IMPACT OF PROPOSED PROOF OF U.S. CITIZENSHIP AND VOTER ID REQUIREMENTS ON MICHIGAN VOTERS

A ballot initiative sponsored by Americans for Citizen Voting (ACV) contains sweeping election proposals that would erect new barriers to the ballot for Michigan voters of all backgrounds and impose significant administrative burdens on state and county elections officials.[1] The harmful restrictions proposed under the initiative are stricter voter identification requirements and new requirements for proof of U.S. citizenship.

The ACV initiative would create cumbersome processes for verifying U.S. citizenship that would likely require all voters to provide documentary proof of citizenship (DPOC) in person[2] to state or local government officials, as well as require voter ID in all instances—even though substantial percentages of Michigan voters lack a driver's license or similar photo ID. Under the ACV initiative, only a short list of documents would qualify as proof of citizenship, including a birth certificate, a U.S. passport, and certificates of citizenship or naturalization. All of these requirements would place significant financial burdens on voters and on elections officials. In addition, they are likely to upend popular methods of voter registration, including registration by mail, community voter registration drives, and online voter registration.

Recent survey data show that large numbers of voting-age citizens lack a current driver's license or similar photo ID, with disproportionately high numbers for people of color, as well as younger, less-educated, lower-income, and disabled citizens.

The ACV Initiative would undo clear language in the Michigan Constitution that allows voters who are unable to show a photo ID at the polls to sign an affidavit and have their vote counted.[3] A 2024 report published by the Center for Democracy and Civic Engagement at the University of Maryland makes clear that there are significant barriers to accessing voter ID, as well as gaps in knowledge about voter ID requirements, that would impact hundreds of thousands of Michigan citizens.[4] For instance, just under nine percent of adult citizens nationwide do not have a current driver's license; another 12 percent have a license that is unexpired but does not include both their current address and current name.[5] Applying these percentages to Michigan, this would mean that out of the state's approximately 7.6 million voting-age citizens,[6] **nearly 700,000 would lack a current driver's license, and over 900,000 more would have a license with a mismatched address or an incorrect name.**

National survey data also show significant disparities in driver's license possession by race, age, education, income, and disability status.[7] For instance, **while only five percent of white adult citizens lack a current license, the percentages for people of color are more than two to three times higher: 18 percent for Black adult citizens, 15 percent for Latino adult citizens, and 13 percent for Asian and Pacific Islander adult citizens.**[8] Disparities by age are even more stark: 41 percent of adult citizens ages 18-24 lack a license with a current address or name, compared to 13 percent of those ages 50-64 and 11 percent of those 65 or older.[9] **Nearly half of Black citizens ages 18-29 do not have a license with a current address or name, and 30 percent do not have a license at all. And 20 percent of disabled adult citizens do not have a license, compared to just six percent of non-disabled adult citizens.**[10]

Nearly 1-in-10 voters lack or cannot readily access documentary proof of U.S. citizenship.

Nine percent of voting-eligible citizens in the U.S. (over 22 million people) lack or cannot easily access documentary proof of citizenship, such as a birth certificate, a U.S. passport, a certificate of naturalization, or a certificate of citizenship, according to a 2025 report published by the University of Maryland's Center for Democracy and Civic Engagement.[11] Nearly two percent of Americans eligible to vote (over 3.8 million people) lack any form of documentary proof of citizenship. And there are disparities along racial and ethnic lines: **Eleven percent of people of color**, compared to only eight percent of white people, lack or cannot easily access documentary proof of citizenship.[12]

Assuming Michigan has comparable percentages, this would mean that out of the state's approximately 7.6 million voting-eligible citizens, **nearly 700,000 Michigan citizens do not have, or do not have access to, documentary proof of citizenship.** It would also mean that **over 180,000 people of color lack or cannot easily access documentary proof of citizenship.**[13]

Obtaining or replacing documentary proof of U.S. citizenship can cost hundreds of dollars, with processing times of up to six months or more.

For many Michigan residents, obtaining documentary proof of citizenship can be an expensive and lengthy process. Michigan-born citizens who seek to apply in person for a birth certificate through the Michigan Vital Records Department must schedule an appointment, and appointments are available only two days out of the week and for only four hours per day.[14] Those requesting a birth record by mail must normally wait four to five weeks,[15] while online applicants must apply through a commercial service, which can take 21 to 45 business days to process.[16]

The greatest burdens will be on naturalized and derivative citizens, for whom the process of obtaining proof of U.S. citizenship is both longer and more costly. As documented in the table below, f**or Michigan citizens who were naturalized or who derived their citizenship from their parents, obtaining or replacing proof of citizenship can cost from over $500 to nearly $1,400** and take **up to six months**. Citizens who have changed their names would likely bear extra costs and processing wait times for documents aligning their name change with proof of citizenship.

Government documents proving U.S. citizenship and their costs and processing times

As of September, 2025

U.S. citizenship document	Type of U.S. citizen	Fees	Processing time
Michigan Birth Certificate[17]	U.S.-born	**In-person or mail**: $34 (Michigan Vital Records Department) **Online:** $48 standard delivery; $84 expedited delivery (County-specific costs vary.)	**In-person**: As fast as same day (appointment may be required) **Mail**: 4-5 weeks **Online**: 21-45 business days, standard delivery; 1-5 business days, expedited delivery
Out-of-State Birth Certificate	U.S.-born	Varies	Varies
Consular Report of Birth Abroad (CRBA)[18]	Born abroad to U.S.-citizen parents	$50	4-8 weeks 14-16 weeks if original CRBA issued before Nov. 1, 1990
U.S. Passport[19]	Any U.S. citizen	$165 (application + acceptance fee for age 16 or older; additional $60 for expedited service)	4-6 weeks (standard delivery) 2-3 weeks (expedited service)
Replacement Certificate of Naturalization[20]	Naturalized U.S. Citizencitizen	$505 online $555 paper	5-1/2 or more months
Certificate of Citizenship[21]	Born abroad to U.S. citizen or derived U.S. citizen (granted to minors with a naturalized U.S. citizen parent)	$1335 online $1385 paper	3-6 months

The high costs and extended processing times associated with obtaining documentary proof of citizenship could prevent voting-eligible citizens throughout Michigan from registering to vote in the next election cycle. And the lengthy waiting periods are especially consequential, given that Michigan's voter registration deadline is 15 days before an election.

Hundreds of thousands of Michigan residents living in poverty, many of whom reside in rural counties, would face even more serious burdens based on their lower incomes and reduced access to governmental resources.

In Michigan, 8.8 percent of families lived in poverty in 2023. [22] **Poverty rates in the state's rural counties are typically 50-80 percent higher**. At 15.8 percent, Clare County's poverty rate is nearly double the state average. Poverty rates in other rural counties are comparable: Isabella County (14.1 percent), Lake County

(13.7 percent), Montmorency County (12.4 percent).[23] The high costs of obtaining documents from the federal government to prove naturalized or derivative citizenship could be insurmountable for many low-income voters in Michigan.

Hardship programs to subsidize proof of U.S. citizenship requirements for low-income Michigan voters could cost hundreds of thousands of taxpayer dollars.

The ACV initiative would attempt to alleviate financial burdens on low-income Michigan voters by creating a hardship program that would underwrite the costs of Documentary Proof of Citizenship (DPOC) for qualifying citizens. While well intended, the initiative offers no guidance to state and local governments on how to implement a hardship program. Nor does the ACV initiative guarantee government funding for the program. At the same time, the hardship program has no clear ceiling on costs, and the program could require the government to spend hundreds of thousands of dollars to fulfill DPOC requirements for financially burdened Michigan voters. These costs would be especially high for naturalized and derivative citizens, for whom costs of federal DPOC can be over $1,000 per person.

Registering to vote and casting a ballot could be more onerous and obstacle ridden for millions of Michigan citizens.

In practice, DPOC requirements could mandate a burdensome process that would require voters to show proof of citizenship in person to the Michigan secretary of state's office or local elections officials before they can cast a regular ballot. Voters unable to prove their citizenship prior to an election would have to vote by provisional ballot and then take additional steps to ensure their vote is counted. Even voters who submit proof of citizenship in a timely manner could face administrative delays during the verification process, which could prevent them from casting a regular ballot. These obstacles would raise the risk of mass disenfranchisement by significantly decreasing the ease and reliability of popular methods of voter registration, including online voter registration and community-based voter registration drives. Over time, these disadvantages may cause Michiganders to stop using most methods of voter registration altogether.

Eighteen percent of Michigan voters—or nearly 1.1 million people—were registered to vote through methods that could be disrupted by DPOC, according to our analysis of 2024 census data.[24] This number may be an underestimate because the impact of DPOC on some methods of registration is less clear. DPOC's barriers to voting would affect not just prospective voter registration applicants but also any currently registered voters who may need to update their voter registration in the future.

Potential Effects of Documentary Proof of Citizenship (DPOC) on Voter Registration Methods in Michigan

% of Michigan voters using a voter registration method …

	Likely affected by DPOC	Less likely to be affected by DPOC	Unknown voter reg. method
State of Michigan	18% *(nearly 1.1 million voters)*	67% *(over 4.0 million voters)*	15% *(over 920,000 voters)*

Source: November 2024 Voting & Registration Supplement to the U.S. Census Bureau's Current Population Survey (CPS).
Note: The survey asks how a person registered to vote: Department of Motor Vehicles, public assistance agency; mailed form to election office; internet or online; school, hospital, or campus; county or government office; registration drive; polls on election day; another place/way; and don't know or refused to answer.

For this analysis, we assume proof of citizenship that would require in-person presentation and verification would most impact the following methods of registration: mailed form to election office; internet or online; school, hospital, or campus; and registration drives. However, note that the ballot initiative could also impact registrations at public assistance agencies, though we assume this to be less likely because of the potential for data sharing between government agencies.

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Naturalized and derivative citizens would be particularly at risk of disenfranchisement.

Naturalized and derivative citizens would be at particular risk of disenfranchisement under any DPOC requirement. The ACV initiative requires the Michigan secretary of state to regularly review state records, such as the Department of Motor Vehicles (DMV) database, and to flag any potential noncitizens on the voter rolls. Anyone identified as a noncitizen in this manner would be permitted to vote only by provisional ballot and be required to show proof of U.S. citizenship within six days of voting. Worse still, the ACV initiative would require the secretary of state to remove individuals who cannot meet DPOC requirements from voter registration rolls. In addition, elections officials could face a $1,000 fine and/or up to five years imprisonment for registering a voter who cannot satisfy the DPOC requirement.

Verification of citizenship would rely heavily on motor vehicle records and other government databases. This strategy faces a major hurdle: State agencies do not maintain up-to-date information about citizenship status.[25] Therefore, naturalized and derivative citizens will inevitably end up in the crosshairs of a citizenship verification process that relies on outdated motor vehicle records. This creates a major risk for disenfranchisement. For example, a naturalized citizen who was a lawful permanent resident at the time they obtained a driver's license will likely continue to appear as a noncitizen in Michigan's DMV database until they renew their driver's license. Similarly, a teenage driver who obtains derivative citizenship through parental naturalization would continue to appear as a noncitizen, even after they turn 18 and become eligible to vote. DPOC could require elections officials to also cross-check data against information contained in the federal Systemic Alien Verification for Entitlements (SAVE) system. However, SAVE has been criticized as an unreliable means for verifying voter eligibility.[26]

Local elections officials in Michigan would have to undertake unnecessary and excessive administrative burdens as part of an unfunded mandate.

Michigan's elections system is highly decentralized, with multiple layers of administration at the state, county, city, and township levels.[27] DPOC requirements would overload local elections officials by requiring them to implement a tedious and unnecessary process for verifying U.S. citizenship, without providing additional funding to carry out these mandates. Election officials would have to absorb direct costs associated with the citizenship verification process, such as the costs of mailing mandatory notices to voter registration applicants. Beyond financial burdens, any DPOC initiative would also pile more training and hiring needs upon local election offices that are already straining under the weight of growing administrative demands.[28] By imposing unnecessary administrative tasks on overworked elections officials, DPOC only exacerbates election workforce issues and diverts limited resources away from critical functions of election administration.

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[1] Initiative Petition Amendment to the Constitution, Americans for Citizen Voting – Michigan (July 11, 2025), https://www.michigan.gov/sos/-/media/Project/Websites/sos/BSC-Announcements/AmericansForCitizensVoting-v2483a-Final.pdf

[2] The ACV initiative fails to specify whether voters must provide proof of citizenship in person. In most instances, we assume that in-person proof of citizenship would be required by the secretary of state's office, although alternative channels could be established.

[3] Under Proposal 2, the voters in 2022 approved constitutional amendments that, among other things, established a right to prove voting eligibility by affidavit.

[4] Jillian Andres Rothschild, Samuel B. Novey, and Michael J. Hanmer, *Who Lacks ID in America Today? An Exploration of Voter ID Access, Barriers, and Knowledge*, Center for Democracy and Civic Engagement (January 2024), https://cdce.umd.edu/sites/cdce.umd.edu/files/pubs/Voter%20ID%202023%20survey%20Key%20Results%20Jan%202024%20%281%29.pdf

[5] Redistricting & Voting Rights Data Office, U.S. Census, *Citizen Voting Age Population by Race and Ethnicity* (January 30, 2025), https://www.census.gov/programs-surveys/decennial-census/about/voting-rights/cvap.html

[6] Ibid.

[7] Jillian Andres Rothschild, Samuel B. Novey, and Michael J. Hanmer, op. cit.

[8] Ibid., p. 3

[9] Ibid.

[10] Ibid.

[11] Jillian Andres Rothschild, Samuel B. Novey, and Michael J. Hanmer, *Who Lacks Documentary Proof of Citizenship?* Center for Democracy and Civic Engagement (March 2025), https://cdce.umd.edu/sites/cdce.umd.edu/files/Who%20Lacks%20Documentary%20Proof%20of%20Citizenship%20March%202025.pdf

[12] Ibid., p. 4

[13] Redistricting & Voting Rights Data Office, U.S. Census, op. cit.

[14] https://www.michigan.gov/mdhhs/doing-business/vitalrecords

[15] https://www.michigan.gov/mdhhs/doing-business/vitalrecords/order-by-mail

[16] https://www.michigan.gov/en/mdhhs/doing-business/vitalrecords/order-a-record-online

[17] https://www.michigan.gov/mdhhs/doing-business/vitalrecords

[18] U.S. Department of State. *How to Replace or Amend a Consular Report of Birth Abroad (CRBA)*, https://travel.state.gov/content/travel/en/replace-certify-docs/requesting-a-record/replace-amend-CRBA.html

[19] U.S. Department of State, *U.S. Passports and Real ID*, https://travel.state.gov/content/travel/en/passports.html

[20] " U.S. Citizenship and Immigration Services, *N-565, Application for Replacement Naturalization/Citizenship Document*, https://www.uscis.gov/n-565

[21] U.S. Citizenship and Immigration Services, *N-600, Application for Certificate of Citizenship*, https://www.uscis.gov/n-600.

[22] National Institute on Minority Health and Health Disparities, *HDPulse: An Ecosystem of Minority Health and Health Disparities Resources*, accessed September 26, 2025, https://hdpulse.nimhd.nih.gov

[23] Ibid. (Poverty for Michigan by County), https://hdpulse.nimhd.nih.gov/data-portal/social/map?age=001&age_options=age25_1&demo=00007&demo_options=education_3&race=00&race_options=race_7&sex=0&sex_options=sexboth_1&socialtopic=080&socialtopic_options=social_6&statefips=26&statefips_options=area_states

[24] U.S. Census Bureau, *Current Population Survey Voting and Registration Supplement Public Use Microdata Sample*, (November 2024), accessed September 26, 2025, https://www.census.gov/data/datasets/time-series/demo/cps/cps-supp_cps-repwgt/cps-voting.html

[25] Michael Morse, Rachel Orey, and Joann Bautista, *Modernizing Voter List Maintenance*, Bipartisan Policy Center (September 2025), https://bipartisanpolicy.org/report/modernizing-voter-list-maintenance-an-evidence-based-framework-for-access-and-integrity/

[26] American Immigration Council, *Systematic Alien Verification for Entitlements (SAVE): An Overview* (August 3, 2021),https://www.americanimmigrationcouncil.org/research/systematic-alien-verification-entitlements-save-program-fact-sheet. See also "Immigration Status Verification for Benefits: Actions Needed to Improve Effectiveness and Oversight." U.S. Government Accountability Office (March 2017, https://www.gao.gov/assets/gao-17-204.pdf.

[27] Secretary of State, State of Michigan, *Michigan's Elections System Structure Overview*, https://www.michigan.gov/sos/-/media/Project/Websites/sos/Elections/Voter-Education/Michigans-Elections-System-Structure-Overview.pdf?rev=98f35d2e0e7a4443be9453c203b39973&hash=8A7F26E8E86BCB564ADCF5B2663D0184

[28] Joshua Ferrer, Daniel M. Thompson, and Rachel Orey, *Election Official Turnover Rates from 2000-2024*, Bipartisan Policy Center (April 2024), https://bipartisanpolicy.org/download/?file=/wp-content/uploads/2024/04/WEB_BPC_Elections_Admin_Turnover_R01.pdf