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RE: Election Assistance Commission, “Petition of America First Legal Foundation for Rulemaking”

Dear Election Assistance Commission:

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.

In public policy decisions we must balance access with integrity. Imposing unnecessary barriers, burdens, and administrative steps diminishes the ability to eligible voters to exercise the most fundamental, basic expression of political voice: the vote.

According to the 2024 Survey of the Performance of American Elections (SPAEE), just over half of registered voters possessed a passport; and of those 13% stated their passport was expired; another 2% indicated it did not have their legal name. Importantly, these are people who are already registered (Stewart 2025).

Passport possession correlates with income and education levels—those with higher income and education are more likely to hold passports, and Democratic voters are nine percentage points

more likely to have passports than Republicans, according to the Survey of Political Attitudes and Engagement (SPAЕ).

Although more respondents were likely to have a birth certificate, this document is problematic for those who have changed their names. A 2023 report by the Pew Research Center found that 79% of married women changed their names upon marriage, with an additional 5% hyphenating their names (Lin 2023).

Obtaining government-issued identification is costly—not only in terms of the actual expense but also regarding the time and resources required to acquire it. These barriers disproportionately impact communities facing economic or logistical challenges.

State election officials already use sophisticated systems to verify each individual voter’s eligibility and maintain accurate, up-to-date voter rolls. These processes are designed to uphold the integrity of elections while facilitating accessible voting for all eligible citizens.

Imposing more requirements such as documentary proof of citizenship creates significant barriers, especially for certain communities of eligible voters. For example, military personnel stationed overseas or away from their permanent residency may lack readily available documentation; families affected by natural disasters might have lost or destroyed vital records in the chaos; and many Americans who have changed their names—such as married women or individuals who have undergone legal name changes—may face difficulties in providing the necessary proof.

Mandating additional documentation in these cases risks disenfranchising legitimate voters, undermining the principles of fair and accessible elections, and placing an unnecessary burden on those who have already endured extraordinary circumstances.

Sincerely,

Rachael Cobb

## References

Lin, Luona. 2023. “About Eight-in-Ten Women in Opposite-Sex Marriages Say They Took Their Husband’s Last Name.” *Pew Research Center*, September 7. <https://www.pewresearch.org/short-reads/2023/09/07/about-eight-in-ten-women-in-opposite-sex-marriages-say-they-took-their-husbands-last-name/>.

Stewart, Charles. 2025. “2024 Survey of the Performance of American Elections.” Harvard Dataverse. <https://doi.org/doi:10.7910/DVN/GWBAP5>.

“Review of Allegations of Noncitizen Registrants and Voters.” *The Center for Election Innovation & Research*. <https://electioninnovation.org/research/noncitizen-analysis/>.