

August 26, 2019

# **Overview of Voter File Maintenance**

# A. Introduction

Voter file maintenance is an ongoing process that ensures accuracy of the voter registration rolls. The Department of Elections (Department) conducts activities related to voter file maintenance in accordance with relevant Federal, State, and local laws. These activities involve removing records of voters who are no longer eligible to vote, updating records so that the information on file accurately reflect the voter's correct information, and performing ongoing validation of the information in voter records.

Three federal enactments set a framework for voter file maintenance while protecting the rights of voters — the National Voter Registration Act (NVRA) of 1993, the Help America Vote Act (HAVA) of 2002, and the Voting Rights Act of 1965.

The California Elections Code (CAEC) builds upon federal requirements for voter file maintenance and mandates specific procedures for keeping records up to date.

Further, to ensure statewide compliance with the NVRA, the Secretary of State (SOS) developed the California NVRA Manual; Chapter 5 of this manual provides guidance for conducting voter list maintenance.

The Department conducts voter file maintenance activities using the Election Information Management System (EIMS) and VoteCal, California's statewide, centralized registration database that the Secretary of State's Office (SOS) administers. VoteCal enables the Department to validate records through a statewide lens by comparing voter data across county lines, preventing instances of record duplication, and allowing the Department to access additional sources of voter data. Voter file maintenance activities that are facilitated using the VoteCal application are noted in this document.

The Department processes all voter registration applications submitted in person, by mail, or online at the SOS' website, *registertovote.ca.gov.* In 2018, the Department began processing applications transmitted by the Department of Motor Vehicles (DMV) to the SOS via the new Motor Voter program. Since October 2018, the SOS has been performing a secondary review of Motor Voter records to confirm the accuracy of the information before sending these records to counties for processing.

The Department reviews all registration applications, from all sources, for eligibility and completeness during the processing of these records and strives to maintain the accuracy of records in the database through ongoing validation processes. This document provides a brief overview of the Department's voter file maintenance activities.

# B. Removing Ineligible Voter Records

#### 1. Removal of Deceased Records

a. California Department of Public Health (CDPH) Deceased Listings

On a weekly basis, VoteCal generates a list of deceased records using data provided by the California Department of Public Health (CDPH). These records include persons who passed away in and outside of California. After receiving this list, Department staff compares deceased records with current registration records. When a match is identified, the record is cancelled.

b. San Francisco Department of Public Health (SFDPH) Deceased Listings

On a biweekly basis, the Department receives a list of deceased persons from the San Francisco Department of Public Health (SFDPH). The list includes registered deaths of persons 16 years of age or older. After receiving this list, Department staff compares deceased records with current registration records. When a match is identified, the record is cancelled.

c. San Francisco Chronicle Obituary Listings

On a weekly basis, the Department reviews obituaries published in the San Francisco Chronicle during the previous week, and compares information printed in the obituary with current registration records. As a safeguard against errors, the Department verifies the information printed in the obituary against public health records. If the information cannot be verified, the Department sends notification to the voter's address on file prior to any cancelation occurring.

d. Deceased Notifications Submitted by Individuals

The Department produces a form that allows individuals to notify the Department that a voter is deceased, which can be submitted in-person, by mail, or on the Department's website. The form requires several identifying factors about the deceased person, including the name, date of birth, and date of death, in addition to a statement under penalty of perjury that the information provided on the form is correct. As a safeguard against errors, the Department verifies the information provided about the deceased voter against public health records. If the information cannot be verified, the Department sends notification to the voter's address on file prior to making any changes the record.

### 2. Removal of Records for Voters that No Longer Meet Eligibility Requirements

a. California Department of Corrections and Rehabilitation (CDCR) Felony Listings

Once a month, VoteCal generates a list of records of persons who have committed a felony, using data provided by the California Department of Corrections and Rehabilitation (CDCR). After receiving this list, Department staff compares these records against current registration records. When a match is identified, the record is cancelled.



b. San Francisco Superior Court Listings

Once a month, the Department receives a list of felony conviction reports from the San Francisco Superior Court. After receiving this list, Department staff compares these records against current registration records. When a match is identified, the record is cancelled.

#### 3. Inactivation and Removal of Records for Voters who Moved out of San Francisco

a. Move-out Notifications Submitted by Voters

The Department receives move-out notifications submitted by voters from various sources, including address confirmation postcards, cancellation forms, written letters, and other forms of correspondence.

When a voter provides a new address to the Department outside of San Francisco, but within California, the Department forwards the voter's registration record to the new county using VoteCal, and cancels the voter's registration in San Francisco.

If a voter provides a new address outside of California, or if a voter requests to cancel their registration in San Francisco without providing a new address, the Department cancels the voter's registration.

b. Move-out Notifications Submitted by Third-Parties

The Department receives move-out notifications submitted by third-parties from several sources, including USPS National Change of Address (NCOA) data transmitted by VoteCal, Address Change Service (ACS) data, which is generated from the mailing of the Voter Information Pamphlet, and undeliverable mail pieces returned to the Department's office by the USPS.

Department staff reviews and processes all address change information from these sources upon receipt.

If the voter's new address is located in another county in California, the Department forwards the voter's registration record to the new county using VoteCal and cancels the voter's registration in San Francisco. If the new address is located outside of California, the Department sends a forwardable address confirmation postcard to the voter and sets the voter record to Inactive status. Following inactivation, if a voter does not vote in two consecutive federal general elections or contact the Department to confirm residency in San Francisco during this period, the voter's registration is cancelled, and a notice is sent indicating the cancellation.

#### 4. Removal of Duplicate Records

When VoteCal detects a possible match between a San Francisco record and another voter record in California, VoteCal will generate a potential duplicate match message. Department staff reviews and processes potential duplicate match messages on a daily basis.



To strengthen the Department's ability to detect and correct potential duplicate records, the Department created a supplemental application that queries the voter file, using partial matching criteria. This application helps to identify additional potential duplicate records that are not detected by VoteCal's queries.

Department staff reviews potential matches identified by VoteCal and internal queries, comparing data fields such as the voter's name, address, driver's license number, and social security number. After a match has been reviewed and confirmed, the records are merged and the duplicate record is removed.

## C. Updating Voter Records

#### 1. Voter Forms and Written Requests

The Department reviews and processes registration update forms, language preference forms, vote-by-mail ballot requests, and other written requests submitted by voters to update their information on file. When a voter with inactive status requests to update the information on file and confirms continued residence in San Francisco, the Department will activate the voter's record, and update the record's fields according to the information provided.

#### 2. Address Confirmation Postcards

The Department reviews and processes returned address confirmation postcards, which are sent to voters when the Department receives notification that a voter has moved from a third-party source. The postcard provides fields for voters to confirm their current address information on file or to provide a new residential address or mailing address to the Department.

#### 3. Changes Submitted at the Polling Place

The Department provides the opportunity for voters to update their information when they vote at a polling place on Election Day.

The polling place roster contains a section for voters to request to update their information, such as mailing address, language preference, or vote-by-mail status, and a section for individuals to notify the Department if a voter listed on the roster has moved or is deceased.

If a voter provides a new address on the Provisional Ballot Envelope, the Department updates the voter's address according to the address provided on the envelope.

Department staff reviews all polling place rosters and provisional envelopes after every election and makes updates to voter records according to the information provided.

#### 4. Changes Submitted Online

Voters may request some updates on the Department's website, sfelections.org, such as changes to their language preference or voter guide delivery preference. The Department receives these requests electronically, and updates the voter's information according to the request.



### 5. Updates Submitted by Third Parties

The Department receives change of address information submitted by third-parties from several sources, including USPS National Change of Address (NCOA) data transmitted by VoteCal, Address Change Service (ACS) data, which is generated from the mailing of the Voter Information Pamphlet, and undeliverable mail pieces returned to the Department's office by the USPS.

If these sources indicate that the voter has moved to a new address in San Francisco, Department staff will update the voter's information on file and send a forwardable address confirmation postcard to the voter.

## D. Ensuring Accuracy of Voter Data

### 1. Quarterly Audits to Detect Outdated, Incomplete, or Deficient Data

The Department continuously strives to develop new methods to validate and standardize the voter database. To that end, the Department performs quarterly audits to identify and correct potential deficiencies in voter data such as unstandardized address fields, special characters in voter information, or incomplete contact information. To facilitate these audits, the Department runs several queries to isolate records that have not been reviewed yet in previous audits. During the review of these records, staff compares the data on the voter record with the information in the voter's affidavit of registration and other supporting documents to verify data entry accuracy.

#### 2. Ongoing Validation and Quality Control Processes

As an additional quality control mechanism, the Department developed a data maintenance application that continuously runs queries to identify records with potential errors, and displays these records in a dashboard. The application allows the Department to detect data entry errors made by staff in near-real-time so that these records can be corrected and staff can be retrained of proper procedures.

