



Indian Health Services Voter Registration Guide

Today, over a third (34 percent) of eligible Native Americans are not registered to vote.¹ The National Congress of American Indians (NCAI), the Native American Rights Fund (NARF), and Demos are delighted to work in partnership with Indian Health Services (IHS) to provide high quality voter registration services to eligible Native voters. IHS serves roughly 2.6 million American Indian and Alaska Native patients annually, presenting the most significant opportunity to expand meaningful registration opportunities to Native Americans.² And indeed, because civic engagement is a proven contributor to the social determinants of public health,³ voter registration services are well aligned with IHS' mission to increase the wellbeing of Native Americans. Thank you for your ongoing effort to meet the charge of President Biden's March 7, 2021, Executive Order Promoting Access to Voting ("Voting EO") instructing federal agencies, to the greatest extent practicable under existing law, to A. consider ways to expand citizens' opportunities to register to vote and to obtain information about, and participate in, the electoral process and B. agree to accept designation under the National Voter Registration Act.⁴

As a trusted agency providing critical medical services to American Indian and Alaska Native communities across Indian Country, IHS has an important role to play in decreasing barriers and facilitating civic participation among Native communities. Too often, Native Americans do not have registration opportunities – county registration sites are far away, Department of Motor Vehicles are located off reservation, and public assistance opportunities are provided through federal treaty obligations instead of state-run programs that offer registration.⁵ Consequently, the Indian Health Service provides the most meaningful opportunity to engage with and register the most under-served eligible Native American voters.

¹ National Conference of American Indians Infographic, https://www.ncai.org/initiatives/campaigns/NCAI_NativeVoteInfographic.pdf.

² "IHS Profile," Indian Health Service, data as of January 2020, <https://www.ihs.gov/newsroom/factsheets/ihsprofile/>.

³ Nelson C, Sloan J, Chandra A. *Examining Civic Engagement Links to Health: Findings from the Literature and Implications for a Culture of Health*. RAND Corporation, 2019. https://www.rand.org/pubs/research_reports/RR3163.html.

⁴ 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/>.

⁵ Dr. James Thomas Tucker, Jacqueline De León, and Dr. Dan McCool, *Obstacles at Every Turn: Barriers to Political Participation Faced by Native American Voters*, Native American Rights Fund, 2020, <https://vote.narf.org/obstacles-at-every-turn/>.

This document provides guidance on how to effectively conduct voter registration in the healthcare context. It was developed based on conversations with several organizations that have experience registering voters in healthcare settings and with individuals familiar with the IHS context. It was also informed by our many years of experience supporting staff in state agencies to design, implement, and conduct voter registration, including agencies that administer healthcare programs like Medicaid. This guidance includes recommendations related to:

- I. The opportunity to **leverage the expertise of nonprofit, nonpartisan partners** who have significant voter registration experience and that can support IHS during this initial development phase and on an ongoing basis after IHS has integrated voter registration into its patient services
- II. How to **effectively conduct voter registration** in the healthcare context
- III. Guidance on how to effectively and **successfully prepare IHS staff to provide voter registration services**
- IV. **Ideas for materials, messaging, branding** that can help IHS meet its goals related to effectively providing voter registration alongside its critical mission of providing high quality health care
- V. Working with state officials to formally **designate IHS facilities as voter registration agencies** under the NVRA.

We also created a document detailing general best practices for federal agencies overall, which may also be helpful.⁶

Our groups are eager to share our significant experience with voter registration and with effective engagement in American Indian and Alaska Native communities. We look forward to discussing these recommendations and supporting you as you implement your plan for assisting patients with voter registration at IHS facilities.

I. Leverage the Expertise of Nonprofit, Nonpartisan Partners

IHS does not need to start from scratch as it works to incorporate high quality voter registration services into its facilities. There are nonprofit, nonpartisan organizations both within Indian Country and outside it with significant experience developing voter registration programs in healthcare and other similar contexts. Many of these organizations are eager and happy to provide technical assistance and thought partnership. There are also opportunities to leverage trusted actors within Native communities who could be strong partners to IHS facility leadership and staff in implementing voter registration services that will meet the needs of IHS' patients, such as members of the pilot Native Health Coaches program.

Working with third parties such as these has many benefits. Most fundamentally, trusted third parties can provide additional guidance that can help ensure voter registration services are high quality, even in places where IHS staff capacity is limited. Additionally, partnerships with these

⁶ Best Practices for Federal Agency Voter Registration, Demos & ACLU, 2021, <https://www.demos.org/policy-briefs/best-practices-federal-agency-voter-registration>.

groups can help IHS build trust with patients in this new area of services. Similar to the trust IHS enjoys in its provision of medical care, these third parties are often members of IHS patients' communities and have built familiarity with and trust in the work they do to improve access to registration and voting. These groups can help raise awareness about and generate trust in IHS voter registration services. Finally, these third parties are often well-situated to share expertise on how to provide adequate and culturally appropriate language assistance in the voter registration process.

Nonprofit, Nonpartisan Voter Engagement Organizations

There are a number of nonprofit, nonpartisan organizations in Indian Country who would be excellent partners in offering experience and expertise to IHS staff as they work to integrate high quality voter registration services. These organizations have significant experience conducting nonpartisan voter registration and have staff who are already trained in the essentials, such as: respectfully approaching patients to offer voter registration, protecting registrant confidentiality, ensuring the interaction remains nonpartisan, complying with their state's third-party registration requirements, and collecting and transmitting completed voter registration applications to appropriate local or state election officials.

These organizations include the NCAI Native Vote coalition, InterTribal Council of Arizona, the Native American Voting Rights Coalition (NAVRC) and its members, California Native Vote Project, NDN Collective, Western Native Vote (Montana/Idaho), Four Directions, Advanced Native Political Leadership, Phoenix Indian Center, National Urban Indian Family Coalition, Alaska Native Vote, Great Plains Tribal Chairmen's Association, and individual citizens engaged in strengthening civic participation in AIAN communities and numerous partner organizations. **The Native American Voting Rights Coalition is continuing to update their lists of state and regional partners in GOTV and are willing to provide contact information.**

National Health Coaches (Pilot Program)

In addition to these existing potential partners—and any others local IHS leadership may be able to identify—IHS should consider integrating a voter registration component into the National Health Coach Pilot Project it is launching this year.⁷ Experience with a similar program in the VA context shows that these coaches become integral members of a healthcare facility community and are excellent ambassadors for an activity that is essential to the health and wellness of Native communities: voting. These highly trained and trusted actors will already be operating within some IHS facilities to support patients to live healthy lives, and they would be excellent candidates for checking on a patient's voter registration status and, if desired, supporting patients to register to vote, to update their registration, or to access voter education materials.

Even in IHS facilities where the Native Health Coaches program is not being piloted, there may already be analogous actors who are integrated into the healthcare experience, who could offer voter registration services or support.

⁷ National Health Coach Pilot Project, Indian Health Services, <https://www.ihs.gov/dccs/nhcopp/>. The pilot phase's first 50 participants are being trained between April – October 2022, so there is still time to integrate a simple voter registration component into their training. Our organizations support training of staff doing voter registration in other contexts and can provide sample training materials.

II. Effectively Conducting Voter Registration in the Healthcare Context

Years of experience registering eligible voters in private healthcare contexts and at state agencies providing other services make clear it is straightforward, cost-effective, and impactful to offer community members voter registration services alongside the medical care or other business they are conducting. State agencies like departments of motor vehicles, Medicaid and SNAP offices, and offices serving people with disabilities have been registering voters for decades without burden on staff or disruption of client services. In the state of Michigan, voter registration activities conducted by Michigan the Department of Human Services **averaged just \$7,000 per site per year** in 2019 and 2020.⁸ Most importantly, when agencies provide high-quality voter registration services, millions of additional people are added to the registration rolls.⁹

Acquiring Voter Registration Forms

As a starting place, IHS staff should ensure there are adequate voter registration forms at the facility. The process for securing voter registration forms varies state by state, so staff should consult with local or state election officials, some of whom will likely be willing to provide blank registration forms directly to IHS facilities. In many states, IHS staff can simply print voter registration forms from the Secretary of State's or local election official's websites to keep forms well-stocked at the facility. Where state forms are required to be obtained by local or state election officials, we are happy to advise on the process if needed.

Offering Voter Registration

Exactly when and how IHS staff offer voter registration will depend on a few factors, including the nature of the intake process, the layout of the facility, and the connectivity of the facility. The following are general best practices that will be possible in many facilities; we are happy to discuss specific circumstances and provide site-relevant recommendations directly to IHS facilities if they determine how to integrate voter registration.

Generally, the intake or check in process is an excellent place to offer patients the chance to register to vote. Patients can be asked whether they are registered to vote at their current address, and if not if they want to register to vote—the “voter registration question”—as part of the intake process. If the intake process happens in person at the IHS facility, the staff member conducting this intake can ask the voter registration question after collecting the other relevant information. If the patient is interested, staff can then provide a voter registration form and offer to provide assistance filling out the form, if the patient desires it. If the facility needs to move patients through intake quickly, this staff person could also send the patient to a separate designated staff member for help filling out the form and move on to intake for the next patient.

If intake happens over the phone before the visit, the IHS staff person making the call can ask the voter registration question and let the patient know someone will be available to offer assistance filling out the voter registration form when they come in for their appointment. If patients complete the intake process online before their visit, there can be a question about voter registration and a

⁸ Michigan DHHS administers SNAP, Medicaid/CHIP programs. Data obtained via public records requests.

⁹ Laura Williamson, Pamela Cataldo, and Brenda Wright, *Toward a More Representative Electorate*, Dēmos, December 21, 2018, 6. <https://www.demos.org/research/toward-more-representative-electorate>.

note that someone will be available to offer assistance filling out the voter registration form when they come in for their appointment. Most states also offer online voter registration, so in cases where IHS facilities are situated in communities with broadband access and utilizes an online intake form, that form can also link directly to the state's online voter registrations system.¹⁰

For existing patients, a similar process can be utilized during the check in process. As the IHS staff member checks to ensure the patient's insurance is up to date, they can also ask if they have moved, changed their name, or otherwise may need to update their voter registration, or if they're not registered to vote already, if they want to register for the first time. If the patient desires to register or to update their registration, the IHS staff member can follow the procedures described above.

Alongside integrating voter registration into the intake or check in processes, in a circumstance where the medical staff at an IHS facility is comfortable, the topic of voting and voter registration could also be integrated into the interaction between the patient and the healthcare provider. For example, Vote-ER, an organization that supports healthcare providers and facilities to integrate voter registration and education into their services,¹¹ suggests asking a question about voter registration alongside routine health evaluation questions like "Do you smoke?," "Do you drink?," "Are you safe at home?," "Are you registered to vote?," or after completion of the medical history, through a question like "We're all done with this part of our history. Now I want to transition to something else that's also important to your health and wellbeing, and that's voting. Are you registered to vote?" Such conversations help patients draw connections between voting and their health and wellness (and that of their community) and engage a trusted messenger in helping to normalize voting. For any patients who are interested, the medical provider could then direct the patient to check in with intake staff to learn about how to register to vote on their way out of the appointment.

Ensuring Completed Voter Registration Forms are Submitted to Election Officials

Ideally, any time a patient completes a voter registration form, IHS staff would collect that completed form and transmit it to the appropriate state or local election officials in a timely fashion.¹² In this case, completed voter registration forms should be stored in a secure location until they are transmitted by a designated and trained staff member, either by mail or in person. Agencies that collect and transmit completed voter registration forms see higher registration rates, because when clients or patients take voter registration applications home to complete later or to mail on their own, they often face barriers to completing the process and do not become registered.

For facilities where transmission of completed forms may be logistically impossible, IHS can still take steps to help ensure the patient becomes registered. For example, election officials in some localities and states may be willing to collect completed forms from the IHS facility, in which case IHS staff would only be responsible for collecting and securely storing the forms, and for notifying election officials if a pickup is required outside the regularly scheduled pickups.

¹⁰ "Online Voter Registration," National Conference of State Legislatures, last updated July 2021, <https://www.ncsl.org/research/elections-and-campaigns/electronic-or-online-voter-registration.aspx>.

¹¹ Vot-ER, <https://vot-er.org/>.

¹² The NVRA is again a good model for this. It requires agencies to transmit completed voter registration applications to the appropriate election official within 10 days after the client completes the application (and within 5 days before the voter registration deadline for federal elections).

If election officials are not willing or are unable to pick up completed forms, IHS staff can provide patients with an addressed, stamped envelope they can use to mail their completed form, and can direct patients to the closest USPS mailbox.¹³ In some states, such as New Mexico, voter registration forms make clear that postage is not required; patients, or IHS staff who collect the completed form need, simply seal the voter registration form and drop it in a USPS mailbox.¹⁴

In cases in which IHS staff do not collect completed forms, it is extra important that the staff member remind patients to mail in their completed forms and make clear any upcoming voter registration deadlines. IHS staff could even do a follow up call to remind patients to submit their voter registration applications.

III. Successfully Prepare IHS Staff to Provide Voter Registration Services

All IHS staff engaged in any step in the voter registration process should complete an initial training upon beginning in their role, and they should receive refresher training each year. Training should be developed with the support of voter registration experts and organization(s) with experience and expertise in community and civic engagement with Native American communities. **Our organizations are eager to serve as a resource to IHS headquarters and to any individual facilities that are developing staff training.**

Trainings for staff engaged in voter registration with patients should at a minimum include:¹⁵

- At a conceptual level, the link between physical and mental health and civic engagement, especially voting;¹⁶ the importance of ensuring all eligible people have access to registration and voting; the significant and persistent registration gaps faced by American Indian and Alaska Native communities;¹⁷ and the role IHS can play in removing barriers to democratic participation.
- General information about who is eligible to register to vote in the state, including that an individual must be a U.S. citizen to vote.¹⁸
 - Note that IHS staff themselves are not responsible for determining eligibility nor

¹³ The National Mail Voter Registration Form (NMVRF) provides an address for delivery of completed voter registration forms in almost all states. *National Mail Voter Registration Form*, U.S. ELECTION ASSISTANCE COMM'N, <https://www.eac.gov/voters/national-mail-voter-registration-form>; see also 52 U.S.C. § 20505(a).

¹⁴ For example, see New Mexico's voter registration form, <https://portal.sos.state.nm.us/ovr/VRForms/VRFormEnglishFinal.pdf>, and Georgia's voter registration form, https://sos.ga.gov/sites/default/files/forms/GA_VR_APP_2019.pdf.

¹⁵ We can provide samples of voter registration training for agency staff from state government agencies, and/or can work with IHS facility leadership to develop training specific to IHS staff needs.

¹⁶ Susan H. Babey, Joelle Wolstein, and Shana Charles, *Better Health, Greater Social Cohesion Linked to Voting*, <https://healthpolicy.ucla.edu/publications/search/pages/detail.aspx?PubID=1963>.

¹⁷ Report of the Interagency Steering Group on Native American Voting Rights, March 2022, page 9, <https://www.whitehouse.gov/wp-content/uploads/2022/03/Tribal-Voting-Report-FINAL.pdf>.

¹⁸ The National Mail Voter Registration Form and state voter registration applications describe the eligibility requirements to register to vote. See footnote 13 for more detail on the NMVRF.

liable if an ineligible person registers to vote. Election officials themselves are responsible for reviewing voter registration applications and verifying eligibility.

- How to ask a question about voter registration in the healthcare context, i.e. when patients are focused on the purpose of their health appointment.
- The specific processes an IHS facility has developed for:
 - Asking the voter registration question;
 - Distributing voter registration applications to interested patients;
 - Offering assistance in completing the application to interested patients;
 - Collecting and storing completed applications, as applicable; and
 - Transmitting it to elections officials, as applicable.
- Description of the fields in the voter registration application, including which fields are required for the registration to be complete and accepted, and what information should be supplied for each required field.
- Answers to commonly asked questions about filling out the voter registration application and about voting.
- Information on how clients can contact state or local election officials if they have additional questions about voter registration or voting.¹⁹
- How to ensure that the voter registration application is completely filled out and legible, before accepting and transmitting the application to the appropriate election official (as applicable) or sending the patient with an addressed, stamped envelope.
- The importance of making clear to patients that voter registration is voluntary—they are not required to register to vote to obtain services.
- The strict prohibition on partisanship and the strict rules around confidentiality.

Voter Registration Coordinator

One of the primary ways to ensure effective voter registration at IHS facilities is to appoint a “voter registration coordinator” within each facility, whose responsibility it is to ensure high quality voter registration services are provided to all eligible patients. This need not be a full-time position; voter registration oversight can likely be added to the duties of a staff member who is already playing a supervisory or oversight role within an IHS facility. Having an appointed voter registration coordinator can make the difference between effective voter registration efforts—i.e. registration that is convenient, efficient for the facility, and simple for patients to navigate and, as a result, maximizes the number of Native American voters added to the registration rolls—and ineffective efforts. This is a model employed by many state agencies to meet their obligations under the National Voter Registration Act.²⁰

¹⁹ Contact information is maintained by the General Services Agency on USA.gov, <https://www.usa.gov/election-office>.

²⁰ For example, Arizona, Kansas, North Carolina, and Oklahoma, to list a few.

The voter registration coordinator should have additional training, beyond the annual training for other staff involved in offering voter registration services, and their duties should include:

- Ensuring adequate training for all agency staff engaged in providing voter registration services, via an initial training at the point of hire and an annual refresher training like that described above.
- Being responsible for maintaining voter registration supplies (such as blank voter registration applications).
- Ensuring voter registration services are being offered during relevant transactions and providing quality control of those services.
- Setting up and monitoring a system for delivering completed applications to election officials, as applicable.
- Collecting and making publicly available data on the number of people submitting registration applications through the program or agency.

IV. Ideas for Materials, Messaging, and Branding

It is important to think through the type of messaging and materials that will resonate with different audiences related to voter engagement. Often, when and how something is said is just as important as what is said. Possibilities may include: Messages on GoodHealthTV encouraging people to take advantage of voter registration opportunities in IHS facilities, and/or informational sheets that can be supplied in waiting rooms explaining how clients can access voter registration. Additionally, voters in Native American communities tend to respond to messages delivered by trusted messengers in the community and relate to topics that directly affect their families and community. Our groups stand ready to help IHS develop culturally competent messaging that resonates with Native voters.

V. Designate IHS Facilities as NVRA Voter Registration Agencies

The National Voter Registration Act of 1993 (NVRA) provides that states can designate federal government agencies as voter registration agencies.²¹ The Voting Access EO requires that “[e]ach agency, if requested by a State to be designated as a voter registration agency pursuant to section 7(a)(3)(B)(ii) of the National Voter Registration Act, shall, to the greatest extent practicable and consistent with applicable law, agree to such designation.”²²

Designation is not necessary for IHS to provide the more robust voter registration services recommended here. However, thanks to the strong voter registration procedures in the NVRA, accepting designations made by a state can help IHS follow through on its commitment in response

²¹ National Voter Registration Act, §7(a)(3)(B)(ii).

²² “Executive Order on Promoting Access to Voting,” Section (4)(b), March 7, 2021, <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/03/07/executive-order-on-promoting-access-to-voting/>.

to the Voting EO, to “offer its patients assistance with voter registration”²³ and, in turn, promote better individual and community health in Indian Country. Accepting designation can also facilitate interactions with the state by providing a registration model states are familiar with, making the process of receiving and returning registration material easier and smoother.

The Department of the Interior has led on securing designations of important institutions in Indian Country. It has designated Haskell Indian Nations University in Kansas and is in the process of designating the Southwestern Indian Polytechnic Institute (SIPI) in New Mexico. Other agencies, like the Department of Veterans Affairs and the Small Business Administration, are also pursuing NVRA designation in a handful of places.²⁴

IHS, too, could pursue NVRA agency status by starting with a handful of pilot designations in IHS facilities that are high-functioning and serve sizeable populations within Indian Country. One facility we believe is a great candidate for designation is the Albuquerque, NM IHS facility. Albuquerque Area IHS delivers services to more than 86,000 Native Americans through a system of four hospitals, 12 health centers, six health stations, two urban Indian programs, one dental center, and one regional residential treatment center. As a trusted provider of critical health care services in Albuquerque and the region, the Albuquerque Area IHS is well-situated to provide impactful voter registration services for Native American communities. Further, because of DOI’s work toward securing designation of SIPI in New Mexico, leadership in the state is already familiar with NVRA designation.

A few other good candidates include the Pima County, AZ facility, where we believe there is an eager partner in the County Recorder, as well as the Shurz, Red Lake, and Bimidji facilities, and the Reno Sparks and Denver facilities. By starting with a small number of promising locations in both rural and urban areas, IHS can learn how to become an effective NVRA voter registration agency and, in time, scale up to serve even more of Indian Country through a broader set of IHS facilities.

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The trusted relationship that IHS has established with Native communities provides a strong foundation for offering voter registration services alongside existing IHS interactions. Civic engagement is a proven contributor to the social determinants of public health,²⁵ and as such is a strong potential multiplier of IHS’s mission of promoting the health of Native communities. Advocates for AIAN communities stand ready to partner with IHS to achieve the promise of President Biden’s Executive Order for their communities.

²³ “Fact Sheet: Biden Administration Promotes Voter Participation with New Agency Steps,” White House, September 28, 2021, <https://www.whitehouse.gov/briefing-room/statements-releases/2021/09/28/fact-sheet-biden-administration-promotes-voter-participation-with-new-agency-steps/>.

²⁴ “Fact Sheet: Biden-Harris Administration Releases Report on Native American Voting Rights,” White House, March 24, 2022, <https://www.whitehouse.gov/briefing-room/statements-releases/2022/03/24/fact-sheet-biden-harris-administration-releases-report-on-native-american-voting-rights/>.

²⁵ Nelson C, Sloan J, Chandra A. *Examining Civic Engagement Links to Health: Findings from the Literature and Implications for a Culture of Health*. RAND Corporation, 2019. https://www.rand.org/pubs/research_reports/RR3163.html.