

An Updated Federal System to Verify Voter Citizenship

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On May 22, USCIS announced¹ an overhaul of the SAVE system that would allow election officials to verify the citizenship of voter registrants. USCIS and DOGE called the newly expanded system “a single, reliable source for verifying immigration status and U.S. citizenship nationwide.”

Clean data is foundational to efficient government. Accurate, well-maintained data systems are the backbone of streamlined and responsive government services in the digital era. In elections, accurate data enables smoother registration, verification, and voting experiences for the public. It eliminates the need for clunky, physical document-based citizenship checks like those proposed in the SAVE Act.²

Yet, poor-quality data consumes far more time and resources than it saves. Sloppy information can lead to errors that threaten eligible voters’ access to the ballot. State election officials must protect their voters from being flagged or removed based on bad data.

SUCCESS REQUIRES QUALITY DESIGN

The success of the new project will rise and fall on the quality and operability of the updated system. Historically, USCIS’s SAVE system had serious limitations for elections officials. The updates announced on May 22 address a number of these, but we also recognize that USCIS merged a massive amount of data from multiple federal agencies — while also establishing new verification procedures — in just a few months. New features will require testing and validation to identify and address remaining gaps:

- **Gaps in U.S. Citizenship Records:** SAVE was previously unable to verify U.S.-born citizens, who make up the vast majority of state voter rolls. Data from the Social Security Administration’s (SSA) database addresses this issue only partially: SSA began adding U.S. citizenship tags roughly 40 years ago, and so the agency’s data on natural-born citizens is incomplete. In addition, someone who acquired U.S. citizenship but did not apply for the Certificate of Citizenship — for example, a child born overseas to U.S. citizen parents — may not be included.³
- **Reliance on Social Security Numbers:** SAVE previously verified individuals based upon a person’s unique Alien Registration Number (commonly called an A-number), USCIS number, or Naturalization/Certificate number.

¹ USCIS, “[USCIS Deploys Common Sense Tools to Verify Voters](#).” Published 5/22/2025. Accessed 5/28/2025.

² Institute for Responsive Government, “[The SAVE Act: How a Proof of Citizenship Requirement Would Impact Elections](#).” Published 1/30/2025. Accessed 5/28/2025.

³ USCIS, “[Voter Registration and Voter List Maintenance Fact Sheet](#).” Viewed 5/21/2025.

SAVE has not used Social Security Numbers to verify a person's U.S. citizenship in the past, and its accuracy and operational effectiveness are unknown.

- **Staffing Manual Verification for Increased Usage:** Like most government operations, the success of this project overall may partially rely on adequate funding and resources. In its most recent rigorous review of SAVE, the Government Accountability Office (GAO) found a meaningful portion — 15-19 percent⁴ — of SAVE queries before this change required additional verification steps, often requiring USCIS staff members to check files manually. In addition to highlighting the incompleteness of data records, this also raises questions about USCIS staff capacity to perform additional verification steps when needed. The announcement also notes new batch functionality that could create more demand on staff time. SAVE had required states to submit information about one person at a time for verification purposes. The announcement also highlights that SAVE now includes a new "bulk upload"⁵ feature that would allow states to upload up to 1GB of data⁶ for SAVE verification and create individual verification cases en masse. If a state uses the bulk upload feature to verify its entire voter file and a meaningful portion still requires manual checks, USCIS will require additional resources to conduct these checks.

PROCEED WITH CAUTION

As new sources of data emerge, election officials should proceed carefully. Data of unknown or unverified quality must not be used to initiate voter removals without strict adherence to all safeguards in state and federal law. As we learn more about this new system, we would recommend that state elections officials:

- **Test the new verification tool.** State elections officials should work closely with USCIS to develop a comprehensive series of tests that ensures the system:
 - Does not inaccurately reject individuals that elections officials know to be U.S. citizens;
 - Follows secondary verification steps for individuals whose records have not been uploaded electronically or the verification check is otherwise inconclusive;
 - Is updated regularly, and verifies U.S. citizenship for individuals who recently completed their naturalization process; and
 - Effectively flags fabricated test records (outlined below) created by elections officials to ensure inaccurate records are caught.
- **Submit a "test batch" of records that includes:**
 - **Confirmed U.S. citizen records:** States should submit individuals the state knows to be U.S. citizens (because the voter submitted proof of identity documents that confirm U.S. citizenship — like a U.S. Passport or U.S. birth certificate — to election officials or the state's motor vehicle agency); and
 - **Fabricated non-U.S. citizen test records:** States should submit records created by state elections officials that would not match existing USCIS records. This testing process allows state elections officials to gauge the new tool's ability to accurately and consistently confirm known U.S. citizens, and to evaluate the potential for false negatives due to incomplete databases or ineffective match

⁴ U. S. Government Accountability Office, "[Immigration Status Verification Benefits: Actions Needed to Improve Effectiveness and Oversight](#)," Table 1. Published March 2017. Accessed 5/23/2025.

⁵ USCIS, "[Optimizing SAVE: New Options to Create Cases with a Social Security Number and by Bulk Upload](#)." Accessed 5/28/2025.

⁶ USCIS, "[SAVE Bulk Uploader](#)." Accessed 5/28/2025.

processes. Using fabricated records to mimic ineligible individuals would also gauge the tool's ability to flag inaccurate records, while ensuring that any testing process does not put non-U.S. citizen residents at risk.

- **Use in limited circumstances.** At least initially, state elections officials should use this new tool in limited circumstances as its accuracy and effectiveness are being determined. This could include verifying voter registration records where a proof of identity document wasn't presented at the DMV or other state agency, or where a quick review is needed (like same-day registration).
- **Conduct significant outreach and due diligence as part of any cure process.** If any voter registration records are flagged as ineligible, state officials should provide ample opportunity for the individual to provide proof of U.S. citizenship: proactively reaching out via mail and email/text (if available) after test results are returned, and allowing proof to be provided during the next election to reactivate their voter registration.

BOTTOM LINE

We applaud efforts to upgrade our digital infrastructure to modernize election administration. But those efforts must be thoughtful. Taxpayer resources shouldn't be wasted chasing leads from bad data. And no eligible voter should be stripped of their fundamental right to vote due to flawed or incomplete data.

In Context

Database verification has been used for 15 years to verify U.S. citizenship for Medicaid. In 2009, the Children's Health Insurance Program Reauthorization Act⁷ (CHIPRA) gave states the option to drop their document-based proof of citizenship requirements and instead use Social Security Administration (SSA) data to verify an applicant's citizenship. Within the first year of the policy being implemented, states were already reporting successful match rates of between 93 and 99 percent and one state anticipated saving up to \$26 million annually in administrative costs.⁸

Database verification of voters has long been the standard of our global peers. The U.S. operates an unusually decentralized and inconsistent patchwork of voter databases. This complicates states' efforts to verify eligibility and track voters who move across state lines. Many advanced democracies — including Australia, Canada, and Germany — use centralized national systems to track and automatically register eligible voters. These models allow for seamless verification without burdening voters with bureaucratic red tape.

In all cases, databases only help if they are accurate, well-tested, and well-resourced. If not, they merely gum up the works and waste taxpayer resources. It's important to take the time to get it right.

⁷ Children's Health Insurance Program Reauthorization Act Of 2009, Pub. L. No. 111-3 Stat. 123 Stat. 8 (2009).

⁸ Ross DC. [New Citizenship Documentation Option for Medicaid and Chip Is Up and Running | Center on Budget and Policy Priorities](#). Published April 20, 2010. Accessed May 21, 2025.