



Introduction

Center for Election Confidence, Inc. ("CEC") is a non-profit organization that promotes ethics, integrity, and professionalism in the electoral process. CEC works to ensure that all citizens can vote freely within an election system of reasonable procedures that promote election integrity, prevent vote dilution and disenfranchisement, and instill public confidence in election systems and outcomes.

CEC submits these comments to the U.S. Election Assistance Commission ("EAC") and its advisory committees in support of the important list maintenance provisions described in Executive Order no. 14248.

List Maintenance is a Cornerstone of Election Integrity and Voter Confidence

Along with photo voter identification requirements and strong ballot custodial processes, accurate and timely maintenance of voter registration lists is vitally important to election integrity and voters' confidence in election processes and outcomes. Moreover, voter list maintenance is required by federal law. 52 U.S.C. § 20507. At its simplest level, voter list maintenance ensures only eligible electors may receive and cast ballots and protects against vote dilution, which is prohibited by the Voting Rights Act. *See Thornburg v. Gingles*, 478 U.S. 30 (1986).

This Executive Order directs federal agencies to open databases to state and local election officials to assist with the accuracy of their list maintenance efforts. In many cases, the implementation of this directive will be the first time these officials have had access at a single time to such a large quantity of information relevant to voter list maintenance. These officials will need the support of the EAC's Clearinghouse, Learning Lab, and other best practice guidance to ensure not only compliance with federal law but also successful processing and use of this information for the benefit of voters in next year's federal election. CEC encourages the EAC to develop materials that will allow state and local election officials to make immediate use of these databases.

Consistent Enforcement and Implementation of Federal Law is Paramount

Successful implementation of any reforms to the National Voter Registration Form ("NVRF") will require these and other list maintenance tools in the hands of state and local election officials. Just as important, however, is that the EAC makes every effort to ensure that the NVRF allow the full realization and implementation of state law concerning voter registration and documentary proof of citizenship requirements. For over a decade, the NVRF's printed instructions have conflicted with the legal requirements in several states to register to vote. *See Arizona v. Inter Tribal Council of Arizona, Inc.*, 570 U.S. 1 (2013). CEC encourages the EAC to take this opportunity to resolve this issue for the benefit of voters and well-ordered election administration.

Conclusion

Executive Order no. 14248 presents a unique opportunity for the EAC and its advisory boards to ensure state and local election officials are best positioned to use new access to federal data to conduct accurate voter list maintenance. Further, this executive order will allow the EAC to resolve a long-standing issue with the National Voter Registration Form. CEC encourages the EAC and its advisory boards to take full advantage of these opportunities to improve voters' confidence in election systems and procedures.

Respectfully submitted this 23rd day of April 2025,

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Center for Election Confidence, Inc.