NORTH CAROLINA
STATE BOARD OF ELECTIONS

Numbered Memo 2025-03

TO: County Boards of Elections

FROM: Sam Hayes, Executive Director[1]

RE: Procedures When Identification Numbers Do Not Validate

DATE: September 8, 2025

This numbered memo provides procedures for the county boards of elections to follow when a registered voter has supplied a driver's license number or last four digits of their social security number on their voter registration form, but the number provided failed to validate.

This guidance includes processes for attempting to resolve validation errors when processing registration applications at the county board office, after voters have been contacted about those validation errors, and when checking in a voter at the voting place. **The procedures for carrying out the instructions in this Numbered Memo shall be implemented beginning with the 2026 primary election, with deadlines to start the implementation of certain procedures further explained below.**

1. Background on Validation of Identification Numbers

The federal Help America Vote Act (HAVA)[2] and state law[3] 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. When that applicant has included a DL or SSN4 on their voter registration form, that number goes through a validation process where the county board attempts to confirm that the number the voter provided, along with the applicant's first and last name and date of birth, matches a record in the NCDMV or Social Security Administration databases. If a DL is provided, then the number is matched against NCDMV's records. If a SSN4 is provided, then the number is matched against the Social Security Administration's records through a data matching process via the NCDMV.

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[1] This memo was approved by a vote of the State Board on September 8, 2025.

[2] 52 U.S.C. § 21083(a)(5)(A)(i)–(ii).

[3] G.S. § 163-82.4.

When the provided number has not validated, which can occur for any number of reasons (e.g., the person's legal name has changed but the record being matched has not also been updated), state law requires the applicant to show an identification document known as a "HAVA ID" before casting a ballot in the first election in which they vote.[4] If the applicant shows a HAVA ID, then they vote a regular ballot. But if the applicant does not show a HAVA ID, then they may vote a provisional ballot and have until 12:00 P.M. on the third business day after the election to provide the HAVA ID to have their provisional application approved and their ballot counted.[5]

As long as an applicant has provided a DL or SSN4 and, if required by law, shown a HAVA ID, then their registration is complete, unless there is a separate reason why they are ineligible to register and vote.

When their DL/SSN4 fails to validate through the database match, state law requires the county board to notify the voter that the number did not validate, to attempt to resolve the discrepancy, and, if the mismatch is unresolved or the number is not otherwise validated by the county board, to notify the voter of the need to present HAVA ID before or when voting for the first time.[6] Additionally, the State Board has concluded that, in order to maintain the accuracy of the voter rolls, it is necessary to implement our best efforts to resolve database mismatches and to maintain a validated personal identification number for each voter. Such numbers play an important role in ongoing voter list maintenance and voter verification.

Accordingly, the county boards shall take the actions outlined in this Memo to attempt to validate voters' DL/SSN4 and, if unable to validate that number, request that the registered voter assist the county board in resolving that issue.

2. Scope of Voters Covered by the Procedures in this Memo

An "Unvalidated DL/SSN" voter is an individual who is a new applicant to register to vote or an already-registered voter, and who has provided a DL/SSN4 with their voter registration that has not validated. If the Unvalidated DL/SSN voter's registration record indicates they have shown a HAVA ID, then they will not be flagged as required to again show a HAVA ID or to vote a provisional ballot due to this flag. The flag is instead intended to prompt county boards and poll workers to request the voter's assistance in resolving the data discrepancy.

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[4] G.S. § 163-166.12(d).

[5] G.S. §§ 163-166.12(d), (e).

[6] G.S. § 163-82.12(9); G.S. § 163-166.12(d).

If the Unvalidated DL/SSN voter has yet to show a HAVA ID, then they will also be flagged as an ID Required voter. Doing so will ensure that they are sent an ID Required letter notifying them that the number they provided did not validate, as discussed below in Section 4.1 of this Memo, and that, if they do not show a HAVA ID prior to or when voting for the first time, they will be flagged to vote a provisional ballot.[7]

The following categories of voters are <u>NOT</u> Unvalidated DL/SSN voters:

- <u>Voters who have provided a DL/SSN4 that has been validated.</u>
- <u>Voters who have checked the checkbox on the voter registration form stating that they have neither a DL nor an SSN4.</u> If these voters have not shown a HAVA ID, then they are flagged as an ID Required voter and must provide a HAVA ID before they can have their votes counted at the first election in which they vote. If these voters do not show a HAVA ID prior to or when voting for the first time, then they will vote a provisional ballot.[8] If these voters have shown a HAVA ID, then no further action by the county board is needed because there is no data validation discrepancy to attempt to correct.
- <u>Voters who registered before the effective date of HAVA (January 1, 2004).</u> These voters were not required by law to provide a DL or SSN4, validated or otherwise, to register and vote.

The following category of voters are <u>not currently</u> Unvalidated DL/SSN voters, but they may become Unvalidated DL/SSN voters after completing their registration:

- <u>Registration Repair voters.</u> Voters in the "Registration Repair" project are those voters who registered on or after the effective date of HAVA (January 1, 2004), are missing a DL/SSN4 in their voter record, and have not indicated that they have neither number.[9] These voters will remain flagged as Registration Repair voters until they provide the missing information from their registration. Then, after they have provided the missing information, they will no longer be flagged as a Registration Repair voter. However, if their newly provided DL/SSN4 remains unvalidated, they will be flagged as an Unvalidated DL/SSN voter.

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[7] G.S. § 163-166.12(e).

[8] G.S. § 163-166.12(e).

[9] See Numbered Memo 2025-02 and the July 17, 2025, Memorandum on Reviewing Voter Records for HAVA-Required Information for more information and background on the Registration Repair project.

3. County Board Processes for Resolving DL/SSN4 Discrepancies

3.1 New Registration Applicants

State law provides that, regardless of whether they registered by mail or by another method, if the applicant has provided an unvalidated DL/SSN4 on their registration form, the county board must notify the voter of that fact and attempt to resolve the discrepancy.[10] **Starting with voter registration applications received by a county board of elections on or after January 1, 2026,**[11] when an applicant's DL/SSN4 is initially flagged as unvalidated in SEIMS, the county board shall complete a data entry error review. **This means the county board shall review the application and the information entered into SEIMS to determine if there are data entry errors in the first name, last name, date of birth, or DL/SSN4 field that need to be corrected and then correct those errors.**

Common data entry errors may include:

- A name field adding or omitting hyphens, apostrophes, or spaces; listing names in the incorrect field; or misspelling a name. Reviewing the signature may help with determining proper spelling or order of the applicant's name.
- A date of birth field listing a day or month in the wrong field; the wrong number being entered because what was written appears at first to be a different number; or transposing numbers.
- A DL/SSN4 field not including enough numbers when the number is a DL; the wrong number being entered because what was written appears at first to be a different number; or transposing numbers.

This data entry error review, including any necessary corrections to the information entered into SEIMS, shall be completed on an expedited basis after a county board has received an applicant's voter registration form.[12] If the county board is able to validate the DL/SSN4 after this review, then no further action is required by the applicant.

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[10] G.S. § 163-82.12(9).

[11] This data entry error review may be taken for new applications prior to this date. However, this additional data entry error review will not be required until January 1, 2026, to afford the county boards sufficient time for training employees who process voter registration forms.

[12] 52 U.S.C. § 21083(a)(1)(A)(vi). An expedited basis means the review must be completed and any corrected information entered not later than 10 days after the registration form is received. If the form is received within 5 days before the registration deadline for an election, then that deadline is not later than

If there are no data entry errors, or attempts to correct any perceived data entry errors do <u>not</u> result in the validation of the provided DL/SSN4, the number shall be considered unvalidated, the application shall be processed, and the applicant shall be sent the ID Required letter discussed below.

County boards may take other reasonable actions to validate the number. However, any other actions taken shall not delay the processing of the applicant's voter registration form beyond the expedited basis time period for this review. If those other actions do result in the validation of the DL/SSN4, then the voter shall be informed that they do not need to provide a HAVA ID before voting.

3.2 Registered Voters Without a Validated DL/SSN4

No later than December 15, 2025, the county boards shall complete a review of the registration records of the voters who currently lack a validated DL/SSN4. Because these are already-registered voters, the county boards shall also review these voters' registration records that are on file (e.g., scans of older forms saved to their record) to determine if there was a potential data entry error in the DL/SSN4 that caused the DL/SSN4 to not validate. If the county determines there was a data entry error by the county when the name or date of birth currently on file was entered, then that may be corrected as well. For this one-time review of already-registered voters, for any record corrections in VoterScan, county boards must use the document type "County Administrative Correction."[13] The county shall then attempt to validate any DL/SSN4 that was previously provided by the voter using the voter's first name, last name, and date of birth currently on file.

If there is no data entry error, it may appear that the voter may have used a prior name, a prior spelling of a name, or made an error when completing their registration form (e.g., a review of other documents in their registration record shows they may have transposed letters in their name or transposed numbers in their date of birth). In that situation, the voter's current name or date of birth should not be changed in SEIMS but there should again be an attempt to validate the

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5 days after the registration form is received. Finally, if the registration form is received after the voter registration deadline before an election but before the county canvass for that election, then that deadline is no later than 10 days after the county canvass.

[13] As explained in the July 17, 2025, Memorandum on Reviewing Voter Records for HAVA-Required Information, State Board IT staff created this special document type for the Registration Repair project so that a county can update a registration record without interrupting any list maintenance or mail verification processes.

DL/SSN4 with the current name and date of birth. If the number does not validate, then the county shall make a note of that possible reason for the DL/SSN4 not validating. Doing so will help the county identify for the Unvalidated DL/SSN voter a potential reason for the number not validating, and the voter can then be prompted to update their registration, if needed.

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

To carry out this review, State Board staff shall prepare a list of these voters by September 21, 2025, and provide that list to each county board along with instructions on when and how to process a record correction or make a note of the potential reason for the DL/SSN4 not validating. State Board staff shall prepare an updated list of these voters after the county canvass for the November municipal elections and shall provide that list to the county boards no later than November 21, 2025, a week after the county canvass.

Once the county boards have completed the data entry error review for these voters, and before the start of early voting in the March 2026 primary, voters who fit this description shall be flagged by State Board staff in SEIMS with a new designation identifying them as being an Unvalidated DL/SSN voter. This flag will stay with the voter until they provide a DL/SSN4 that validates.

After the date that these voters have been flagged as Unvalidated DL/SSN voters, any registered voter who newly fits the description of a Unvalidated DL/SSN voter will also be designated with that flag (i.e., Registration Repair voters who have shown a HAVA ID to complete their registration yet still have an unvalidated DL/SSN4 in their registration record).

4. Contacting Voters with Unvalidated DL/SSN4

4.1 ID Required Letter

For new voter registration applicants whose DL/SSN4 fails to validate, the State Board will distribute a modified "ID Required" letter so that county board officials can inform those applicants specifically why they are an "ID Required" voter. The letter shall inform an applicant with an unvalidated DL/SSN4 that they are requested to contact the county board to assist with resolving the discrepancy so that their DL/SSN4 can be validated. **The revised ID Required letter shall be finalized for use by the county boards no later than January 2, 2026.**

If an applicant contacts the county board to resolve the discrepancy and needs to submit a corrected DL/SSN4, the applicant shall be informed that they must do so in writing, which can be done by completing the relevant section on the ID Required letter and returning it to the

county board, or by submitting a new voter registration form. A voter may return either form via email, fax, mail, or personal delivery. When the county board receives that updated information from the applicant, the county board must enter that information into SEIMS and attempt to validate the DL/SSN4 on the same expedited basis described in Section 3.1 of this Memo.

4.2 Unvalidated DL/SSN Letter

The State Board shall send a mailing to Unvalidated DL/SSN voters in January of 2026 informing those voters that the county board has been unable to validate their DL/SSN4 and that the voter is requested to contact the county board to assist with resolving the discrepancy.[14]

The State Board will thereafter distribute a new "Unvalidated DL/SSN" letter so that county board officials can inform those voters that the county board has been unable to validate their DL/SSN4 and that the voter is requested to contact the county board to assist with resolving the discrepancy. **The county boards shall send the Unvalidated DL/SSN letter in January and August of each year, starting in August of 2026.** When sending the letters, the county boards shall send them to all existing Unvalidated DL/SSN voters registered to vote in the county as of the date of the mailing.

If an Unvalidated DL/SSN voter contacts the county board to resolve the discrepancy and needs to submit a corrected DL/SSN4, the voter shall be informed that they must do so in writing, which can be done by submitting a new voter registration form. A voter may return the form via email, fax, mail, or personal delivery. The voter may submit an updated voter registration form through the NCDMV's secure website (payments.ncdot.gov). When the county board receives that updated information from the Unvalidated DL/SSN voter, the county board must enter that information into SEIMS and attempt to validate the DL/SSN4 on the same expedited basis described in Section 3.1 of this Memo.

5. Voting Procedures for Unvalidated DL/SSN Voters

Before the March 2026 primary election, both SOSA and OVRD, the State Board's electronic pollbooks for early voting and Election Day voting, respectively, will be programed so that poll workers are alerted that a voter is an Unvalidated DL/SSN voter when they check in. For counties using paper pollbooks, the pollbook label for the voter will have a flag identifying the voter as an Unvalidated DL/SSN.

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[14] This mailing is the same Mailing 2 planned to be sent as part of the Registration Repair project. The mailing will be sent in January of 2026 so that the preliminary data entry error review discussed in Section 3.2 of this Memo can first be carried out. See Plan to Collect Incomplete Registration Information from Certain Voters, p. 4 (approved by the State Board on June 24, 2025).

County boards shall train their poll workers to use an Unvalidated DL/SSN Voter script and handout to provide information to the voter when they see the SOSA/OVRD message or poll book label flag for an Unvalidated DL/SSN voter when checking the voter in. **The script and handout shall be prepared by the State Board and distributed to the county boards for training purposes no later than January 2, 2026.**

The script shall require the poll worker to tell the voter the following:

- that the voter is requested to help the county board resolve a mismatch of their DL/SSN4 so that number can be validated and their registration record updated;
- that the voter may choose to do so by completing a change form at the check-in station, or they may contact the county board at a later date to do so;
- that if they decline to complete the change form at the time of voting they will still proceed with voting a regular ballot; and
- that their unvalidated DL/SSN4 alone will not prevent their votes from being counted.

The handout shall also be given to the Unvalidated DL/SSN voter to help explain that the voter's assistance is requested to help the county board resolve a mismatch of their DL/SSN4 so that number can be validated and their registration record updated.

Finally, the county boards shall train their poll workers to understand the different voting processes for a Registration Repair voter, an ID Required voter, and an Unvalidated DL/SSN voter. This training shall include reasons why a voter may be categorized as one of these voters. This training shall also include instructions that a Registration Repair voter is required to vote a provisional ballot, that an ID Required voter may be required to vote a provisional ballot if they fail to show a HAVA ID, and that an Unvalidated DL/SSN voter shall not be required to vote a provisional ballot solely because of that designation.[15]

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[15] An Unvalidated DL/SSN voter may be required to vote a provisional ballot for other reasons, such as when there are questions about the voter's eligibility to vote in the contests on the ballot, G.S. § 163-166.11, or if the voter does not or cannot present photo ID when voting in person, G.S. § 163-166.16. See Numbered Memo 2023-04 regarding provisional ballots.