>&</sup>lt;sup>12</sup> For an example, see available voter registration applications on the Arizona Secretary of State's website: <a href="https://azsos.gov/sites/default/files/20200417">https://azsos.gov/sites/default/files/20200417</a> AZ Voter Registration Form Printable 0.pdf; see also Florida: <a href="https://www.myfloridaelections.com/Voting-Elections/Register-To-Vote#App">https://www.myfloridaelections.com/Voting-Elections/Register-To-Vote#App</a>; Kansas: <a href="https://www.kssos.org/forms/elections/voterregistration.pdf">https://www.kssos.org/forms/elections/voterregistration.pdf</a> and Maryland: <a href="https://elections.maryland.gov/voterregistration/application.html">https://elections.maryland.gov/voterregistration/application.html</a>. (All last visited December 2021).

<sup>&</sup>lt;sup>13</sup> The Colorado Secretary of State has a portal that helps voter registration agencies request delivery of more voter registration forms online. *See* <a href="https://www.sos.state.co.us/ccorner/NVRAAgencyOrderForms.do">https://www.sos.state.co.us/ccorner/NVRAAgencyOrderForms.do</a> (last visited Dec. 2021).

<sup>&</sup>lt;sup>14</sup> National Mail Voter Registration Form, U.S. ELECTION ASSISTANCE COMM'N, <a href="https://www.eac.gov/voters/national-mail-voter-registration-form">https://www.eac.gov/voters/national-mail-voter-registration-form</a> (last visited Dec. 2021).

<sup>&</sup>lt;sup>15</sup> See 52 U.S.C. § 20503, 20508. There are three exceptions: New Hampshire, North Dakota and Wyoming. See National Mail Voter Registration Form, Instructions, U.S. ELECTION ASSISTANCE COMM'N, <a href="https://www.eac.gov/sites/default/files/eac">https://www.eac.gov/sites/default/files/eac</a> assets/1/6/Federal Voter Registration ENG.pdf (last visited Dec. 2021).

<sup>&</sup>lt;sup>16</sup> 52 U.S.C. § 20506(a)(6)(B). In asking the Voter Preference Question, mandatory Section 7 agencies must use specific language: "If you are not registered to vote where you live now, would you like to apply to register to vote here today?" and include boxes for the client to check "YES" or "NO".

<u>Remote Transactions - Providing Voter Registration Opportunities to Persons during Transactions that</u> <u>are Online, by Mail, or by Telephone:</u>

The NVRA requires that designated federal agencies provide voter registration services with all Covered Transactions, including affirmative distribution of voter registration forms, regardless of whether the Covered Transaction takes place in person or remotely (e.g., online or via telephone or mail) ("Remote Transactions"). Effective distribution of voter registration applications is obviously different during remote transactions than during in-person transactions. But, as shown by the experience of mandatory Section 7 voter registration agencies, this requirement can be easily and effectively met.

First, the voter registration question discussed above can be used during remote transactions. The question does not have to be provided as a separate document, but can be incorporated directly into any online benefits applications. If a client answers the voter registration question "no" in writing during their transactions (for example by clicking a "no" response in an online application) the designated federal agency no long has an affirmative obligation to distribute a voter registration form. <sup>18</sup> Some mandatory Section 7 voter registration agencies use a voter registration question that is a required question in their online application portals, meaning that clients must answer the question and cannot skip over it.

Second, unless a client affirmatively answers the voter registration question "no", the designated federal agency has an affirmative obligation to distribute a voter registration form. <sup>19</sup> It is most effective during a Remote Covered Transaction to provide clients with choices about how they want to receive a voter registration form. As explained below, those distribution choices must include a mail option. Designated federal agencies could also provide a link to the state's online voter registration portal (if available)<sup>20</sup> or provide the option to download a PDF voter registration application.

If the federal agency is providing benefits to individuals residing in different states (for example, through an online portal available nationwide), it could instead mail or provide access to a downloadable PDF of the NMVRF. <sup>21</sup> Federal agencies serving people through remote transactions could also provide a link to Vote.gov, which is administered and kept up-to-date by the General Services Administration ("GSA"), and provides in one location access to voter registration sites across the country. Vote.gov provides

<sup>&</sup>lt;sup>17</sup> See, e.g., Action NC, 216 F. Supp. 3d at 623; Ga. State Conf. of the NAACP v. Kemp, 841 F. Supp. 2d 1320, 1329 (N.D. Ga. 2012); see also U.S. Department of Justice, The National Voter Registration Act of 1993 (NVRA): Questions and Answers, Q24., available at <a href="https://www.justice.gov/crt/national-voter-registration-act-1993-nvra">https://www.justice.gov/crt/national-voter-registration-act-1993-nvra</a> (last visited Dec. 2021).

<sup>&</sup>lt;sup>18</sup> See supra, n.11.

<sup>&</sup>lt;sup>19</sup> See supra, n.11.

<sup>&</sup>lt;sup>20</sup> As of October 2020, 40 states provided online voter registration. *See* Online Voter Registration, National Conference of State Legislatures, *available at* <a href="https://www.ncsl.org/research/elections-and-campaigns/electronic-or-online-voter-registration.aspx#table">https://www.ncsl.org/research/elections-and-campaigns/electronic-or-online-voter-registration.aspx#table</a> (last visited Dec. 2021). However, in many states online voter registration is only available to some subset of the population such as those who have a driver's license or other DMV record. *See id.* 

<sup>&</sup>lt;sup>21</sup> Per the terms of the NVRA, the NMVRF is single voter registration application that is developed by the Election Assistance Commission and can be used to register to vote in the vast majority of states. *See* 52 U.S.C. § 20508; *see also supra* n.14 & n.15. The NVRA specifically allows that voter registration agencies can distribute the federal mail voter registration form. *See* 52 U.S.C. § 20506(a)(6)(A)(i).

access to the online voter registration systems for all states that have such systems and provides access to download a PDF of the NMVRF in all 15 languages that are available.<sup>22</sup>

#### Ensure Customers Can Request a Voter Registration Application be Sent Through the Mail:

While providing online links can be an effective way to provide access to voter registration, the NVRA also requires that any designated federal agencies offer to mail a paper voter registration application to any client who requests one during a Remote Covered Transaction.<sup>23</sup> Effective voter registration must be available to persons who do not have access to or cannot use online voter registration systems, or cannot use a voter registration form that must be downloaded and printed out. Not everyone has regular access to a computer and a printer. Moreover, most states that allow online voter registration require persons to have a driver's license or state ID card,<sup>24</sup> which some individuals—particularly low-income voters, voters of color, and elderly voters—do not have.<sup>25</sup>

This does not necessarily require a separate mailing. When a voter registration application is mailed to a client, it can be included with other agency materials that are already being mailed to clients. <sup>26</sup> Another option that some mandatory Section 7 voter registration agencies use is to automatically mail a voter registration application to the client each time they conduct a Covered Transaction that does not take place in person. Mandatory Section 7 voter registration agencies in both Alabama and Massachusetts use this approach.

In addition to the voter registration application, a voter registration mailing should include a cover letter providing clients with information about the identity of the agency sending the mailing, the eligibility requirements for registering to vote, and how to return a completed voter registration application to election officials. The cover letter should also explain that individuals should mail completed voter registration applications to election officials at the address provided on either the enclosed state voter

<sup>&</sup>lt;sup>22</sup> See <a href="https://vote.gov/">https://vote.gov/</a> (last visited Dec. 2021). It is a best practice for designated federal agencies to provide voter registration services in whatever languages they provide their clients other services.

<sup>&</sup>lt;sup>23</sup> See 52 U.S.C. § 20506(a)(6)(A). Under President's Biden EO, GSA has been directed to improve the interface with voter registration services provided on Vote.gov. Voting EO Section 5, supra n.1. We are advocating that these improvements providing better language assistance; and providing an option that is accessible to all individuals with disabilities; See Comment on Federal Register Document #2021-12619 from the ACLU and Demos (Comment ID NIST-2021-0003-0147), available at <a href="https://www.regulations.gov/comment/NIST-2021-0003-0147">https://www.regulations.gov/comment/NIST-2021-0003-0147</a>. In our comments, we also recommended that Vote.gov provide individuals with the opportunity to request a voter registration application be mailed to them. If this change was made to Vote.gov, designated federal agencies could rely upon Vote.gov to provide their clients with required option to receive a voter registration applications in the mail.

<sup>&</sup>lt;sup>24</sup> See supra n.20.

<sup>&</sup>lt;sup>25</sup> For example, eleven percent of U.S. citizens do not have any form of government-issued photo identification. See Brennan Center for Justice, Citizens without Proof: A Survey of Americans' Possession of Documentary Proof of Citizenship and Photo Identification (New York: Brennan Center for Justice, 2006), available at <a href="http://www.brennancenter.org/sites/default/files/legacy/d/download\_file\_39242.pdf">http://www.brennancenter.org/sites/default/files/legacy/d/download\_file\_39242.pdf</a>, at 1 (last visited Dec. 2021). Also, because of this limitation on who can use most state online voter registration systems, we recommend that before an agency re-directs clients to such systems that they provide a statement explaining that there might limitations and, if possible, what the specific limitations are.

<sup>&</sup>lt;sup>26</sup> It is best practice that voter registration applications that are mailed should be sent with postage pre-paid so that clients do not have to pay for their own postage to return the form to complete their registration.

registration application or NMVRF, as appropriate.<sup>27</sup> Attached here as Exhibit B is a cover letter used by the North Carolina Department of Health and Human Services when sending voter registration application forms to clients through the mail.

Attached as Exhibit C is a document that shows how voter registration services are offered by the Ohio Department of Job and Family Services ("ODJFS") to their clients during Remote Covered Transactions. The language and links are incorporated seamlessly into ODJFS's online benefits application portal. This is a good model because:

- It provides clients with multiple options for how to receive a voter registration application; giving them, among others, the option to use the state's online voter registration system and to request an application form in the mail;
- It provides the client with all the information they need about who can use Ohio's online voter registration system; and
- It provides information about how a client can get assistance with voter registration.

#### II. Provide Assistance to Clients Completing Voter Registration Applications

In addition to distributing voter registration applications, all designated federal agencies must provide assistance to clients in completing their voter registration application. <sup>28</sup> This should include affirmatively asking all clients if they want help with their voter registration application, similar to any assistance the agencies already provide to clients in completing the forms clients use to receive agency services. This assistance should include ensuring that clients have completed and signed their voter registration application. Verifying that voter registration application forms are complete does not require any special expertise, involves only a few simple checks, and helps ensure applications submitted by eligible voters are accepted.

As an example, Exhibit D is a checklist used by staff at mandatory Section 7 voter registration agencies in Oklahoma, such as the Department of Human Services, when providing clients with assistance to ensure that voter registration application forms are complete.

Although not specifically required by the NVRA for any voter registration agencies, it is also a best practice, where possible, to provide clients with a voter registration form that is pre-populated with any information the agency has already collected about an individual in connection with the agency's services, such as the individual's name, address, and date of birth. Doing so will reduce the amount of repetitive information the client has to provide for voter registration purposes, and will also reduce the amount of assistance the agency may need to provide in completing the voter registration application.<sup>29</sup>

<sup>&</sup>lt;sup>27</sup> The instructions for every state included with the National Mail Voter Registration Form provide the correct mailing address. *See National Mail Voter Registration Form*, U.S. ELECTION ASSISTANCE COMM'N, <a href="https://www.eac.gov/voters/national-mail-voter-registration-form">https://www.eac.gov/voters/national-mail-voter-registration-form</a> (last visitedDec. 2021). *See also supra* n.12. <sup>28</sup> 52 U.S.C. § 20506(a)(A)(4)(ii).

<sup>&</sup>lt;sup>29</sup> In addition to pre-population of paper forms, another option to help streamline and automate both the assistance and the distributions requirements of the NVRA is federal agencies connecting their client databases directly with a state's online voter registration system through the state's application programming interface ("API"). This would allow federal agencies to share electronically and automatically with state election officials for any client who wants to register to vote all the required information for voter registration that the federal agency already has within its database. The same level of assistance and distribution of a paper voter registration application would not be required if such a system could be set-up. Several states have and currently use APIs as

#### Providing assistance during remote transactions:

Providing voter registration assistance can be more challenging during Remote Covered Transactions, such as those online or by mail. Nonetheless, state voter registration agencies have successfully been providing assistance to clients during Remote Covered Transactions for years, and designated federal agencies can adopt similar practices. One model used by state voter registration agencies is simply to provide clients with information about how to contact state election officials if they have questions. Most state chief election officials have a toll-free telephone number for the public to call and ask questions. The Election Assistance Commission and USA.gov have this contact information available for all states on a single landing page on their sites. <sup>30</sup> This information could be provided on federal agency websites as part of any application portal.

Exhibit E is a screen shot of the voter registration page from the online portal used for Medicaid applications by the Louisiana Department of Health and Hospitals. The information makes clear that assistance is available and provides the toll-free number for the Louisiana Secretary of State.

#### Ensure assistance is Non-partisan and Not Coercive:

The NVRA requires that voter registration services provided by any voter registration agency, include any designated federal agencies, are non-partisan. The NVRA mandates that any person who provides voter registration assistance shall not:

- seek to influence an applicant's political preference or party registration;
- display any such political preference or party allegiance;
- make any statement to an applicant or take any action the purpose or effect of which is to discourage the applicant from registering to vote; or
- make any statement to an applicant or take any action the purpose or effect of which is to lead
  the applicant to believe that a decision to register or not to register has any bearing on the
  availability of services or benefits.<sup>31</sup>

The NVRA also requires that mandatory Section 7 voter registration agencies provide clients with additional information to ensure that government employees do not unduly pressure or influence clients while offering voter registration assistance.<sup>32</sup> These provisions of the NVRA provide good guidance about information that can be shared with clients during Covered Transactions. The most helpful points from the NVRA that designated federal agencies could provide clients are:

- Applying to register or declining to register to vote will not affect the amount of assistance that
  a client will receive from the agency, and that information will not be used for any purpose
  other than voter registration;
- The agency will provide assistance in filling out the voter registration application form, if the client so chooses; and

part of their current online voter registration systems. *See, e.g.,* <a href="https://www.michigan.gov/sos/0,4670,7-127-1640">https://www.michigan.gov/sos/0,4670,7-127-1640</a> 9150-531981--,00.html. The EO requires that federal agencies consider "ways to facilitate seamless transition from agencies' websites directly to State online voter registration systems." *See* EO at Sec. 3(a)(ii), *supra* n.1.

<sup>&</sup>lt;sup>30</sup> See <a href="https://www.eac.gov/voters/election-day-contact-information">https://www.usa.gov/election-office</a> (last visited Dec. 2021).

<sup>&</sup>lt;sup>31</sup> 52 U.S.C. § 20506(a)(5).

<sup>&</sup>lt;sup>32</sup> 52 U.S.C. § 20506(a)(6)(B).

 No one should interfere with a client's right to register or to decline to register to vote, their right to privacy in deciding whether to register or in applying to register to vote, or their right to choose their own political party or other political preference.<sup>33</sup>

Exhibit F is a sample of an information sheet used by the North Carolina Department of Health and Human Services when discussing voter registration with clients during Covered Transactions.

#### III. <u>Collect and Deliver Voter Registration Applications</u>

Designated federal agencies must accept any completed voter registration applications retuned by their clients and transmit them to the appropriate state election official. <sup>34</sup> Collecting and transmitting completed applications to state election officials is not only required by the NVRA but is essential to ensure that clients actually get registered. When clients take the applications home to complete later, they often don't finish the process or are prevented from doing so by not having access to postage or the time to mail the form back to election officials. Collecting completed forms and returning them directly to election officials simplifies the process for members of the public and allows the agency to provide clients with a compelling reason to complete the registration process at the time of the transaction.

During in-person transactions, agency officials of designated federal agencies should establish a system to collect the forms and deliver them to the appropriate state or local election officials. Most state voter registration agencies create a central location in the office to deposit the completed forms and then task a specific member of the agency staff to either hand deliver or mail all the completed forms to relevant election officials once a week, with more frequent delivery closer to voter registration deadlines before federal elections. The current names and addresses of the relevant state election officials are usually printed on the state voter registration applications and are included for all states with the instructions for the NMVRF.<sup>35</sup>

Most clients who receive a voter registration application through a remote transaction (e.g., by mail) will return their completed form directly to state election officials, assuming they receive adequate instructions on how to do so. However, clients also have the option to return their voter registration forms to the federal agency via mail or by delivering it in person, for the agency to submit to election officials. Designated federal agencies, therefore, must develop systems similar to those for in-person transactions to ensure that when this happens, the agency deliveries the completed voter registration forms to state election officials in a timely manner.

#### **Timelines:**

When a designated federal agency collects complete voter registration applications, the NVRA requires that the application forms are transmitted to state election officials in a timely way. The NVRA requires that all voter registration applications be submitted to state election officials no more than 10 days after the date the agency accepts the application. This time is shortened when a registration application is collected within 5 days before the last day for registration to vote in an

34 52 U.S.C. § 20506(a)(4)(iii).

<sup>33</sup> See id.

<sup>&</sup>lt;sup>35</sup> See supra n.12 & n.14.

<sup>&</sup>lt;sup>36</sup> 52 U.S.C. § 20506(d)(1).

election; in that case, the application must be transmitted to the appropriate State election official no later than 5 days after the date of acceptance.<sup>37</sup> The voter registration deadlines before each federal election can usually be found on state voter registration forms, as a part of the NMVRF instructions, or at Vote.gov. It is important to transmit voter registration forms to state officials as quickly as possible. Doing so allows election officials sufficient time to process them before any upcoming elections, to ensure that eligible registrants can actually vote.

#### ADDITIONAL STEPS THAT FACILITATE NVRA RESPONSIBILITIES

#### **Training**

Training agency staff to carry out their responsibilities in assisting clients with voter registration is an important component in effective implementation. In our experience, training staff to follow these simple procedures, and to answer applicants' voter registration questions, can be accomplished in about 30 minutes, and thus is not a significant burden. Most state Voter Registration Agencies provide training once a year to all of their agency employees who provide voter registrations services, and as a part of the on-boarding training for all new employees. And most states already have training materials for their own state agencies that can be made available and re-tooled as needed for federal agencies.

Exhibit G is an example of a simple training guidance document that the California Secretary of State has provided to agency staff to ensure familiarity with required voter registrations services during Covered Transactions.

#### **Tracking and Reporting**

The NVRA requires that states report to the Election Assistance Commission ("EAC") the number of voter registration applications and the source of those applications.<sup>38</sup> This obligation includes collection and reporting the aggregate number of voter registration forms collected from mandatory Section 7 voter registration agencies. Given this, it is a best practice, if possible, for any designated federal agencies to participate in the existing tracking and reporting of voter registration data that other Section 7 voter registration agencies participate in within the states.

For example, many states use voter registration forms that are coded so that election officials can determine that the source of the voter registration application is a mandatory Section 7 voter registration agency. In some circumstances, it would be appropriate for designated federal agencies to obtain and distribute these coded Section 7 forms that the state is already using. Where coded forms are not used, many mandatory Section 7 voter registration agencies simply do a weekly hand tally of how many voter registration applications they collect and provide to election officials. Any designated federal agency could also use such a tally system.

Attached as Exhibit H are several samples of tally sheets and reporting documents used by state voter registration agencies.<sup>39</sup>

<sup>&</sup>lt;sup>37</sup> 52 U.S.C. § 20506(d)(2).

<sup>&</sup>lt;sup>38</sup> 52 U.S.C. § 20509(a)(3); 11 C.F.R. § 9428.7(b)(6).

<sup>&</sup>lt;sup>39</sup> There are also ways to track total voter registration numbers during remote or other computer transactions. For example, the EO requires modernization of the Vote.gov website. *See supra* n.23. The updates could include adding programing to track the source of the application portals that send clients to Vote.gov to register to vote. Similarly, state election officials may be able to help with this, where technologically possible, by providing a

These tracking practices are important to monitor that employees are following the voter registration procedures, and to measure the impact of the voter registration services being provided pursuant to the EO and related NVRA designation. But it is important to ensure that any tracking system only tracks aggregate numbers of total voter registration—it should not contain any personal identifying information about the individuals who register to vote through the designate federal agency.

#### **CONCLUSION**

Congress passed the NVRA in 1993 to increase the number of eligible persons registered to vote in federal elections. President Biden's Voting EO is consistent with the stated purpose and goals of the NVRA. When enacting the NVRA, Congress found that it is the "duty of the Federal, State, and local governments to promote the exercise of [the] right to vote." Congress further stated that the law's purpose was to establish "procedures that will increase the number of eligible persons who register to vote in elections for Federal office" and "make it possible for Federal, State, and local governments to implement [the law] in a manner that enhances the participation of eligible persons as voters in elections for Federal office." In addressing federal departments and agencies in the Voting EO, President Biden noted that "[i]t is our duty to ensure that registering to vote and the act of voting be made simple and easy for all those eligible to do so." Ederal agencies should embrace this charge from the President and honor the clear original intent of the NVRA.

unique URL that allows them to track the source of traffic to their online registration sites. The Washington State Secretary of State ("SOS") currently provides and tracks a separate URL for each voter registration agency within the state. Designated federal agencies could be receive their own URL from the Washington SOS.

<sup>&</sup>lt;sup>40</sup> 52 U.S.C.A. § 20501(a)(2) (emphasis added).

<sup>&</sup>lt;sup>41</sup> 52 U.S.C.A. § 20501(b).

<sup>&</sup>lt;sup>42</sup> Supra note 1.

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### **Exhibit A**

# California

Guidance for the voter registration procedures of California's Department of Tax and Fee Administration, a designated voter registration agency that is not a mandatory voter registration agency

#### Board of Equalization

COMPLIANCE POLICY AND PROCEDURES MANUAL

### MISCELLANEOUS

295.000

#### ASSISTANCE FOR HEARING IMPAIRED TAXPAYERS

295.005

When helping hearing impaired taxpayers who require American Sign Language assistance, staff should contact the EEO Counselor/Bilingual Coordinator at 916-322-0064 to obtain access to the Bilingual Volunteer List or an ASL interpreter.

## IMPLEMENTATION OF NATIONAL VOTER REGISTRATION ACT (MOTOR VOTER BILL)

295.010

Under the National Voter Registration Act of 1993 (NVRA), certain state and local agencies are required to ask whether their clients are registered to vote. If the clients are not registered, the agencies must offer them the opportunity to register and submit the voter registration form to local election officials. The NVRA requires the participation of agencies issuing driver's licenses (hence, "motor voter"), and of agencies providing public assistance or services to the disabled. The NVRA also allows states to designate other agencies as "voter registration agencies". The effective date of the NVRA is January 1, 1995.

In his executive Order W-98-94 the Governor designated "State Board of Equalization district offices which provide services to the public" as voter registration agencies. The BOE has determined this to include all Sales and Use Tax district and branch offices.

#### NVRA Requirements

As a designated voter registration agency, the BOE district offices are required to:

- Provide a BOE-6, National Voter Registration Act (NVRA) Declination Form, or an electronic equivalent if services are provided electronically, to taxpayers who request service or assistance with registration, renewal, or account maintenance. The SOS website also has a voter preference form that may be used and is available in several languages, 01/13 NVRA Voter Preference Form. The BOE has defined electronic services to mean all core processes that allow tax and fee payers to electronically apply for services. The process of electronically filing returns or making payments does not meet the criteria of a request or application for assistance with a core service. The tax or fee payer is not requesting a service; they are only completing a required transaction.
- Provide a mail voter registration application form to sole proprietors who have responded that they would like to register to vote on the BOE-6.
- Provide assistance in completing the BOE-6 and voter registration application forms.
- Transmit completed voter registration to any county registrar of voter's office within 10 days.
   In California, this is any county registrar of voters, regardless of the county of residence of the client registering.
- Ensure that those who provide the services described in NVRA section 1973gg-5(a)(4)(A) do not: (a) seek to influence an applicant's political preference or party registration; (b) display any political preference or party allegiance; (c) make any statement to an applicant or take any action to discourage the applicant from registering to vote; or (d) make any statement to an applicant or take any action which leads the applicant to believe that a decision to register or not to register has any bearing on the availability of services.
- Ensure that no information relating to a declination to register to vote is used for any purpose other than voter registration. The state shall not disclose information relating to a declination to register to vote or to the identity of a voter registration agency through which any particular voter is registered. The forms are not public information, and therefore, the BOE may not disclose who has registered to vote through BOE district offices or who has declined to register. All completed BOE-6 declination forms are to be retained by the BOE and not transmitted to the county registrars.

#### COMPLIANCE POLICY AND PROCEDURES MANUAL

#### IMPLEMENTATION OF NATIONAL VOTER REGISTRATION ACT (MOTOR VOTER BILL)

(CONT.2) 295.010

Maintain confidentiality with respect to the retained completed preference forms for a period
of two years. The NVRA requires a voter's decision to register or decline to register and
the location where an applicant registers to vote to be kept confidential. Voter preference
forms are not public information. The preference forms should be stored in a central,
chronological file, as they are subject to audit.

#### Core Electronic Services

All new electronic core services that allow tax and fee payers to electronically apply for service will incorporate the electronic voter preference form as part of their implementation.

#### EXHIBIT B

#### NATIONAL VOTER REGISTRATION ACT (NVRA) REPORTING FORM

Please complete and send this form to your county elections office at the end of each calendar month.

Agency Name	STATE BOARD OF EQUALIZATION	
Local Address		
BOE Contact		
Phone		
Date		
Month	Total Number of Voter Registration Cards Sent to County Elections Office	Total Declination Forms Received* (Do not send declination forms to the county elections office.)

<sup>\*</sup>Under NVRA requirements, the declination form must be filled out when a person declines to register to vote or when a person chooses to take the voter registration card home to fill out at a later time. Therefore, the total number of declinations reflects only the number of people who declined to register at the agency office.

### **Exhibit B**

## **North Carolina**

North Carolina Department of Health and Human Services cover letter sent to clients emphasizing individuals must be U.S. citizens to register to vote, and then provides some Spanish language assistance





P.O. Box 27255 Raleigh, NC 27611-7255 Mailing Address Dirección Postal

elections.sboe@ncsbe.gov E-mail Correo electrónico 919) 814-0700 *or* (866) 522-4723 **Phone Teléfono** 

(919) 715-0135

#### Notice of Voter Registration Services

You are receiving this letter because of your recent interaction with a county DSS office. The National Voter Registration Act requires the county DSS office to provide the client with an opportunity to register to vote. During your interaction with the county DSS office, you may have indicated that you would like to register to vote at the address at which you currently live. Enclosed is a voter registration application. Once completed, you may send the form directly to the State Board of Elections at the address provided on the back of the voter registration form or you may return it to your local county DSS office. Only U.S. citizens are eligible to register to vote. You must meet all the qualifications listed at the top of the enclosed voter registration application and in the signature block of the application. If you do not meet these qualifications, do not return the enclosed application. If you wish to be registered to vote, please complete and sign the enclosed form confirming, under penalty of perjury, that you meet the qualifications to vote and that the information on the application is correct. Please contact the State Board of Elections at 1-866-522-4723 if you desire assistance in completing the application or if you have questions concerning this notice. If you would prefer a copy of the enclosed voter registration form in Spanish, please visit <a href="https://www.ncsbe.gov/NVRA/01">https://www.ncsbe.gov/NVRA/01</a>. You may also call 1-866-522-4723.

#### Aviso de Servicios de Inscripción del Votante

Usted está recibiendo esta carta debido a su reciente interacción con una oficina de la División de Servicios Sociales (DSS) del condado. La Ley Nacional de Inscripción de Votantes requiere que la oficina de DSS proporcione al cliente la oportunidad de inscribirse para votar. Durante su interacción con la oficina de DSS del condado, es posible que haya indicado que le gustaría inscribirse para votar en la dirección en la que actualmente vive. Adjunto encontrará una solicitud de inscripción para votar. Una vez la haya completado, puede enviarla directamente a la Junta Estatal de Elecciones a la dirección proporcionada en la parte de posterior del formulario o puede devolverla a su oficina local de DSS del condado. Solamente los ciudadanos estadounidenses son elegibles para inscribirse para votar. Usted debe cumplir con todos los requisitos enumerados en la parte superior de la solicitud de inscripción para votar adjunta y en el bloque de la firma de la solicitud. Si usted no cumple con estos requisitos, no devuelva la solicitud. Si desea inscribirse para votar, por favor complete y firme la solicitud adjunta confirmando, bajo pena de perjurio, que cumple con los requisitos para votar y que la información en la solicitud es correcta. Por favor póngase en contacto con la Junta Estatal de Elecciones al 1-866-522-4723 si desea asistencia para completar la solicitud o si tiene preguntas relacionadas con este aviso. Si prefiere una copia de la solicitud de inscripción para votar adjunta en español, por favor visite https://www.ncsbe.gov/NVRA/01 o también puede llamar al 1-866-522-4723.

NCSBOE 2019.03

### **Exhibit C**

### Ohio

Ohio's Department of Job and Family Services online benefits application portal, stating the system can only be used by individuals with an Ohio driver's license or Ohio state ID card, and then provides additional options for accessing a voter registration application

# Voter Registration follow-up questions

Screenshot of the "would you like a mailed copy" question in the application flow.

Voter Registration		
If you are not registered to vote where you live now, would you like to apply to register to vote?	○Yes	○ No
IF YOU DO NOT CHECK EITHER BOX, YOU WILL BE CONSIDERED TO HAVE DECIDED NOT TO REGISTER TO VOTE AT THIS TIME.		
Your answer to the above question will not affect your application for benefits in any way.		
If you would like help in filling out the voter registration application form, we can help you. The decision whether to seek or accept help is yours. You may fill out the application form in private.		
Applying to register or declining to register to vote will not affect the amount of assistance that you will be provided by this agency.		
You can download a voter registration form by clicking here: <u>Voter Registration Form</u> , or you can register online.		
To register online, you will need to provide the following information:		
<ul> <li>Ohio driver's license or Ohio identification card</li> <li>Name</li> <li>Date of Birth</li> <li>Address</li> <li>Last four digits of your Social Security Number</li> </ul>		
Click here to register to vote online: Register to Vote.		
Would you like to receive a mailed copy of the Voter Registration and Information Update Form and Voter Registration Notice of Rights and Declination Form?	<ul><li>Yes</li></ul>	○No
You can review the Voter Registration Notice of Rights and Declination by clicking here: <u>Voter Registration Notice of Rights.</u>		
For help with this process or filling out the form, you may contact the toll-free Help Desk ( 1-844-640-OHIO()) or the Ohio Secretary of State's toll-free number (1-877-SOS-OHIO/1-877-767-6446). You may also call or visit your local county office.		

## **Exhibit D**

# Oklahoma

Checklist from Oklahoma Department of Human Services to guide staff when providing clients with voter registration assistance

#### **VOTER REGISTRATION APPLICATION CHECKLIST**

Use this checklist to review a filled out voter registration application. If items marked below with an asterisk (\*) appear to be missing, tell the applicant that the missing information may delay or prevent approval of the voter registration application. Accept the completed form and send it to the State Election Board whether or not the applicant adds the missing information. Election officials will determine whether the application is valid.

Section 1 – * Name Section 2 – * Birth Date		Verify that name is complete and legible.  A person's date of birth <u>must</u> be listed.
	_	Verify that the year listed is not the current year.
Section 3 – * Identification Number		<ul> <li>Verify that voter has provided one of the following:</li> <li>Oklahoma driver license number or state identification card number is required.</li> <li>Last four digits of the Social Security number is required if the voter does not have an Oklahoma driver license.</li> <li>Checkmark in the box only if the voter does not have an Oklahoma driver license or a Social Security number.</li> </ul>
Section 4 – Political Party		<ul> <li>See instructions on application for more information.</li> <li>Make sure <u>ONE</u> box is checked.</li> <li>Do <u>not</u> influence the person's choice.</li> </ul>
Section 5 – * Street address or directions to your home		<ul> <li>Complete street address, including</li> <li>number</li> <li>street name</li> <li>type (Street, Drive, Avenue, etc.)</li> <li>OR</li> <li>Legal description of homestead property</li> <li>Section-Township-Range</li> <li>OR</li> </ul>
		<ul> <li>a specific starting point. An intersection of highways or a known landmark is a good starting point. The name of a town is NOT a good starting point.</li> <li>exact mileage</li> <li>side of road</li> <li>See Section 5 instructions on application form for an example.</li> <li>OR</li> <li>A detailed map, including specific starting point, mileage, and side of road drawn in the area provided.</li> </ul>
		A Post Office Box number is not an acceptable address in Section 5. A Rural Route and Box number <u>may not be</u> an acceptable address in Section 5.
Section 6 - Mailing Address		* If a legal description, directions, or a map is given in Section 5, a
Section 7 – County of Residence Section 8 – Have you been registered to vote before? Section 9 – * Oath.		mailing address <b>must</b> be listed here.  Applicant has written county in which he/she resides.  If "yes," details about the former registration should be given.  See instructions on application form for more information.  The two questions printed above the Oath are answered.
	$\overline{\Box}$	* The application must be signed and dated

### **Exhibit E**

## Louisiana

Screenshot of the voter registration offer from the online portal used for Medicaid applications by the Louisiana Department of Health and Hospitals Rights at 1-800-368-1019, or writing to the LDH at PO Box 4818, Baton Rouge, Louisiana 70821.

ESTATE RECOVERY: You understand that Estate Recovery rules require the Department to recover the cost of certain health care assistance payments from your estate. These costs include the total amount of payments for facility services, waiver services, hospital care, and prescription drugs received at age 55 or older by Long Term Care and/or Home and Community Based Services recipients. The Department will not make a claim against the estate while you or your legal spouse is still living or if you have a dependent child who is under age 21, blind, or disabled. Collection may not be made if it is not cost effective for the Department to do so, or if your heirs apply for a hardship waiver after your death and the hardship waiver is granted by the Department. A hardship may exist if the estate property is the only source of income for the heirs, if that income is limited, or other extenuating circumstances.

#### **VOTER REGISTRATION OPTIONS**

If you are not registered to vote where you live now, would you like to register to vote here today?



Yes No

You may also apply to register to vote online at www.geauxvote.com. A valid Louisiana driver's license or ID card is required.

You may click here to print and mail the Mail Voter Registration Application.

A Mail Voter Registration Application will be mailed to you.

#### IF YOU DO NOT CHECK EITHER BOX YOU WILL BE CONSIDERED TO HAVE DECIDED NOT TO REGISTER TO VOTE AT THIS TIME.

Applying to register or declining to register to vote will not affect the amount of assistance that you will be provided by this agency.

If you would like help in filling out the voter registration application form, we will help you. You may call us toll-free at 1-888-342-6207. The decision whether to seek or accept help is yours. You may fill out the application form in private.

If you choose to register to vote at this time, the information about the location where you completed the application to register will remain confidential and will only be used for voter registration purposes. If you choose not to register to vote, that information will also be kept confidential.

If you believe that someone has interfered with your right to register or to decline to register to vote, your right to privacy in deciding whether to register or in applying to register to vote, or your right to choose your own political party or other political preference, you may file a complaint with:

Louisiana Secretary of State Commissioner of Elections P.O. Box 94125 Baton Rouge, LA 70804-9125 Phone: (toll-free) 1-800-883-2805

## **Exhibit F**

### **North Carolina**

Information sheet used by the North Carolina
Department of Health and Human Services when
discussing voter registration with clients during
Covered Transactions





NVRA INFORMATION SHEET

P.O. Box 27255 Raleigh, NC 27611-7255 Mailing Address elections.sboe@ncsbe.gov E-mail (919) 814-0700 or (866) 522-4723 Phone (919) 715-0135 Fax

1 NVRA Statement

Voter registration agencies are required to provide the opportunity to register to vote at the initial application for service or assistance and during recertification, renewal, or change of address. 52 U.S.C. § 20506(a)(6)(B) requires the information below be provided to you.

2 Voter Registration Question

If you are not registered to vote where you live now, would you like to apply to register to vote here today?

Please select one of the options below:

□YES

IF YOU DO NOT CHECK EITHER BOX, YOU WILL BE CONSIDERED TO HAVE DECIDED NOT TO REGISTER TO VOTE AT THIS TIME.

(Your selection will be recorded by the Caseworker in the NC FAST System)

3 Assistance

Applying to register or declining to register to vote will not affect the amount of assistance that you will be provided by this agency.

If you would like help in filling out the voter registration application form, we will help you. The decision whether to seek or accept help is yours. You may fill out the application form in private.

4 Your Rights

If you believe that someone has interfered with your right to register or to decline to register to vote, your right to privacy in deciding whether to register or in applying to register to vote, or your right to choose your own political party or other political preference, you may file a complaint with the NC State Board of Elections, P.O. Box 27255, Raleigh, NC 27611-7255 or you may call the agency at 1-866-522-4723.

### **Exhibit G**

### California

Example of a simple training guidance document that the California Secretary of State has provided to agency staff to ensure familiarity with required voter registrations services during Covered Transactions

#### BASICS FOR DESIGNATED VOTER REGISTRATION AGENCIES

The National Voter Registration Act (NVRA) is a federal law requiring designated agencies to provide "voter registration services." This handout provides general information and guidance about this law to agency staff.

#### Requirements

The NVRA requires agency staff to provide "voter registration services" every time a client:

- · Applies for benefits or services,
- Renews or recertifies benefits or services, or
- · Requests a change of address

What does "voter registration services" mean?

- Provide the Voter Preference Form. The Voter Preference Form asks clients if they would like to register to
  vote and makes clear that their benefits and services will not be affected by their answer. Completed Voter
  Preference Forms must remain on file in your office for two years.
- Provide the Voter Registration Card (VRC). Instructions for completing a VRC can be found on page 2.
- Help the client register to vote, unless the client declines to register. Provide the same level of assistance
  you would provide with your agency's own forms.
- Accept completed VRCs and forward them to the county elections office. VRCs are pre-addressed and postage paid and should be forwarded daily.

#### **Reminders**

- Offer voter registration for all required transactions whether they occur in person or by mail, phone, or online.
- For clients between the ages of 16 and 17, you may offer them a VRC to fill out in order to pre-register to vote.
- When the client is a minor (under 16), provide voter registration to the adult applying on behalf of the child.
- The federal Voting Rights Act requires election materials to be available in Spanish and English in all California counties. Check with your county elections office on additional languages that may be required.
- Do not screen applicants for eligibility to vote or discourage voter registration. County elections officials carefully verify eligibility before a voter is placed on the rolls.
- Encourage applicants to register, but do not, in any way, discuss or influence their political party preference.

#### Additional Information

- People with disabilities may initially decline to register to vote because they are unsure about how they
  may cast a ballot on Election Day. In California, each polling place has at least one accessible voting
  machine. Voters also have the option of voting by mail. Counties have remote accessible vote-by-mail
  (RAVBM) systems allowing voters with disabilities to receive their ballots at home and mark them
  independently and privately before sending them back to elections officials.
- People do not need to be able to read, write, or speak English in order to register to vote.
- People may not remember if they are registered to vote and can visit <u>www.voterstatus.sos.ca.gov</u> to check their status. When in doubt, a voter can re-register! There is no penalty for re-registering.

For additional information, please visit: http://www.sos.ca.gov/elections/voter-registration/nvra/training/.

### BASICS FOR COMPLETING VOTER REGISTRATION CARDS (VRCs)

**Item 1:** Voter declaration. The applicant must mark "yes" or "no" to the question of whether or not they are a United States citizen and if they will be 18 years old on or before Election Day. To pre-register to vote in California, the applicant must mark the box indicating that they are 16 or 17 years old and otherwise meet the eligibility requirements to vote.

Item 2: First name, middle name (or initial), last name, suffix (optional), and title (optional).

Should match CA driver license (CDL)/CA identification card (ID Card).

Item 3: Date of birth and CA driver license/ID card number or last four of Social Security Number.

- Date of birth and U.S. state or foreign country (not county) of birth.
- If the applicant has been issued a CA driver license or an identification card, they MUST list the number.
- If the applicant does not have either, they MUST list the last 4 digits of their Social Security Number.
- If the applicant does not have any of the above, they can still register to vote. Just leave the field blank.

Item 4: Home address, city, zip code, and county name. This should be their "Residential" address.

- Residence: Place in which the applicant's habitation is fixed and where the intention is to stay. For voting purposes, a person can have only ONE residence.
- P.O. Boxes & business addresses are NOT valid here.
- If the applicant does not have a street address, they should enter an exact description of where they live.
  - Cross streets, route, box, bridges, or other landmarks can be used.
    - Mostly used for applicants living in rural areas with non-specific street addresses. Also used for applicants who are homeless.

**Item 5:** Mailing address. The applicant must complete this section if they want to receive election mail at an address other than their residence. This can be a P.O. Box or business address.

**Item 6:** The applicant should complete this section if they were previously registered and changed their address, surname, or political party preference. If the applicant cannot recall their previous address, it can be left blank.

**Item 7:** To become a permanent vote-by-mail voter, the applicant must check the box marked "yes." This can be left blank if the applicant wants to vote at a polling location.

**Item 8:** Political party preference. Mark box to choose any of the political parties listed. If the applicant does not want to choose a political party preference, mark the "No Party/None" box.

• There can be only ONE mark in Item 8 with NO CORRECTIONS or ALTERATIONS. A new VRC must be filled out if an error is made.

#### Item 9: Optional Information

- E-mail address and phone number. These are optional but recommended.
- To receive state materials in another language, mark the language preference box. If no box is checked, voter materials will be provided in English.

**Item 10:** This item MUST contain the signature/mark/signature stamp of the applicant. Please also include the date of signing.

Blue Box: Complete this box if you filled out (put pen to paper) some or all of the VRC on behalf of the applicant. If you only answered questions or checked if the VRC was complete, do not complete the box.

## **Exhibit H**

# **Multiple States**

Several samples of tally sheets and reporting materials used by state voter registration agencies



### Arkansas Secretary of State

Voter Registration Site Monthly Reporting Form

Voter Registration P.O. Box 8111 Little Rock, Arkansas 72203-8111

### Elections Division

Voter Services 1-501-682-1686 1-800-247-3312

### Mark Martin, Secretary of State

Remember to put your <u>AGENCY CODE</u> on all Voter Registration Applications
Please send completed APPLICATIONS to Secretary of State DAILY. Retain all Declination Forms for 24 months. Send original of this form to the Secretary of State. You must retain the yellow copy for your records for 24 Months.

lgency:				_Agency Code: _	M	onth/Year:		
Address:								
	Street						Пş	
	XIP Code						County	
	Agency Consact			,			Fotophane Number	
Week 1	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Total
Date								
Sumber of VIII Applications								
Number of Sedimentons								
Week 2	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Total
Date								
Standor of Vit Applications								
Number of Profinctions								
Week 3	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Total
Date								
Number of VIII Applications								
Paradian of Profitor bons								
Week 4	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Total
Date								
Number of 10 Applications								
Herator of tectionshous								
Week 5	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Total
Date								
Number of VR Applications								
Product of Productions								
ine.				Number of VR	Applications Grand Total		Declination Grand Total	

### Agency Voter Registration Reporting (Form SEL 504)

Use this form to report NVRA numbers for your agency to the Oregon Secretary of State.

Agency name *
Agency city name *
Agency phone *
Agency NVRA ID# *
Must be between 1 and 3 Digits Currently Entered: 0 Digits.
Today's date *  6 / 14 / 2016  MM DD YYYY
Month reporting *
Number of voter registration cards mailed to county elections office *
Name of person submitting this report (SEL 504) *
First Last
Email *
Additional message (optional)
After you click "submit" you will receive a copy of this information sent to your email address.

Submit

<sup>\*</sup> Session cookie must be enabled on your browser to successfully submit this form.

	NUMBER OF REGIS	STRATIONS COMPLETED & SENT T	O COUNT	CLERK(	source: Vo	oter Reg	istration	Number	s Report	from SC	s)			
	County Director / ROM	Site Coordinator	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Jun-16	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16
			Regio	on 1										
	David Klumpenhower	Veronica Fank	27	12	16									
	Jocelyn Vigil	Cynthia Lozano	69	51	55									
	Elizabeth Jakeway	Stephanie Griffith	26	35	49									
	Lori Medina	Lori C Medina	30	25	31				-					
	Keven Woods	Susie Cotter	33	10	20									
	Elizabeth Garcia	Elizabeth Garcia	41	36	52									
	Elizabeth Garcia	Elizabeth Garcia	10	23	20									
	Michelle Jojola	Region 1 Total	236	192	243	0	0	0	0	0	0	0	0	0
T			Regio	on 2										
	Seth Conkle	Cindy Hall	10	9	10									
	Mary Rose Jimenez	Precilla Marquez	4	5	3									
	Mary Rose Jimenez	Precilla Marquez	9	13	17									
	Melanie Wright	Tanya Lewis	0	61	33									
	Seth Conkle	Diego Romero	18	35	38									
	Shanita Harrison	Maria E. Garcia	46	68	9									
	Lorrina Rivera	Lorrina Rivera	59	42	84									
	Emily Floyd	Laura Lovato	45	60	43									
201.0	Shanita Harrison	Region 2 Total	191	293	237	0	0	0	0	0	0	0	0	0
			Regio	on 3										
	Debbie Roybal	Cherie Iorio-McAbee	148	154	172									
	Elizabeth (Liz) Sandoval	Ana Casas	72	81	78									
	Marcia Montoya	Tamara Sanchez	74	52	75									
	Elizabeth (Libby) M. Sanchez	Rose Ortega-Garcia	66	89	85									
	Steven Garcia	Steven Garcia	29	33	47			J.						
	Victoria Hernandez	Region 3 Total	389	409	457	0	0	0	0	0	0	0	0	0
			Regi	on 4										
	Melissa Ervin	Melissa Ervin	54	49	64									
	Patsi Martinez	Jennifer L. Perez	26	30	21									
	Fertisha Hall	Melissa King	6	7	14									
	Jerry Barnes	Rebecca Caswell	18	20	29									
	Lois Greenway	Karen A. Edwards	8	25	26								- 1000	
	David Morales	David Morales	34	19	23									
	Patsi Martinez	Sandra Saiz	9	10	15									
	Van Horner	Region 4 Total	155	160	192	0	0	0	0	0	0	0	0	0
			Regi	on 5										
	Cherie Tucker	Freda E. Frietze	65	54	56									
	Farrah Lopez Gray	Greg Soriano	32	32	35									
	Otilio Montoya	Sally Galaz	66	42	52									
	Mark Shepherd	Lila Torres	23	28	33									
	Mark Shepherd	Mary A. Camacho	3	3	3									
	Isela Perez	Barbara Q. Escudero	15	5	1	32 Juli E								
	Rebecca Schuyler-Avila	Rebecca Schuyler-Avila	44	32	40									
	Cynthia Diaz	Region 5 Total	248 1,219	196 1,250	1,349	0	0	0	0	0	0	0	0	0
		STATEWIDE TOTAL	4 240	4 250	4 2 40	0	0	0	0				0	0

1,219

STATEWIDE TOTAL

1,250

1,349