



Numbered Memo 2025-02

TO: County Boards of Elections
FROM: Sam Hayes, Executive Director¹
RE: Provisional Voting for Registration Repair Voters
DATE: August 27, 2025 (revised September 8, 2025)

This numbered memo provides guidance on the administrative procedures for the county boards of elections to proceed when a Registration Repair voter presents to vote in person at an early voting or Election Day voting site. This guidance includes how poll workers shall be trained by the county boards, what information must be explained and provided to the voters, and how the county boards should proceed when reviewing and approving the provisional ballots voted by Registration Repair voters.

1. Background

The federal Help America Vote Act (HAVA)² and state law³ require an applicant to include on their registration form their driver's license number (DL); or, if they lack one, the last four digits of their social security number (SSN⁴); or, if they lack both, an indication that they do not have these numbers. On June 24, 2025, the State Board authorized a "Registration Repair" project to obtain the HAVA-required information from already-registered voters identified by the State Board as missing that information in their voter record and who registered on or after the effective date of HAVA (January 1, 2004).⁴ Mailings to the identified voters began in August of

¹ This memo was originally approved by a vote of the State Board on August 27, 2025. A revised version of this memo was approved by a vote of the State Board on September 8, 2025, explaining that further attempts to validate a provided but unvalidated identification number should be followed in accordance with Numbered Memo 2025-03.

² 52 U.S.C. § 21083(a)(5)(A)(i)–(ii).

³ G.S. § 163-82.4.

⁴ The background on the need for the Registration Repair project, the State Board review of the registration records to identify registered voters who are identified as potentially missing HAVA-required identification information, and the procedures for the county boards and their staff to review the records

2025 to alert them to the need to provide the HAVA-required information, and that they may have to cast a provisional ballot the next time they vote if they do not provide that information beforehand.

2. Administrative Status Assigned to Registration Repair Voters

On August 18, 2025, the Registration Repair voters who had not provided the HAVA-required information as of that date were flagged as “Inactive” with the reason “DL/SSN-Update Record.”⁵ An “Inactive” voter is still a registered voter.

If a Registration Repair voter provides the HAVA-required information before voting in person, they will be changed to an Active status and will not be flagged to be required to vote a provisional ballot. Similarly, a Registration Repair voter will be changed to an Active status if they submit a complete absentee ballot request, because they are required to provide DL/SSN4 with the ballot request, and that request serves to update their registration record.⁶ Even though these voters’ administrative status will change, if the provided numbers are not validated (i.e., confirmed to match a government database) or if they check the box indicating they do not have an identification number, and the registration records do not show the voter previously showed an identification document known as a “HAVA ID,” then they will be required to show a HAVA ID before casting a ballot.⁷ The two types of HAVA ID are:

- A current and valid photo identification, such as a driver’s license; or
- A physical or electronic copy of a document that is current and shows the voter’s name and address, if that document is a utility bill, bank statement, government check, paycheck, or other government document.⁸

If the Registration Repair voter provides DL/SSN4 and it doesn’t validate, the county board shall proceed with the processes in Numbered Memo 2025-03 to seek to otherwise validate the number.

of those voters can be read in the July 17, 2025, [Memorandum on Reviewing Voter Records for HAVA-Required Information](#).

⁵ Processes have previously been implemented to not permit the processing of a registration application without the HAVA-required information, meaning the voters identified as Registration Repair voters at this time typically will not include any new registrants in the State.

⁶ G.S. §§ 163-230.2(a)(4) and (b).

⁷ G.S. § 163-166.12(d).

⁸ G.S. §§ 163-166.12(a), (b).

3. Voting Procedures for In-Person Registration Repair Voters

3.1 Provisional Voting for Registration Repair Voters

A Registration Repair voter who presents to vote in person and is still flagged as Inactive with the reason DL/SSN-Update Record will be required to vote a provisional ballot, so that elections officials can obtain and validate the HAVA-required information to complete the voter's registration.

Both SOSA and OVRD, the electronic pollbooks developed and maintained by the State Board for early voting and Election Day voting, respectively, have been programed so that poll workers are required to issue a provisional ballot to these Registration Repair voters. County boards shall train their poll workers that when they check these voters in, the poll worker will follow the instructions provided in the SOSA/OVRD error message alerting them that the voter must vote a provisional ballot. The poll worker shall then refer the voter to the help station where the voter will be offered a provisional ballot.

For counties using paper pollbooks, these Registration Repair voters will have "DL/SSN PROVISIONAL ONLY" listed on the pollbook label for the voter. County boards shall train their poll workers that when they see this flag on a voter's label, the poll worker will immediately inform the voter that they will be referred to the help station where the voter will be offered a provisional ballot.

At the help station, the poll worker shall record the provisional reason as "DL/SSN PROVISIONAL" and note the reason on the provisional envelope as "HAVA ID NOT Provided" or "NO ID PROVIDED." **The county boards shall train their poll workers to instruct the voter to provide on the provisional application their driver's license number, or, if they don't have one, the last four digits of their social security number, or, if they lack both, to check the box indicating that they lack either number.** The poll worker shall also provide the voter with the Notice To DL/SSN Provisional Voters handout to help explain why the voter is voting a provisional ballot. This handout also identifies the acceptable types of HAVA ID the voter will be asked to show and which the poll worker will be required to mark on the provisional application, as discussed below.

3.2 Registration Repair Voters Asked to Show HAVA ID

If the Registration Repair voter checks the box on the provisional application that they do not have either DL or SSN4, then the poll worker shall request that the voter show a HAVA ID.⁹ If

⁹ 52 U.S.C. § 21083(b)(2)(A).

the voter is unable to show a HAVA ID at the voting place, then the poll worker shall tell the voter that if the registration records do not show the voter previously showed a HAVA ID, they will be contacted by the county board to show a HAVA ID no later than 12 p.m. (noon) on the third business day after Election Day to have their ballot counted.

If the Registration Repair voter provides DL/SSN4 on the provisional application, the poll worker shall request that the voter show a HAVA ID in case the number provided cannot be confirmed. If the voter is unable to show a HAVA ID at the voting place, then the poll worker shall tell the voter that if the DL/SSN4 is not confirmed, and registration records do not show the voter previously showed a HAVA ID, they will be contacted by the county board to show a HAVA ID no later than 12 p.m. (noon) on the third business day after Election Day to have their ballot counted.

If the Registration Repair voter shows a HAVA ID when voting, the county boards shall train their poll workers to mark the type of ID that was supplied by the voter (for example, NCDL, student ID, etc.) in the HAVA ID section of the provisional application. County board staff shall enter the HAVA ID information in the ID Provided column of the provisional module in SEIMS. Having poll workers clearly mark the HAVA ID that was provided for these voters will ensure there is a clear record that HAVA ID was provided, in case the voter falls into one of the categories that would need to show HAVA ID once the county board processes the provisional application and ballot.

Poll workers shall provide all Registration Repair voters with the Provisional Instruction Sheet, checking the box for “I voted a provisional ballot for a reason not listed above.”

4. Counting the Registration Repair Voter’s Provisional Ballot

After the Registration Repair voter casts their provisional ballot, the county boards shall promptly enter the DL/SSN4 or “I don’t have” checkbox into the voter’s record and seek to validate any DL/SSN4 provided.

- If the DL/SSN4 validates and the voter is voting provisionally only for the DL/SSN-Update Record reason, the county board shall approve the provisional application and the ballot shall count for all contests on the ballot the voter is eligible to vote in.
- If the DL/SSN4 doesn’t validate but the voter has provided HAVA ID at any point in their registration history up until 12 p.m. (noon) on the third business day after Election Day, and the voter is voting provisionally only for the DL/SSN-Update Record reason, the county board shall approve the provisional application and the ballot shall count for all contests on the ballot the voter is eligible to vote in.
- If the voter checked the checkbox that they do not have a driver’s license or social security number and is voting provisionally only for the DL/SSN-Update Record reason,

and the voter provided HAVA ID by 12 p.m. (noon) on the third business day after Election Day, the county board shall approve the provisional application and the ballot shall count for all contests on the ballot the voter is eligible to vote in.

The only circumstances in which the provisional application should be disapproved and ballot not counted **in state and local contests** for a Registration Repair voter who is voting provisionally only for the DL/SSN-Update Record reason would be:

1. The voter did not provide the DL/SSN4 or mark the checkbox for lacking DL/SSN4 on the provisional application at all, which should not occur if the poll workers are properly instructing voters to complete this information.
2. The voter provided a DL/SSN4 that did not validate, and the voter has never shown HAVA ID between the time they first registered and the deadline to do so in the current election.
3. The voter checked the checkbox for lacking DL/SSN4, and the voter has never shown HAVA ID between the time they first registered and the deadline to do so in the current election.

In all three scenarios, the county board staff, while conducting provisional research, shall contact the voters by phone or email, where available, to supply the missing information in writing to the county board before 12 p.m. (noon) on the third business day after Election Day.¹⁰ If the information is provided by that deadline, the provisional application shall be approved and the ballot shall count. If not, then the ballot shall not be counted in state and local contests.

For federal contests, the National Voter Registration Act (NVRA) prevents election officials from discounting votes cast by these voters, who are registered voters, even if their registration records lack the missing information. **Accordingly, the provisional votes cast by Registration Repair voters (i.e., “Inactive” with the reason “DL/SSN-Update Record”) for federal contests must be counted, unless the voter is ineligible for some other reason.**

¹⁰ N.C.G.S. §§ 163-82.4(f), 163-166.12(d).