

## Memorandum

**TO:** County Boards of Elections

**FROM:** Sam Hayes, Executive Director

**RE:** “Registration Repair” Project: Reviewing Records of Registered Voters for HAVA-Required Information and Making Necessary Corrections

**DATE:** July 17, 2025

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This Memo explains the procedures for the county boards and their staff to review the records of registered voters who are identified as potentially missing HAVA-required identification information, and for correcting any such records, as may be required. It also discusses how to handle military and overseas-citizen ballot applications where the registrant is missing this information. The State Board voted to direct the county boards to carry out these tasks at a meeting on June 24, 2025.<sup>1</sup>

This is the first step in the State Board’s “Registration Repair” project. Further guidance will be provided at a later date with regard to State Board mailings to voters missing HAVA-required identification information, and how to process in-person voters missing this information.

**The county boards’ review and correction of registration records as detailed in this memo must be completed by August 15, 2025.**

### 1. Background

In early 2024, the State Board issued a new [voter registration application form](#) that corrected a flaw in the prior form.<sup>2</sup> The prior form suggested that an applicant was not required to include on their registration form their driver’s license number; or, if they lack one, the last four digits of their social security number; or, if they lack both, an indication that they do not have these numbers. This information is required by the federal Help America Vote Act (HAVA) and is referred to as “HAVA-required information” in this memo.<sup>3</sup>

The county boards were also instructed in early 2024 that a voter registration form missing this information could not be processed until the voter provided the information. The State Board did

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<sup>1</sup> The full outline of the plan approved by the State Board is available here: [https://s3.amazonaws.com/dl.ncsbe.gov/State\\_Board\\_Meeting\\_Docs/2025-06-24/Hayes\\_Plan%20to%20Collect%20Incomplete%20Registration%20Information\\_Web\\_06242025.potx.pdf](https://s3.amazonaws.com/dl.ncsbe.gov/State_Board_Meeting_Docs/2025-06-24/Hayes_Plan%20to%20Collect%20Incomplete%20Registration%20Information_Web_06242025.potx.pdf).

<sup>2</sup> See [Order](#), N.C. State Bd. of Elections, *IN RE: HAVA COMPLAINT* (Dec. 6, 2023).

<sup>3</sup> 52 U.S.C. § 21083(a)(5)(A)(i)–(ii).

not, however, instruct the county boards to seek any such missing information from North Carolinians who were already registered voters on the rolls.

In April 2025, the North Carolina Supreme Court concluded that the State Board was required to attempt to collect this information under state law.<sup>4</sup> Following this decision, the North Carolina Court of Appeals issued an order to the State Board directing the Board to seek any missing HAVA-required information from existing registered voters before they may be allowed to vote a regular ballot in a future election.<sup>5</sup> The court drew this conclusion by relying on N.C.G.S. § 163-82.4(f), which includes the requirement of a new voter to provide “any required item on the voter registration form” “by 12:00 P.M. on the third business day after the election” for their vote to count, and requires provisional voting when the required information has not been provided by the time of voting.

To comply with these decisions, the State Board has authorized a “Registration Repair” plan to contact voters identified by the State Board as potentially missing HAVA-required information. This will be accomplished by a series of statewide mailings, which are expected to begin in the coming weeks.

In the meantime, the State Board has also directed the county boards to review records in the registration database for voters identified as potentially missing HAVA-required information, and to correct the records where that information was provided by the voter but not entered by the county or where records show that the voter registered before HAVA took effect on January 1, 2004. This memo addresses how the county boards and their staffs should carry out that effort.

## 2. Data Review and Correction by County Boards

After the State Board identifies records of registrations that are apparently missing the HAVA-required information,<sup>6</sup> State Board staff will distribute to the county boards a list of records for individual review.

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<sup>4</sup> *Griffin v. N.C. State Bd. of Elections*, 913 S.E.2d 894, 896 (Apr. 11, 2025).

<sup>5</sup> Certification of Judgment, *Griffin v. N.C. State Bd. of Elections*, No. 25-181, p. 1 (N.C. Ct. App. April 16, 2025) (“The North Carolina State Board of Elections and the county boards of election remain statutorily mandated to review, correct, update, and maintain the roll of lawfully registered voters. N.C. Gen. Stat. §§ 163-82.4(f);163-2.14 [sic] (2023).”).

<sup>6</sup> The State Board’s process looks for any active or inactive voter registrations with a registration date on or after January 1, 2004, that lacks both DL and SSN. Then, State Board IT staff remove from this list any records where our databases contain the HAVA-required information for the voter. This includes voters for whom any record associated with the voter’s NCID (1) contains a DL/SSN that validated, (2) shows the voter presented HAVA ID after their DL/SSN did not validate or the voter indicated they lacked both numbers, (3) shows the voter originally registered prior to 2004, or (4) shows the voter registered using and FPCA or FWAB and either supplied DL/SNN or indicated they lacked both numbers.

**The county board staff shall review all scanned documents in the VoterScan and VoterView records for each registrant on the list to determine if the HAVA-required information was provided and not entered into the database, or if the voter first registered before 1/1/04 and has been continuously registered.**

A manual review of these records by the county boards is required, because there may be items in a voter's record containing the HAVA-required information, even though it has not been entered into the voter registration database. Or, there may be records showing the voter registered prior to HAVA and is therefore exempt from its registration requirements. The county boards shall make any necessary corrections to the registration records, as explained below.

**For any record corrections in VoterScan, county boards must use the document type "County Administrative Correction."** State Board IT staff created this special document type for this project. It allows a county to update a registration record without interrupting any list maintenance or mail verification processes. This means that records of "active" and "inactive" voters will be updated using this document type, and the voters' list maintenance statuses will not be affected.

## 2.1 Located DL/SSNs

If the county finds a DL/SSN in the records, the county shall enter that value in VoterScan, using the "County Administrative Correction" document type, and proceed through the validation of the DL/SSN.

- *Validation failures.* If the number fails validation, the system is not programmed to flag them as "HAVA ID Required" because the voter is an existing voter; the system is only programmed to add this flag when the voter is a new registrant. To account for this, State Board IT staff will run a database script, after this county board review phase is complete, to ensure that such voters have the "HAVA ID Required" flag applied to their records, if they have not already provided HAVA ID in the past.

## 2.2 Located "I do not have" Checkboxes

If the county finds a form with the "I do not have" DL/SSN checkbox marked, and finds no DL/SSN in any other records, county staff shall make a note in the list of "active" records that this particular voter checked the checkbox. Currently, it is not possible to update an existing voter's record in VoterScan with the checkbox. However, with the July SEIMS release (expected at the end of July), VoterScan will permit this action. Until then, the counties shall keep a record of all registrants who need to have this checkbox marked in their records for when this feature becomes available later this month.

When this feature is available at the end of July, county staff will need to perform a data entry to the voter's VoterScan record using the "County Administrative Correction" document type, and

check the “No Identification # to Provide” checkbox with a note explaining, “No ID to provide checkbox added based on review of voter’s record.”

### 2.3 Located Registration Prior to 2004

If the county determines that the voter originally registered in the county before 1/1/04 and has been continuously registered, the county shall correct the registration date on the record to reflect the true date of the voter’s first registration.

## 3. Verifying DL/SSN Was Provided for Each UOCAVA Ballot Requester

To address military and overseas-citizen absentee ballot requesters (also known as “UOCAVA” voters) who have failed to supply the HAVA-required registration information, the list supplied by the State Board for the county review as explained in Section 2 of this memo will also denote whether a registrant is a UOCAVA ballot requester (FPCA/FWAB). After conducting the steps in Section 2 and confirming the registrants who have not supplied the information required to complete their registration, the county boards shall do the following with respect to FPCA/FWAB requesters who have not supplied the required information:

- Spoil the voter’s UOCAVA ballot request in VoterView, which is the method available in SEIMS to put this request on hold while the information is requested. The county board shall then send the “ID Letter (UOCAVA),” which is appended to this memo, via U.S. mail and email (if provided). This will notify the voter that they must provide DL or SSN, or explain that they lack both, to complete their registration before their ballot request may be processed.

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Upon completion of this review period, State Board staff will survey the counties to confirm that each county has completed this review.

# [COUNTY] COUNTY BOARD OF ELECTIONS

[MAILING ADDRESS]

[CITY/STATE/ZIP]

Phone: [Phone Number] • Fax: [Fax Number] • [Email Address]

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[DATE]

**TO:** [Applicant Name]  
[Applicant Mailing Address]  
[Applicant Mailing City, State, ZIP]

**RE: REQUEST FOR IDENTIFICATION  
INFORMATION**

Federal law (the Help America Vote Act of 2002 (“HAVA”)) requires first-time registrants to provide certain identity information to the board of elections when registering to vote. When you registered to vote in this county using the form for military and overseas citizens, you did not provide this information on your form.

Before you can receive your ballot or have your ballot counted (if you already submitted it), you must provide our office with either your North Carolina Driver license number or your North Carolina Identification Card Number issued by the DMV, or if you do not have one, the last four digits of your social security number. If you do not have any of these identification numbers, you must confirm that by checking the appropriate box below.

You may submit the form below by mail, fax, or email, using the contact information at the top of this letter.

If our office does not receive this information by 5 pm on the day before election day, you will not be able to submit a ballot for military or overseas citizens.

**FRAUDULENTLY OR FALSELY COMPLETING THIS FORM IS A CLASS I FELONY UNDER CHAPTER 163 OF THE NC GENERAL STATUTES.**

Provide your identification information below:

- NC Driver’s License Number \_\_\_\_\_
- NCDMV Identification Card Number \_\_\_\_\_
- Last four digits of Social Security Number \_\_\_\_\_
- I do not have an NC driver’s license/DMV ID card number or social security number.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date