



**SCHOLARS**  
STRATEGY NETWORK

## Petition of America First Legal Foundation for Rulemaking

**Rachael V. Cobb**, Suffolk University

I oppose the proposed change to add citizenship documentation as a requirement for voter registration.

I am a political scientist specializing in election administration and voter participation. Political science research demonstrates that voter registration itself is a substantial barrier to voting. When the costs of registration are raised, the probability of participation diminishes. Citizenship is already a requirement for voting. Citizenship is already a legal requirement for voting. Requiring additional citizenship documentation imposes further costs and administrative burdens, which could disproportionately reduce voter turnout and participation. Simply put, adding this requirement will most certainly disenfranchise eligible voters.

Requiring this additional administrative layer addresses a non-existent problem. According to the [Center for Election Innovation & Research](#), which compiled a comprehensive list of allegations of noncitizen registration and voting, found that, “the vast majority of allegations of noncitizen registration or voting appear to arise from misunderstandings, mischaracterizations, or outright fabrications about complex voter data.” At the end of the day, the number of claims themselves are “vanishingly small,” and, when such claims are substantiated, election officials take swift corrective action. Existing safeguards are effective in maintaining election integrity.