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GOVERNMENT LISTS:
HOW READY ARE THEY
FOR AUTOMATIC
REGISTRATION?

Laura Seago

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This is one in a series of papers on Voter Registration Modernization. The first, *Voter Registration Modernization*, sets forth more detailed policy arguments in favor of modernizing America's voter registration system and is available at www.brennancenter.org/VRM.

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INTRODUCTION

This paper provides information on five categories of government lists that may be used for the purpose of automatically registering eligible citizens to vote: (1) state department of motor vehicles databases; (2) state social service databases; (3) other state lists covering low-income citizens; (4) lists of recipients of state and federal disability benefits; and (5) federal government lists. The lists discussed in this document have some or all of the data elements necessary to register voters; the capacity to share data with other government entities; and, when taken together, the demographic coverage necessary to capture a large proportion of voting-eligible citizens.

I. DEPARTMENT OF MOTOR VEHICLES DATABASES

All state departments of motor vehicles maintain information about driver's license and non-driver ID applicants in electronic databases that share a core set of data elements essential to voter registration, and that have the demonstrated capability to share information with other government databases.

A. Data Elements

All state department of motor vehicles driver's license/non-driver ID databases have the following data elements relevant to universal voter registration: (1) full name; (2) date of birth; (3) address; (4) a unique driver's license/ID number; and (5) Social Security number.¹ The American Association of Motor Vehicle Administrators (AAMVA), of which all 50 states and the District of Columbia are members, sets minimum standards for the data elements collected from driver's license and ID applicants.²

1. Citizenship Information

A sixth data element essential to voter registration is citizenship status. All states issue driver's licenses to at least some noncitizens, though the prevailing model is for states to restrict the issuance of driver's licenses to citizens and lawfully present immigrants.³ A total of forty-seven states and the District of Columbia have such a restriction; thirty-two states⁴ have a legal requirement that applicants must prove that they are citizens or lawfully present immigrants before receiving a driver's license or non-driver ID, and the other fifteen states⁵ and the District of Columbia have a de facto lawful presence requirement created by requiring applicants to provide identity documents only available to citizens and lawfully present immigrants. Three states, Hawaii, New Mexico, and Washington, do not require lawful presence information from driver's license applicants.

In many of the states with the legal or de facto lawful presence requirements described above, the department of motor vehicles requires separate forms of documentary proof of identity or lawful presence from citizens and noncitizens. Fifteen states⁶ require citizens to present documents that affirm their citizenship, such as a U.S. passport, naturalization certificate, or U.S. birth certificate. These states do not allow citizens to present documents like Social Security cards or military IDs, which are available to both citizens and lawfully present immigrants. At least eight additional states⁷ require motor vehicle administrators to indicate the documents provided by applicants to prove legal status on the application or in a searchable field of the department of motor vehicles database, which agencies could potentially use to sort out applicants who presented documents available to citizens only.

Other states collect citizenship information in other ways. Twenty-two states⁸ and the District of Columbia require driver's license applicants or the DMV clerk to check a box on the application form or in the computerized application system to indicate the applicant's citizenship status; seven of those states also require citizens to provide documentation affirming their citizenship status.⁹

In order to automatically cull lists of voting-eligible citizens from driver's license and non-driver ID lists, states must not only collect citizenship information; they must also retain it in an electronic format. The Brennan Center's research on the architecture of state department of motor vehicles databases is extremely preliminary, but we have established that at least eleven state¹⁰ driver's license and non-driver ID databases do have a citizenship data element or a searchable field that indicates the form of documentary proof presented by applicants.

In total, thirty states and the District of Columbia collect citizenship information from driver's license applicants.¹¹ See the chart and map attached as Appendices A and B, respectively, for more detail.

B. Database Architecture

Every state's department of motor vehicles database is different, but national trends in database design provide a general outline of the structure of most driver's license/non-driver ID databases. According to the American Association of Motor Vehicle Administrators (AAMVA), most states¹² are currently in the process of replacing aging legacy systems with new, customer-centric databases that link all department of motor vehicle records – not just licensing information, but also automobile titles and other services provided by the department – to individuals.¹³ While some states¹⁴ have attempted to build databases based on other states' systems, most states have elected to work with third-party vendors¹⁵ to build customized systems.¹⁶ That states are currently in the process of updating their motor vehicles databases may facilitate the transition to a modernized voter registration system in two ways. First, states that are in the process of updating their databases can easily build in features that make it easier to collect, share, and update the data necessary to register voters, and second, the new systems to which most states are migrating are more easily modified to include new data elements and capabilities,¹⁷ making it easier to alter preexisting databases to accomplish these objectives.

C. Data-Sharing Capabilities

Through AAMVA, state departments of motor vehicles can already share information from their driver's license and non-driver ID databases to a variety of other government agencies. As mandated by the Help America Vote Act, every state department of motor vehicles driver's license database can share information with voter registration databases for the purposes of

verifying voter identity. Every state department of motor vehicles currently uses AAMVA's Help America Vote Verification application, which allows motor vehicle administrators to submit voter registration records from election authorities to the Social Security Administration to match registrant data to Social Security records. AAMVA also offers an Electronic Verification of Vital Events Records application, which allows motor vehicle administrators to verify information on birth certificates provided by applicants as proof of identity. Both of these examples involve bidirectional communication between the department of motor vehicles and the other agency's database.

State departments of motor vehicles share information with other government agencies in much the same way they would with state elections authorities under a system of voter registration modernization. Thirty-seven states and the District of Columbia automatically transfer information on males between the ages of 18 and 25 to the Selective Service System when the department updates those individuals' records in the driver's licensing database.¹⁸ In a handful of states,¹⁹ men have the freedom to choose whether they are automatically registered, and the Department of Motor Vehicles does not send their information to the Selective Service System unless they check a box indicating their consent.

Automatic Selective Service registration is managed through an AAMVA program called the Selective Service Registration Application, which automatically sends data on eligible males from the state department of motor vehicles to the Selective Service System.²⁰ The software sends information to the Selective Service System by way of AAMVA's Unified Network Interface, which edits driver's licensing data to isolate the data elements used in Selective Service Registration, puts the information in the proper format, and forwards it directly to the Selective Service System's registrant database.²¹ Individuals who are not in the Selective Service System registrant file are automatically registered; if an individual is already in the database, the system automatically updates his address information if necessary.²² After this transaction, the AAMVA software returns either a confirmation message or an error message to the department of motor vehicles.²³ This data transfer is unidirectional; departments of motor vehicles cannot access Selective Service System data.

Most states also have internal data sharing programs that allow the department of motor vehicles to share information from its database with other government agencies for purposes such as law enforcement and summoning residents from jury duty.²⁴ Some states also have driver's licenses databases that are already integrated with their voter registration databases.²⁵

II. SOCIAL SERVICE DATABASES

State social service agencies are responsible for determining eligibility for public benefits like the Supplemental Nutrition Assistance Program (SNAP or food stamps), Temporary Aid for Needy Families (TANF), Medicaid, state-based General Assistance, and other benefits. These programs cover over 60 million people nationwide, many of whom may not be included on driver's license databases or other lists. States manage these programs using computerized constituent databases, which typically include clients of several different programs. These databases contain the essential data elements necessary for voter registration and already possess the capacity to share information electronically with other state and federal government agencies.

A. Data Elements

All social service databases administering the programs with the greatest population coverage (TANF, Food Stamps, and Medicaid) contain the following data elements for program beneficiaries: (1) full name; (2) date of birth; (3) address;²⁶ (4) Social Security number; and (5) citizenship information.

1. Citizenship Information

Social service agencies collect citizenship information in a variety of different ways. Under the 1996 welfare reforms, agencies are required to determine the citizenship and immigration status of applicants for virtually all federal public benefits.²⁷ According to guidelines issued by the Department of Justice, states may collect this information either by requiring applicants to submit documentary proof of citizenship or by asking applicants to sign a declaration affirming their citizenship under penalty of perjury.²⁸ A later federal law further required that Medicaid applicants show documentary proof of citizenship.²⁹ For TANF and food stamps, most states employ the written affirmation, but a small number of states do require documentary proof of citizenship for these programs as well.³⁰

While the Brennan Center has determined that all state social service agencies that administer these benefits collect citizenship information from beneficiaries, we are still working to confirm that all states include this information in their databases.³¹ Because states do collect this information during the application process and the rules of some programs administered in unified multiprogram databases do require administrators to retain this information electronically, we have reason to believe that citizenship information is almost universally included. For example, the federal rules governing state administration of Medicaid – a benefit that is often administered using databases that also contain client information for other programs – require that states retain citizenship information in their Medicaid databases.³² Given that most states integrate the management of Medicaid, food stamps, and TANF into a single database (as detailed below) and that food stamps and TANF applicants must establish

citizenship during the application process, it is highly likely that most, if not all, social service databases contain this information.

B. Database Architecture

All state social service agencies use electronic databases to manage beneficiaries of public assistance programs. While social service agencies typically have several databases devoted to managing their clients, almost all states have one or more unified databases that either jointly manage eligibility for several major federal programs or that compile clients from individual program databases into a master list. These unified databases contain all of the personal information necessary to register all eligible people in the database to vote. While specific database architecture varies from state to state, federal standards have laid the groundwork for a common statewide, multiprogram database structure.

1. Unified Databases

As a result of these federal guidelines and a nationwide trend toward unified applications for TANF, food stamps, and Medicaid, the vast majority of states have elected to manage applicants for benefits from these three programs (at minimum) in a single database. A total of 45 states and the District of Columbia have such integrated databases. See the chart attached as Appendix C for more detail.

2. Disaggregated Databases

A few states³³ lack the unified databases described above. In these states, the most common model is to have one database that manages cash and nutritional assistance programs like TANF and food stamps, and a second database that manages health assistance programs like Medicaid. In all cases except one,³⁴ these databases are nevertheless statewide and would only require one additional data transfer to achieve the same voter registration effect as a state with a fully unified database.³⁵ See the chart attached as Appendix C for more detail.

3. Federal Standards

The federal government has encouraged the development of statewide computerized databases to track state recipients of aid since the early nineties, as a way to cut down on perceived inefficiency and fraud in the system. By creating national standards for database design and encouraging states to administer several key social service programs in a single unified database, these efforts may facilitate the use of these databases for voter registration.

In 1992, the federal government offered a 50% reimbursement to state public assistance agencies that developed statewide computerized databases that met federal “Family Assistance Management Information Systems” (FAMIS) standards set by the Department of Health and

Human Services.³⁶ Because of the structure of program eligibility and requirements for FAMIS certification, most FAMIS-certified databases covered AFDC, food stamps, and Medicaid recipients.³⁷ By the time the program ended (concurrently with the enactment of welfare reform in 1996), thirty eight (38) states had FAMIS-certified databases.³⁸

Similarly, the Omnibus Budget Reconciliation Act of 1993 offered increased child welfare funding under Title IV-E of the Social Security Act to states that implemented a SACWIS, or a Statewide Automated Child Welfare Information System.³⁹ States that accept SACWIS funding must create an automated statewide database that maintains client information for all programs related to child support services, including family assistance programs such as TANF and food stamps.⁴⁰ According to the Department of Health and Human Services, each state's SACWIS must hold "a complete, current, accurate, and unified case management history on all children and families served by the [funding recipient] State agency."⁴¹ Currently, forty (40) states and the District of Columbia have accepted SACWIS funding; twenty-seven (27) of which have fully operational systems⁴² and fourteen (14) of which are in the process of developing SACWIS-compliant databases.⁴³

Regardless of their use of SACWIS or FAMIS funding, all states are required to have Medicaid Management Information Systems (MMIS) that conform to certain federal standards.⁴⁴ A majority of states have integrated these systems with or linked them to other benefits eligibility databases. The Federal Centers for Medicare and Medicaid Services dictate the guidelines for MMIS systems and provide states with technical assistance to develop and maintain their systems.⁴⁵

The USDA Food and Nutrition Service also provides extensive technical assistance to help states upgrade and maintain information systems that manage food stamps and Women, Infants, and Children (WIC) eligibility. Like the Centers for Medicare and Medicaid Services, the Food and Nutrition Service promulgates system security requirements, though its other guidelines for state databases are not binding requirements, but instead models for best practices.⁴⁶

C. Data-Sharing Capabilities

Public assistance agencies in Forty-nine states, the District of Columbia, and Puerto Rico already have the capability to share information contained in their benefit recipient databases with other government agencies through a federal data sharing program called the Public Assistance Reporting Information System (PARIS). PARIS helps to identify individuals with the same Social Security number to aid caseworkers in eligibility determination by identifying clients who may receive benefits in more than one state or who may receive benefits that were not reported to the caseworker. The only state that does not participate is Hawaii, likely due to policy preferences rather than technical capability.⁴⁷

PARIS is a federal data sharing program through which states send information to the Social Security Administration (SSA), which in turn transmits data to federal databases that contain benefit eligibility information. The PARIS system also conducts quarterly matches of each state's submitted public assistance data. This interstate matching program applies to TANF, Medicaid, food stamps, Supplemental Security Income (SSI), and other public assistance programs covered by the databases in question.⁴⁸

The SSA does not process or access any PARIS data; it simply serves as the link between state databases, which are already connected to the SSA, and other databases that are not directly connected to the states.⁴⁹ States have access to the SSA database through a software program called Connect: Direct, which functions similarly to a file transfer protocol in that states upload their files to the program, which encrypts the data for security purposes and then transmits it to the SSA.⁵⁰ The file transfer process is not continuous as states update the information in their databases; states must upload their information during scheduled PARIS updates that occur four times a year.⁵¹

State social service agencies also participate in other database matches. The SSA has a memorandum of understanding with every state regarding the operation of the Beneficiary Earnings and Data Exchange (BENDEX) and State Data Exchange (SDX) matching programs, which allow states to share eligibility and benefits information with the SSA and with other state social service agencies, respectively.

D. Programs Covered by Social Service Databases

While the databases discussed in this section do not cover all social service programs, they do cover a significant portion of public assistance recipients. The following is a brief overview of the major programs covered by all statewide public assistance databases.

1. Food Stamps

Households with a gross monthly income of up to 130% of the federal poverty line qualify for food stamps under the Supplementary Nutritional Assistance Program (SNAP).⁵² As of 2008, the program served 28,408,010 individuals nationwide; approximately half of these beneficiaries were voting-age adults.⁵³ The Department of Agriculture's Food and Nutrition Service estimated in 2006 that about 73.1 percent of the population living below the poverty line participated in the program. About 80 percent of food stamps recipients also receive other government benefits such as TANF, Social Security, SSI, and general assistance.⁵⁴

2. Medicaid

All states are required by federal law to make Medicaid available to the “categorically needy,” which includes individuals who meet TANF requirements, pregnant women and children under 6 whose family income is less than 133% of the federal poverty line, children 6 to 19 whose income is less than 100% of the poverty line, caretakers of children under the age of 18, individuals who qualify for Supplemental Security Income or state disability benefits, and individuals living in medical institutions with incomes under 300% of the SSI income standards.⁵⁵ Many states also elect to provide additional benefits to the medically needy and special groups, which include individuals like full-time students up to age 21, people over the age of 65, and the working disabled.⁵⁶ Recent figures indicate that Medicaid provides health coverage for about 60 million people nationwide, about half of whom are voting-age adults.⁵⁷

3. TANF

The federal government provides TANF block grants to each state, and each state in turn determines eligibility guidelines for program beneficiaries.⁵⁸ While the federal government sets basic standards for TANF eligibility – such as requiring that recipient families include at least one child or pregnant person – income and other eligibility guidelines vary from state to state.⁵⁹ State income thresholds (the maximum monthly amount that a family can make and still receive TANF) vary widely, from \$215 in Alabama to \$2,758 in New Hampshire.⁶⁰ As of 2002, about 2 million families, including roughly 5.4 million individual beneficiaries, of who about a quarter are voting-age adults, received TANF benefits.⁶¹ As of 2002, about 81 percent of TANF recipients also received food stamps, and 99.6 percent of TANF recipients also received Medicaid.⁶²

III. OTHER STATE-ADMINISTERED LISTS

While food stamps, Medicaid, and TANF are the programs most commonly covered by unified social service databases, some states administer other programs, such as supplementary Supplemental Security Income (described in further detail below), home energy assistance, and state-based general assistance using these databases. While some lists are likely to be more easily applied to voter registration than others, most of these lists contain the data elements necessary for voter registration, and some are administered by the same state agencies that administer TANF, food stamps, and Medicaid benefits.

A. General Assistance

“General Assistance” is an umbrella term for state-based public assistance programs that usually provide aid to individuals who do not qualify for federal benefits. Administered at the state level, general assistance programs vary in target audience, form of relief provided, eligibility requirements, and number of initiatives in a single state. Because these lists vary state-to-state, it is difficult to make general statements about the information collected or if and how authorities identify immigrants. As of 1998, 24 states had statewide General Assistance programs. Lists of General Assistance program participants may prove a valuable resource in these states, particularly because states typically provide this benefit to individuals who do not qualify for federal benefits, including those who do not qualify because their income exceeds federal threshold levels.⁶³

B. Unemployment Insurance

Another program of particular interest (especially given the current economic climate) is Unemployment Insurance. Each state administers Unemployment Insurance benefits following guidelines set by the federal government. While more research is necessary, we have reason to believe that state unemployment lists contain the data elements necessary for voter registration. For example, the Social Security Act mandates that each state require a written declaration from applicants stating that the individual is a citizen or national or is of satisfactory immigration status to receive unemployment benefits.⁶⁴ Instructions issued by the Department of Labor clarify that applications must include a “yes or no” question about citizenship.⁶⁵

C. Women, Infants, and Children (WIC)

Through WIC, the federal government provides grants to states for initiatives that provide supplementary food and nutrition education to pregnant and postpartum women, infants, and children up to their 5th birthday. State WIC agencies administer the program, and each maintains their own database of participants.⁶⁶

To receive WIC, beneficiaries' gross incomes must fall below 185 percent of the federal poverty line.⁶⁷ In 2008, WIC reached about 8.4 million individuals nationwide, and just under a quarter of WIC beneficiaries are voting-age women.⁶⁸ About two thirds of WIC recipients receive public assistance from another program; 63.2 percent of WIC recipients receive Medicaid, 21.8 percent receive SNAP benefits, and 9.3 percent receive TANF aid.⁶⁹ The federal government allows local WIC administrators to decide whether to restrict WIC to citizens and lawfully present immigrants.⁷⁰ Most WIC agencies decline to collect information or restrict benefits based on immigration status.

D. Low-Income Home Energy Assistance Program (LIHEAP)

LIHEAP is block grant program through which the federal government allocates funding to states for projects related to energy assistance, such as assistance to low-income people in paying heating and cooling bills, weatherization projects, services to reduce the need for energy assistance, and emergency energy needs.⁷¹ Although states frequently disburse LIHEAP benefits through local agencies, overall program administration and the maintenance of recipient files take place at the state level. An estimated 5.3 million households received LIHEAP assistance in fiscal year 2005.⁷² While applications and benefits are by household, applications typically require beneficiaries to list everyone living in the home, and often include those individuals' social security number, date of birth, and citizenship information.

E. Section 8

Section 8 is a federal program administered through the office of Housing and Urban Development (HUD), with disbursement of benefits administered by local officials.⁷³ Local public housing authorities apply for an allotment of Section 8 vouchers from HUD, which they then disburse to families who qualify for program benefits under federal guidelines.

Income requirements for the Section 8 program vary widely based on the median income in the locality in which an individual applies.⁷⁴ As of 2004, approximately 2.1 million households received section 8 vouchers, each of which translates to at least one voting age adult.⁷⁵ Housing agencies request standard information during the application process, including date of birth and social security number for all family members.⁷⁶ Local housing agencies must enter all application information into the Department of HUD's "Multifamily Tenant Characteristics System" (MTCS) database.⁷⁷ Section 8 applicants are required to submit proof of citizenship or eligible immigration status at the time of application.⁷⁸ Local housing authorities must verify immigration information using a software program developed by Immigration and Naturalization Services.⁷⁹

F. Homeless Management Information Systems

Many states maintain state-level Homeless Management Information System (HMIS) software designed to track the characteristics and needs of homeless individuals. While HMIS is not linked to any federal program, The U.S. Department of Housing and Urban Development (HUD) has developed a HMIS technical assistance initiative designed to help localities who wish to adopt such a system to comply with a congressional directive mandating that localities collect data on the homeless populations they serve.⁸⁰ The most common implementation of the HMIS database involves local databases in large metropolitan areas and a “balance-of-state” database that covers all other localities.⁸¹ Service providers who come into contact with homeless people automatically input client information into the local HMIS.⁸²

Nationwide, HMIS datatypes covered about 1.6 million people who used an emergency shelter or transitional housing facility in 2007.⁸³ All implementations of HMIS conform to federal standards for data collected, and include the name, date of birth, and social security number of each individual in the database.⁸⁴ Service providers who interact with homeless people enter all clients into the HMIS, regardless of immigration status. While citizenship information is not a minimum data element required by HUD, many localities include citizenship information in their HMIS databases.⁸⁵

IV. LISTS COVERING DISABLED INDIVIDUALS (FEDERAL AND STATE)

Like the low-income individuals covered by the public assistance lists described above, people with disabilities are less likely to be included on driver's license lists. As such, lists of disability benefit recipients are necessary to ensure that all Americans are registered under a system of automatic voter registration. The following state and federal lists cover recipients of disability benefits. Most of these lists contain the information necessary for voter registration and are maintained in electronic databases with sharing capability.

A. Supplemental Security Income

Supplemental Security Income (SSI) is a federally administered program that provides permanent income for older, blind, and disabled people. The Social Security Administration collects all data elements essential to voter registration, and records SSI recipients' citizenship information in the "alien indicator code" of its database.⁸⁶ As of 2008, individuals could qualify for SSI only if they made less than \$657 in unearned income or \$1359 in earned income per month.⁸⁷ As of March 2009, 7.6 million people received state and/or federal SSI benefits, 85 percent of whom are voting-age adults.⁸⁸

The Social Security Administration administers the application process and disbursement of funds for SSI, although most states also offer supplementary payments that the state administers either on its own or in conjunction with the Social Security Administration.⁸⁹ In states that administer their own supplementary support, the state department of human services is typically responsible, although county authorities also administer the program in some states.⁹⁰ While everyone must apply for SSI benefits through federal Social Security Administration field offices, individuals applying for supplementary support in states that self-administer the program must apply separately through the agency that administers supplementary payments.⁹¹

Even in states that do not self-administer their own supplementary SSI payments, state agencies are involved in program implementation through "Disability Determination Services" (DDS), state agencies charged with following up on applications for SSI benefits to verify a beneficiary's eligibility. When the Social Security Administration accepts an application for SSI benefits, it puts all of the applicant's information into a computerized system called the Disability Determination File, to which state DDS agencies have some limited access.⁹²

B. Disability Insurance

Social Security Disability Insurance (SSDI) is a federal disability benefit that differs from SSI in that recipients must have worked and paid social security taxes for a certain period of time, usually 40 quarters, 20 of which must have occurred within the past 10 years.⁹³ In some cases, the spouses and children of SSDI beneficiaries qualify for benefits as well. Like Supplemental Security Income, Social Security Disability Insurance is administered through the Social Security Administration, with assistance from state Disability Determination Services agencies.⁹⁴ The application for SSDI benefits includes information about date of birth, Social Security number, and citizenship status.

The qualifying standards for SSDI are essentially the same as those for SSI with the exception of the work requirement described above. In 2007, about 8.1 million people received SSDI benefits, 80 percent of whom were voting-age adults.⁹⁵

C. Medicaid

In the 18 years between 1984 and 2002,⁹⁶ SSI recipients' participation in Medicaid fluctuated between 96 and 100 percent.⁹⁷ Given that Medicaid information is already in a format that would easily facilitate the transfer of beneficiary data to the state election authority, it may be unnecessary to transfer SSI beneficiary information separately.

D. Medicare

Medicare is a government-run health insurance program available to people over the age of 65, people under 65 with certain disabilities, and people with kidney failure requiring dialysis. Unlike Medicaid, the federal government administers Medicare. States have no role in collecting patient information or disbursing benefits. The Social Security Administration administers the Medicare database, known as the MDB file.⁹⁸ The MDB file contains information on beneficiaries' Social Security numbers, dates of birth, and addresses.

As of 2003, Medicare had about 41.8 million beneficiaries, 85.6 percent of whom were over the age of 65.⁹⁹ The remaining 14.4 percent were disabled individuals of indeterminate age.¹⁰⁰ The overlap between Medicare and Medicaid recipients is relatively small; only 17.8 percent of Medicare recipients also receive Medicaid.¹⁰¹ In addition to serving as a valuable source of information on disabled individuals, Medicare is likely the best source of information on potential voters over the age of 65.

E. Workers' Compensation

State agencies oversee each worker's compensation program, with the exception of special programs for dock workers and coal miners that are administered by federal agencies.¹⁰² While states vary in the structure of their worker's compensation programs, any individual who suffers a work-related injury is entitled to compensation paid by the employer, and dependents of individuals killed in a work-related accident receive similar compensation for a limited time.¹⁰³ While state worker's compensation forms vary, most or all seem to collect social security numbers and dates of birth.¹⁰⁴ Most or all worker's compensation applications for assistance do not ask for citizenship information.¹⁰⁵

The Bureau of Labor statistics reports that over 1.15 million people suffered injuries that led to time away from work and 5,488 people died in workplace accidents in 2007. All of these individuals (or, in the case of death, their dependents) are likely captured on state worker's compensation databases.

F. Paratransit

Paratransit is a government-funded transportation service that allows disabled individuals who cannot easily drive or use public transportation to travel by chauffeured vehicle. Because they often work, Paratransit users are less likely than other disabled individuals to receive benefits like SSI or SSDI that are predicated on a lack of gainful employment.

G. Libraries for the Blind and Physically Disabled

The federal government administers a national network of libraries for the blind and physically disabled that send Braille and audio materials to eligible individuals.¹⁰⁶ The mailing list for this system or for libraries within this system may be another source of disabled individuals who do not appear on other program lists.

V. OTHER FEDERAL LISTS

Several federal programs maintain databases that contain information on the names, dates of birth, mailing and street addresses, and often the citizenship status and unique identifiers (such as Social Security numbers) of potential voters. The following is an overview of some key lists maintained by the agencies charged with administering these programs. Each list may be useful in a particular aspect of voter registration; the United States Citizenship and Immigration Services' list of new citizens may be a good source of information for newly naturalized citizens; the Free Application for Federal Student Aid list may help register young voters; and the United States Postal Service and the Internal Revenue Service may be able to provide lists that are useful for address updating purposes.

A. United States Citizenship and Immigration Services

United States Citizenship and Immigration Services (USCIS) issues a unique, nine-digit identification number, called an "alien registration number" or "A-number," to every foreign national who is admitted to the United States or involved in an immigration enforcement or other law enforcement proceeding.¹⁰⁷ For every person that has been assigned an A-number, USCIS maintains an "A-file," which includes the person's name, date and country of birth, and class of admission.¹⁰⁸ That A-file also contains a Naturalization Certificate Number, SSN, and driver's license number if that information is applicable and available.¹⁰⁹ Information from each A-file is included in the Department of Homeland Security's electronic Central Information System (CIS).¹¹⁰

B. Free Application for Federal Student Aid (FAFSA)

According to the Department of Education, in the calendar year 2005, 12.7 million students filled out a Free Application for Federal Student Aid (FAFSA), which accounts for almost three quarters of the total post-secondary student population for that year according to U.S. Census estimate estimates.¹¹¹ The Department of Education maintains information on all FAFSA applicants in a database called the Federal Student Aid Application File, which includes applicant names, addresses, birth dates, and Social Security Numbers.¹¹² The Department of Education also collects and stores citizenship information on FAFSA applicants.¹¹³

C. United States Postal Service

The United States Postal Service (USPS) maintains a considerable amount of information on the addresses of U.S. citizens through its National Change of Address (NCOA) database, which includes self-reported information on individuals who move, and its Delivery Sequence File (DSF), a computerized database of all delivery addresses.¹¹⁴ Some state elections officials

currently use information from the NCOA database to help update and maintain their elections rolls.¹¹⁵

D. Social Security Administration

The Social Security Administration's "Master Files of Social Security Number (SSN) Holders and SSN Applications" retains information on all persons who have applied for a Social Security number at some point in the past. The database contains all of the information from the original SSN application, including name, date and place of birth, both parents' names and SSNs, as well as the supporting documentation that the applicant provided to prove eligibility to receive an SSN (which includes information on citizenship status).¹¹⁶ It does not, however, include any address information for those who are not Social Security beneficiaries.¹¹⁷ In sending yearly Social Security Statements, the Social Security Administration uses the last known address acquired from the IRS.¹¹⁸

E. Internal Revenue Service

The most complete and accurate information the federal government maintains on the current addresses of U.S. citizens is likely the IRS database, which the IRS has been working to upgrade over the past eight years as part of its multimillion-dollar Business Systems Modernization initiative.¹¹⁹ Individuals self-report the information contained in this database on an annual basis with significant penalties associated with noncompliance. Individuals who qualify for tax refunds are additionally incentivized to report accurate address information.

F. U.S. Census Bureau

In preparation for the 2000 Census, the Census Bureau began to develop a nationwide list with the goal of locating the geographic location of all residences in the United States, which is called the "Master Address File" (MAF). The goal of the MAF is to document the street address (or some other equivalent location description), mailing address (if different from the street address), and census block location for every residence in the United States.¹²⁰ Where possible, the MAF includes the names and mailing addresses of occupants of each residence.¹²¹ Among the major sources of city-style addresses for Census 2000 was the USPS's Delivery Sequence File (DSF), which consists of all locations the USPS recognizes as a deliverable street address, and which accounts for the residences of approximately 80% of the U.S. population.¹²² The Census also partners with state, local, and tribal government entities, in order to share address data and locate residences that may be hard to find—according to the GAO, approximately half of the nearly 40,000 eligible governmental entities participated in the 2000 Census, and the Bureau is aiming to have 60% participation from these entities for the 2010 Census.¹²³

ENDNOTES

¹ The collection of Social Security numbers is mandated by 42 U.S.C. § 666 (a)(13). Given that the information contained within department of motor vehicles databases is associated with a unique driver's license or non-driver ID number, the Social Security number is essentially unnecessary for the purposes of voter registration, but this information is nevertheless available.

² See AAMVA UNIFORM ID SUBCOMMITTEE – UID7 TASK GROUP, AMERICAN ASSOCIATION FOR MOTOR VEHICLE ADMINISTRATORS, PERSONAL IDENTIFICATION – AAMVA INTERNATIONAL SPECIFICATION – DL/ID CARD DESIGN (March 2005).

³ See chart attached as Appendix A.

⁴ The states with a legal requirement are Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Florida, Georgia, Idaho, Indiana, Kansas, Kentucky, Louisiana, Maine, Maryland, Michigan, Minnesota, Mississippi, Missouri, Montana, New Jersey, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, South Dakota, Tennessee, Virginia, Vermont, Wisconsin, and Wyoming.

⁵ The states with a de facto requirement are Alaska, Delaware, Illinois, Iowa, Massachusetts, Nebraska, New Hampshire, Nevada, New York, North Carolina, North Dakota, Rhode Island, Texas, and West Virginia.

⁶ These states are Connecticut, Delaware, Florida, Georgia, Idaho, Maine, Michigan, Missouri, Montana, Oklahoma, Oregon, Pennsylvania, South Carolina, Wisconsin, and Wyoming.

⁷ These states are Colorado, Delaware, Hawaii, Indiana, Minnesota, Nevada, New York, and Virginia. An additional four states — Alabama, Kansas, Michigan, and North Carolina — include information about the form of documentary proof provided by applicants in their databases, but these fields are not searchable.

⁸ The twenty two states that have citizenship checkboxes on their driver's license application forms are Alaska, Arizona, Connecticut, Georgia, Idaho, Illinois, Iowa, Kentucky, Louisiana, Maryland, Mississippi, Montana, New Hampshire, Ohio, South Carolina, South Dakota, Tennessee, Texas, Vermont, West Virginia, Wisconsin, and Wyoming.

⁹ The states that require both documentary proof of citizenship and a citizenship checkbox on the driver's license application are Connecticut, Georgia, Idaho, Montana, South Carolina, Wisconsin, and Wyoming.

¹⁰ These states are Colorado, Delaware, Florida, Georgia, Idaho, Indiana, Iowa, Kentucky, Maryland, Minnesota, and Ohio.

¹¹ The seven states that the Brennan Center has confirmed do not require documentary proof of citizenship or ask for an applicant's citizenship status on a driver's license application are California, Maryland, Massachusetts, Nevada, New Mexico, Utah, and Virginia.

¹² States currently in the process of updating their databases includes Montana, Washington, California, New Mexico, Iowa, Michigan, Indiana, Texas, Arkansas, Minnesota, Virginia, Vermont, Kansas, and Idaho. Telephone Interview with Sheila Prior, Vice President, American Assn. of Motor Vehicles Region IV (Mar. 23, 2009) [hereinafter *Sheila Prior Interview*].

¹³ *Id.*

¹⁴ Montana and Iowa, for example, have both attempted to base their systems on other states' databases.

¹⁵ The number of vendors is relatively small — 5 or 6 vendors supply the vast majority of commercially available software. Sheila Prior Interview, *supra* note 13.

¹⁶ *Id.*

¹⁷ *Id.*

¹⁸ The 37 states with automatic registration laws that use the AAMVA software are Alabama, Arizona, Arkansas, Colorado, Delaware, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland, Michigan, Minnesota, Mississippi, Missouri, Montana, Nevada, New Hampshire, New Mexico, New York, North Carolina, Ohio, Oklahoma, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Utah, Virginia, West Virginia, and Wisconsin. Guam, the Commonwealth of the Northern Mariana Islands, the Virgin Islands, and the District of Columbia also use the software to conform with their own automatic registration laws. Laws Linking SSS Registration to State Driver's License Applications, <https://www.sss.gov/FSdrivers.htm> (last visited Jan. 29, 2009).

¹⁹ The states that allow applicants to opt in to or out of Selective Service registration are New Hampshire, New Mexico, South Dakota, Virginia, and West Virginia.

²⁰ AAMVA: Selective Service Registration, <http://www.aamva.org/TechServices/AppServ/SSR/> (last visited Jan. 29, 2009) [hereinafter *AAMVA*].

²¹ *Id.*; See also INTEGRATED JUSTICE INFORMATION SERVICES INSTITUTE, TECHNOLOGY ASSISTANCE REPORT: AMERICAN ASSOCIATION OF MOTOR VEHICLE ADMINISTRATORS 10 (Apr. 2006).

²² AAMVA, *supra* note 20.

²³ *Id.*

²⁴ Sheila Prior Interview, *supra* note 12.

²⁵ Michigan and Arizona have this structure, as may other states.

²⁶ Some states may only collect and maintain mailing rather than residential addresses, but research suggests that the majority of states do collect residential address information. See NANCY COLE, ABT ASSOCIATES, FEASIBILITY AND ACCURACY OF RECORD LINKAGE TO ESTIMATE MULTIPLE PROGRAM PARTICIPATION Table A-7 (2003) [hereinafter *Food Programs Feasibility Study*].

²⁷ 62 Fed. Reg. 61345 (Nov. 17, 1997).

²⁸ *Id.*

²⁹ Deficit Reduction Act of 2005 § 6036, 42 U.S.C. § 1396b(x) (2009).

³⁰ Kathy Barks Hoffman, *States Ask for Citizenship from Welfare Recipients*, Associated Press for USA TODAY, Jun. 25, 2008, available at http://www.usatoday.com/news/nation/2008-06-25-2495986492_x.htm.

³¹ The Brennan Center has thus far confirmed that 17 states include citizenship information in their databases of TANF and food stamp recipients. These states are Alaska, Arizona, Florida, Georgia, Indiana, Iowa, Maryland, Minnesota, Montana, Nebraska, New Mexico, New York, North Carolina, Ohio, Washington, Wisconsin, and Wyoming.

³² See 72 Fed. Reg. 38693 (Jul. 13, 2007).

³³ California, Louisiana, Missouri, North Carolina, and Oregon.

³⁴ California is an exception. While the state has a statewide Medicaid Management Information System (MMIS), its TANF and Food Stamps programs are currently administered through four "Automated Welfare Systems," each covering several counties. See History of SAWS, <http://www.c-iv.org/HistoryofSAWS.shtml> (last visited April 24, 2009).

³⁵ A second data transfer may not be necessary due to program overlap. For example, 99.6% of TANF recipients also receive Medicaid. UNITED STATES HOUSE COMMITTEE ON WAYS AND MEANS, 2004 GREEN BOOK: BACKGROUND MATERIAL AND DATA ON PROGRAMS WITHIN THE JURISDICTION OF THE HOUSE COMMITTEE ON WAYS AND MEANS (2004), 15-3 [hereinafter *Green Book*].

³⁶ See UNITED STATES GENERAL ACCOUNTING OFFICE, DETERMINING FINANCIAL ELIGIBILITY IS CUMBERSOME AND CAN BE SIMPLIFIED (Nov. 2001) at 30.

³⁷ See UNITED STATES GENERAL ACCOUNTING OFFICE, IMPROVING STATE AUTOMATED SYSTEMS REQUIRES COORDINATED EFFORT (Apr. 2000) at 19.

³⁸ *Id.*

³⁹ See 42 U.S.C. § 674(3)(C), (3)(D).

⁴⁰ See About SACWIS, <http://www.acf.hhs.gov/programs/cb/systems/sacwis/about.htm> (last visited April 24, 2009).

⁴¹ *Id.*

⁴² The states with fully operational SACWIS databases are Alaska, Arizona, Arkansas, Colorado, Connecticut, the District of Columbia, Delaware, Idaho, Indiana, Iowa, Kentucky, Massachusetts, Maine, Minnesota, Montana, Nebraska, New Mexico, New Hampshire, Nevada, Oklahoma, Rhode Island, South Dakota, Texas, Utah, Wisconsin, Wyoming, and West Virginia.

⁴³ The states that are in the development stages of their SACWIS projects are Alabama, California, Florida, Georgia, Louisiana, Maryland, Michigan, Missouri, New Jersey, Ohio, Oregon, South Carolina, Tennessee, and Washington.

⁴⁴ Social Security Act of 1935, Pub. L. No. 92-603 § 235 (codified as amended in scattered sections of 42 U.S.C.); 42 C.F.R. § 433.111.

⁴⁵ Overview Medicaid Management Information Systems, <http://www.cms.hhs.gov/MMIS> (last visited April 24, 2009).

⁴⁶ See generally UNITED STATES DEPARTMENT OF AGRICULTURE FOOD AND NUTRITION SERVICE, FNS HANDBOOK 901, (Aug. 2007), available at http://www.fns.usda.gov/apd/Handbook_901_2007/Chapter_8_v1.1.pdf.

⁴⁷ PARIS is primarily concerned with identifying beneficiaries who travel across state lines to receive benefits in other states. Due to Hawaii's remoteness from the U.S., this is likely a less pressing concern.

⁴⁸ See PARIS Home Page, <http://www.acf.hhs.gov/programs/paris/index.html> (last visited Apr. 24, 2009).

⁴⁹ PARIS Flowchart of Data, http://www.acf.hhs.gov/programs/paris/documents/PARIS_Generic_Flowchart.doc (last visited Apr. 24, 2009).

⁵⁰ Instructions for DMDC Direct: Connect on the PARIS Project, http://www.acf.hhs.gov/programs/paris/state_info/ConnectDirect_Instructions.html (last visited Apr. 24, 2009).

⁵¹ *Id.*

⁵² Green Book, *supra* note 35, at 15-10.

⁵³ FNS Supplemental Nutrition Assistance Program (SNAP), <http://www.fns.usda.gov/fsp/faqs.htm> (last visited Apr. 24, 2009).

- ⁵⁴ Green Book, *supra* note 35, at 15-21. 27 percent of SNAP recipient households receive disability benefits as well. *Id.*
- ⁵⁵ UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES, ET. AL., MEDICAID AT-A-GLANCE 2005: A MEDICAID INFORMATION SOURCE 1 (2005).
- ⁵⁶ *Id.* at 2.
- ⁵⁷ THE KAISER COMMISSION ON MEDICAID AND THE UNINSURED, MEDICAID: A PRIMER 2009: KEY INFORMATION ON THE NATION'S HEALTH PROGRAM FOR LOW-INCOME PEOPLE 26 (Jan. 2009).
- ⁵⁸ Green Book, *supra* note 35, at 7-4.
- ⁵⁹ *See id.*
- ⁶⁰ GRETCHEN ROWE, MARY MURPHY, AND JAMES KAMINSKI, WELFARE RULES DATABOOK: STATE TANF POLICIES AS OF JULY 2007 64-69 (Aug. 2008).
- ⁶¹ Green Book, *supra* note 35, at 7-32, 7-88.
- ⁶² *Id.* at 15-3.
- ⁶³ *See generally* G. JEROME GALLAGHER, ET. AL., STATE GENERAL ASSISTANCE PROGRAMS 1998 (Apr. 1999).
- ⁶⁴ 42 U.S.C. § 1320b-7(d)(1)(A).
- ⁶⁵ *See* U.S. DEPARTMENT OF LABOR, UI 35-95 § 4 (June 28, 1995) *available at* <http://wdr.doleta.gov/directives/attach/UIPL35-95.cfm>.
- ⁶⁶ *See generally* Food Programs Feasibility Study, *supra* note 26.
- ⁶⁷ Frequently Asked Questions About WIC, <http://www.fns.usda.gov/wic/FAQs/FAQ.HTM#1> (last visited May 13, 2009).
- ⁶⁸ WIC Program Annual Summary, <http://www.fns.usda.gov/pd/wisummary.htm> (last visited May 13, 2009); UNITED STATES DEPARTMENT OF AGRICULTURE FOOD AND NUTRITION SERVICE, WIC PARTICIPANT AND PROGRAM CHARACTERISTICS 2006 v (Dec. 2007) [hereinafter *WIC Characteristics*].
- ⁶⁹ *Id.* at v.
- ⁷⁰ 8 U.S.C. § 1615(b).
- ⁷¹ Green Book, *supra* note 35, at 15-4.
- ⁷² CONGRESSIONAL RESEARCH SERVICE, THE LOW-INCOME HOME ENERGY ASSISTANCE PROGRAM (LIHEAP): PROGRAM AND FUNDING 11 (Oct. 2008).
- ⁷³ CENTER ON BUDGET AND POLICY PRIORITIES, INTRODUCTION TO THE HOUSING VOUCHER PROGRAM 1 (Jul. 2007).
- ⁷⁴ *Id.* at 3
- ⁷⁵ *See* UNITED STATES GOVERNMENT ACCOUNTABILITY OFFICE, POLICY DECISIONS AND MARKET FACTORS EXPLAIN CHANGES IN THE COSTS OF THE SECTION 8 PROGRAMS (Apr. 2006).
- ⁷⁶ *See e.g.* Colorado Section 8 Application, <http://www.uaacog.com/Section%208%20Application.pdf> (last visited May 13, 2009); *see also* Pennsylvania Section 8 Application, http://www.hfmanor.com/Application_-_Section_8-Blank.pdf (last visited May 13, 2009).
- ⁷⁷ UNITED STATES DEPARTMENT ON HOUSING AND URBAN DEVELOPMENT, HOUSING CHOICE VOUCHER GUIDEBOOK, 19-1, 19-2 (Feb. 2008).

- ⁷⁸ *Id.* at 5-6.
- ⁷⁹ *Id.* at 5-8.
- ⁸⁰ About HMIS, <http://www.hmis.info/About.aspx> (last visited May 13, 2009).
- ⁸¹ *See generally* Find HMIS Implementations by State, <http://www.hmis.info/Communities/> (last visited May 13, 2009).
- ⁸² 69 Fed. Reg. 45888 (Jul. 30, 2004).
- ⁸³ UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT, 2007 ANNUAL HOMELESS ASSESSMENT REPORT: A SUMMARY OF FINDINGS 3 (Aug. 2008).
- ⁸⁴ 69 Fed. Reg. 45901 (Jul. 30, 2004).
- ⁸⁵ *See e.g.* IDAHO HOUSING AND FINANCE ASSOCIATION, HOMELESS MANAGEMENT INFORMATION SYSTEM POLICY AND PROCEDURES 17 (Jul. 2006); UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT, WHAT WORKS IN PARTNERSHIP BUILDING FOR HMIS 17 (Apr. 2003).
- ⁸⁶ *See* 71 Fed. Reg. 39216 (Jul. 12, 2006).
- ⁸⁷ Green Book, *supra* note 35, at 3-5.
- ⁸⁸ *See* SSI Monthly Statistics, March 2009, http://www.ssa.gov/policy/docs/statcomps/ssi_monthly/2009-03/table02.html (last visited Apr. 27, 2009).
- ⁸⁹ *See* SOCIAL SECURITY ADMINISTRATION, STATE ASSISTANCE PROGRAMS FOR SSI RECIPIENTS (Dec. 2008) [hereinafter *State SSI Programs*].
- ⁹⁰ *Id.*
- ⁹¹ *Id.*
- ⁹² *See* Disability Benefits, <http://www.ssa.gov/pubs/10029.html#part5> (last visited Apr. 24, 2009).
- ⁹³ How Much Work Do You Need? Disability Planner, <http://www.ssa.gov/dibplan/dqualify2.htm> (last visited Apr. 24, 2009).
- ⁹⁴ SSDI Decision, <http://www.ssdrc.com/disabilityquestions4-52.html>, (last visited Apr. 24, 2009).
- ⁹⁵ SOCIAL SECURITY ADMINISTRATION, ANNUAL STATISTICAL REPORT ON THE SOCIAL SECURITY DISABILITY INSURANCE PROGRAM 17 (Aug. 2008).
- ⁹⁶ The federal government last compiled information on multiple program participation in 2002.
- ⁹⁷ *See* Green Book, *supra* note 35, at 15-4.
- ⁹⁸ *See* 75 Fed. Reg. 42159 (Jul. 25, 2006).
- ⁹⁹ MEDPAC, MEDICARE BENEFICIARY DEMOGRAPHICS 23 (Jun. 2006).
- ¹⁰⁰ *Id.* at 19.
- ¹⁰¹ Green Book, *supra* note 35, at 15-3.
- ¹⁰² *Id.* at 15-142–15-146.
- ¹⁰³ *Id.* at 15-137–15-138.
- ¹⁰⁴ Mississippi Workers' Compensation Commission, MWCC Form B-18 (revised 7-96), http://www.summitholdings.com/forms/claims/ms/B18_WCCCommission-MS.pdf; West Virginia Bureau of Employment Programs, Workers' Compensation Division, Application for Dependents' Benefits (WC

402, rev. 2/03), <http://www.50statelegalforms.com/files/form3/form30857.pdf>; Ohio Bureau of Workers' Compensation, First Report of an Injury, Occupational Disease or Death (FROI), <https://www.ohiobwc.com/bwcCommon/forms/froi/default.asp> (last visited June 24, 2009).

¹⁰⁵ Indiana Workers' Compensation Board, Ombudsman Division, Request for Assistance (State Form 45442) (R2 / 5/06), <http://www.in.gov/icpr/webfile/formsdiv/45442.pdf>.

¹⁰⁶ See generally Home Page of the National Library Service for the Blind and Physically Handicapped, <http://www.loc.gov/nls/> (last visited Apr. 24, 2009).

¹⁰⁷ See UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES, E-VERIFY USER MANUAL FOR DESIGNATED AGENTS 54 (March 2009).

¹⁰⁸ UNITED STATES DEPARTMENT OF HOMELAND SECURITY, PRIVACY IMPACT ASSESSMENT FOR THE CENTRAL INDEX SYSTEM 5 (June 2007).

¹⁰⁹ *Id.*

¹¹⁰ *Id.* at 3.

¹¹¹ UNITED STATES DEPARTMENT OF EDUCATION ADVISORY COMMITTEE ON STUDENT FINANCIAL ASSISTANCE, SUMMARY OF FAFSA PROCESSING STATISTICS (Feb. 2006), *available at* <http://www.ed.gov/about/bdscomm/list/acsfa/FAFSAsstatsfeb2006.doc>; UNITED STATES CENSUS BUREAU, SCHOOL ENROLLMENT-SOCIAL AND ECONOMIC CHARACTERISTICS OF STUDENTS, ENROLLMENT OF THE POPULATION 15 YEARS OLD AND OVER, BY SCHOOL TYPE, ATTENDANCE STATUS, CONTROL OF SCHOOL, SEX, AGE, RACE, AND HISPANIC ORIGIN, October 2005 (Total; college and graduate).

¹¹² 64 Fed. Reg. 30160 (June 4, 1999).

¹¹³ Free Application for Federal Student Aid: Privacy and Security Information, <http://www.fafsa.ed.gov/privimpact.htm> (last visited July 20, 2009).

¹¹⁴ See U.S. Postal Service, NCOALink Systems, <http://www.usps.com/ncsc/addressservices/moveupdate/changeaddress.htm> (last visited July 20, 2009); U.S. Postal Service, DMM 509 Nonmailing Services, <http://pe.usps.com/text/dmm300/509.htm> (last visited July 20, 2009).

¹¹⁵ See ADAM SKAGGS AND JONATHAN BLITZER, BRENNAN CENTER FOR JUSTICE AT NYU SCHOOL OF LAW, PERMANENT VOTER REGISTRATION 22 (June 2009).

¹¹⁶ 71 Fed. Reg. 1815 (Jan. 11, 2006).

¹¹⁷ Social Security Administration, Answer: How do I correct the address on my Social Security Statement?, http://ssa-custhelp.ssa.gov/cgi-bin/ssa.cfg/php/enduser/std_adp.php?p_faqid=127 (last visited July 20, 2009).

¹¹⁸ *Id.*

¹¹⁹ See Paul Cerecwich, Jr., Chairman, IRS Oversight Board, Statement before the H. Comm. on Appropriations, Subcomm. On Financial Services and General Govt. (June 5, 2009).

¹²⁰ See UNITED STATES CENSUS BUREAU, THE CENSUS BUREAU'S MASTER ADDRESS FILE (MAF): CENSUS 2000 ADDRESS LIST BASICS 1 (March 1999).

¹²¹ *Id.* at 13.

¹²² *Id.* at 4-5.

¹²³ UNITED STATES GOVERNMENT ACCOUNTABILITY OFFICE, 2010 CENSUS: CENSUS BUREAU HAS IMPROVED THE LOCAL UPDATE OF CENSUS ADDRESSES PROGRAM, BUT CHALLENGES REMAIN 7-8.

APPENDIX A.

COLLECTION OF CITIZENSHIP INFORMATION
AT DEPARTMENTS OF MOTOR VEHICLES (CHART)

State	Always collects citizenship information in some form	Includes citizenship info in Database	Citizenship field on driver's license form	Proof of lawful status expressly required (E) or required because of documentation requirements (D)	Documents citizens might furnish as proof of identity (red text indicates documents that do not prove citizenship)	Documentary Proof of citizenship Required of citizen applicants	Collects citizenship information for Enhanced Driver's license/ ID applicants	Notes
Alabama	No	Documents presented (not searchable)	No paper form; No verbal citizenship question	Yes (E)	US birth certificate or certification of birth abroad, US Passport, Alabama license or ID , naturalization or citizenship certificate, social security card	No	No	
Alaska	Yes	No	Yes	Yes (D)	US birth certificate or certification of birth abroad, US Passport, Alaska license or ID , naturalization or citizenship certificate, military ID , social security card	No	No	
Arizona	Yes		Yes	Yes (E)	License or permit from lawful presence state , enhanced license, US birth certificate or certification of birth abroad, naturalization or citizenship certificate, US passport, AZ ID , tribal certificate or affidavit of birth, military ID , corrections affidavit of ID or released offender/re-entry ID	No	No	
Arkansas	No	No	No	Yes (E)	US Passport, US birth certificate, military ID/ discharge papers	No	No	
California	No		No	Yes (E)	US birth certificate or certification of birth abroad, tribal documentation, US passport, military ID , certified court order from a court of competent jurisdiction , naturalization certificate or citizenship certificate	No	No	
Colorado	No	Documents presented	No paper form; No verbal citizenship question	Yes (E)	CO license or ID , license or ID from legal presence state , US passport, military ID , naturalization or citizenship certificate, US birth certificate, US adoption order, social security card	No	No	
Connecticut	Yes		Yes	Yes (E)	US birth certificate or registration of birth abroad, valid US passport, Citizenship or naturalization certificate	Yes	No	

State	Always collects citizenship information in some form	Includes citizenship info in Database	Citizenship field on driver's license form	Proof of lawful status expressly required (E) or required because of documentation requirements (D)	Documents citizens might furnish as proof of identity (red text indicates documents that do not prove citizenship)	Documentary Proof of citizenship Required of citizen applicants	Collects citizenship information for Enhanced Driver's license/ ID applicants	Notes
D.C.	Yes		Yes	Yes (D)	US birth certificate, DC license or ID, US passport, military ID , naturalization or citizenship certificate, correctional form or ID	No	No	
Delaware	Yes	Documents presented	No	Yes (D)	Valid US passport, US birth certificate or certification of birth abroad, naturalization or citizenship certificate	Yes	No	
Florida	Yes	Yes	No	Yes (E)	US birth certificate, valid US passport, naturalization certificate	Yes	No	
Georgia	Yes	Yes	TBD	Yes (E)	US birth certificate, valid US passport, naturalization or citizenship certificate	Yes	No	
Hawaii	No	No	Identity documents presented listed on form	Not Required	HI or other license , US passport, US birth certificate or certification of birth abroad; naturalization certificate	No	No	Bill in the legislature right now to instate a legal status requirement; DL administration decentralized by county
Idaho	Yes	Yes	No paper form; Verbal citizenship question	Yes (E)	US birth certificate or certification of birth abroad, naturalization or citizenship certificate	Yes	No	
Illinois	Yes		Yes	Yes (D)	Illinois license or ID with SSN, military service record, social security award letter, military license or ID, social security card	No	No	Has tiered licensing - lawfully present noncitizens with no SSN get a "temporary visitor DL," citizens and noncitizens with a valid SSN get a regular DL
Indiana	No	Documents presented	No	Yes (E)	US birth certificate or certification of birth abroad, naturalization / citizenship certificate, military ID , US passport	No	No	
Iowa	Yes	Yes	No paper form; Verbal citizenship question	Yes (D)	Iowa license or ID, military ID w/ SSN, employer stub or certain tax forms w/ SSN, social security card	No	No	Requires immigration documentation if an individual cannot provide a SSN
Kansas	No	Documents presented (not searchable)	No paper form; No verbal citizenship question	Yes (E)	US birth certificate or certification of birth abroad, naturalization / citizenship certificate, military ID , US passport	No	No	
Kentucky	Yes	Yes	No paper form; Verbal citizenship question	Yes (E)	SS card , US birth certificate	No	No	Citizens and legal permanent residents (LPRs) fill out a different application from non-LPR noncitizens.

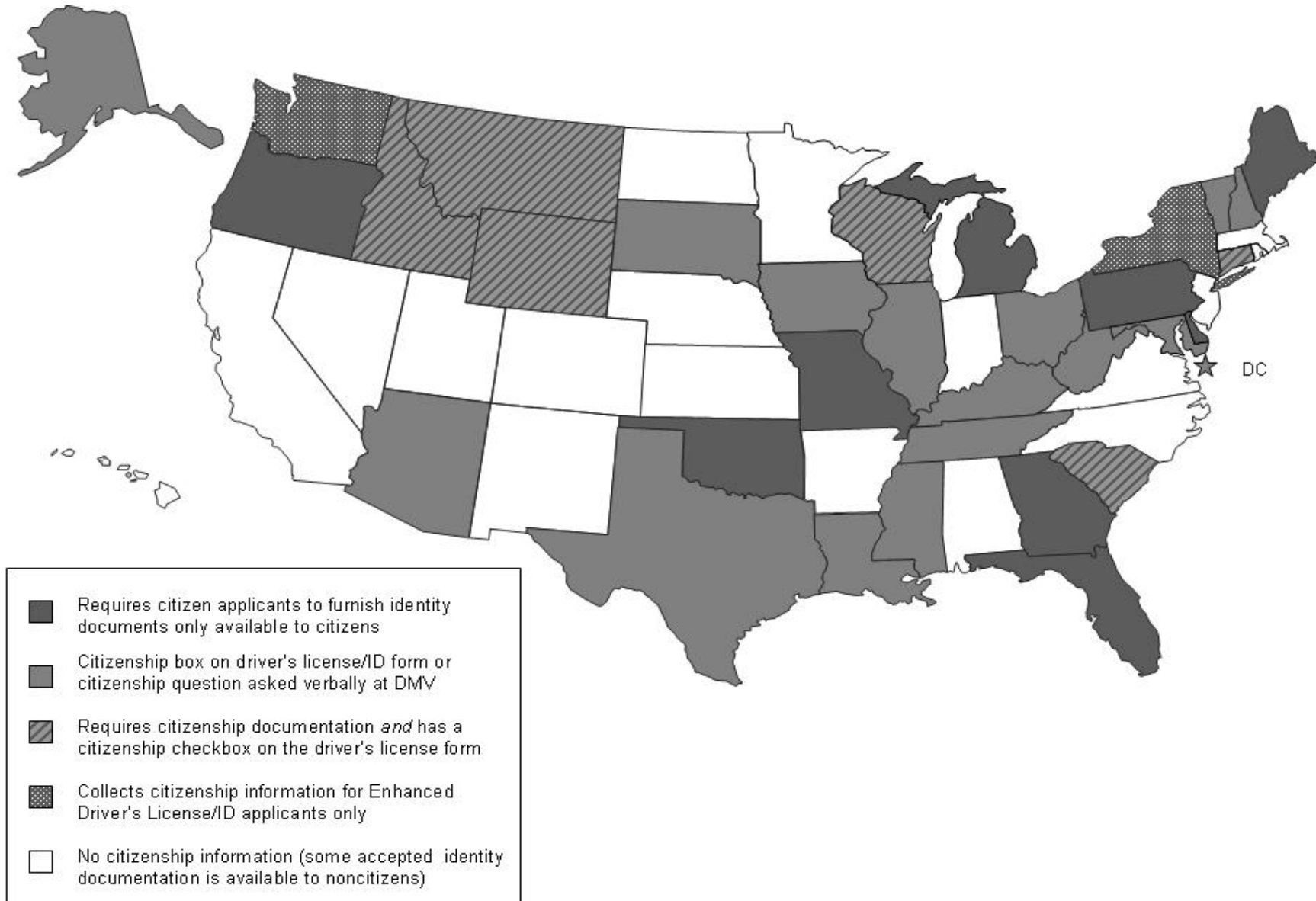
State	Always collects citizenship information in some form	Includes citizenship info in Database	Citizenship field on driver's license form	Proof of lawful status expressly required (E) or required because of documentation requirements (D)	Documents citizens might furnish as proof of identity (red text indicates documents that do not prove citizenship)	Documentary Proof of citizenship Required of citizen applicants	Collects citizenship information for Enhanced Driver's license/ ID applicants	Notes
Louisiana	Yes		Yes	Yes (E)	US birth certificate or certification of birth abroad, US Passport, naturalization certificate, Coast Guard Merchant Mariner Card , Native American tribal document	No	No	
Maine	Yes		No	Yes (E)	US birth certificate, US passport, naturalization/ citizenship certificate, US citizen ID, American Indian Card, Northern Mariana ID	Yes	No	
Maryland	Yes	Yes	No paper form; Verbal citizenship question	Yes (E)	US birth certificate or certification of birth abroad, US Passport, SS card, military ID or discharge papers, MD or other license, baptismal certificate, school records , citizenship/ naturalization certificate, government driver's license	No	No	Lawful status provision takes effect 7/2009; Requires immigration documentation if an individual cannot provide a valid SSN
Massachusetts	No		No	Yes (D) EXCEPT for individuals who furnish a Mexican or Canadian driver's license as proof of identity	US Passport, MA license or ID, out of state license, military discharge papers , US birth certificate or certification of birth abroad, certified court order, military discharge papers, merchant mariner ID , US baptismal certificate, military ID, MA firearms card	No	No	
Michigan	Yes	Documents presented (not searchable)	No	Yes (E)	US birth certificate or certification of birth abroad, US passport, naturalization / citizenship certificate	Yes	Yes	
Minnesota	No	Documents presented	No	Yes (E)	US birth certificate or certification of birth abroad, US adoption certificate, US passport, MN tribal ID, military ID	No	No	
Mississippi	Yes		Yes	Yes (E)	social security card, many forms of ID available to noncitizens	No	No	Requires immigration documentation if an individual cannot provide a SSN
Missouri	Yes		No	Yes (E) EXCEPT for individuals over the age of 65	US birth certificate or certification of birth abroad, US passport, naturalization / citizenship certificate	Yes	No	

State	Always collects citizenship information in some form	Includes citizenship info in Database	Citizenship field on driver's license form	Proof of lawful status expressly required (E) or required because of documentation requirements (D)	Documents citizens might furnish as proof of identity (red text indicates documents that do not prove citizenship)	Documentary Proof of citizenship Required of citizen applicants	Collects citizenship information for Enhanced Driver's license/ ID applicants	Notes
Montana	Yes		Yes	Yes (E)	US birth certificate, US passport, naturalization/ citizenship certificate, American Indian Card, US citizen ID, Northern Mariana ID, tribal ID	Yes	No	
Nebraska	No		No	Yes (D)	Photo in Nebraska DMV system, US birth certificate or certification of birth abroad, out of state license or permit, nebraska ID/ license/permit, US passport, military ID, citizenship/naturalization certificate, tribal card, merchant marine ID, Job Corps card	No	No	
Nevada	No		Identity documents presented listed on form	Yes (D)	US birth certificate or certification of birth abroad, US passport, military ID, naturalization /citizenship application, certificate of degree of indian blood	No	No	
New Hampshire	Yes		Yes	Yes (D)	US passport, US birth certificate or certification of birth abroad, military ID, valid license from another state	No	No	
New Jersey	No	No	No	Yes (E)	US birth certificate or certification of birth abroad, US passport, NJ license/boat license/ID, military ID, US adoption papers, naturalization/ citizenship certificate	No	No	
New Mexico	No		No	Not Required	NM or other license, U.S. Passport, military ID, tribal ID, VA medical ID, US or foreign birth certificate, naturalization papers, court order, marriage certificate	No	No	
New York	No		Identity documents presented listed on form	Yes (D)	social security card, many forms of ID available to noncitizens	No	Yes	Has tiered licensing - an enhanced DL only available to citizens, and a regular DL is available to legally present noncitizens as well as citizens.
North Carolina	No	Documents presented (not searchable)	No paper form; No verbal citizenship question	Yes (D)	social security card, many forms of ID available to noncitizens	No	No	

State	Always collects citizenship information in some form	Includes citizenship info in Database	Citizenship field on driver's license form	Proof of lawful status expressly required (E) or required because of documentation requirements (D)	Documents citizens might furnish as proof of identity (red text indicates documents that do not prove citizenship)	Documentary Proof of citizenship Required of citizen applicants	Collects citizenship information for Enhanced Driver's license/ ID applicants	Notes
North Dakota	No	No	No	Yes (D)	US birth certificate or certification of birth abroad, US passport, military ID, court order with name and DOB, ND permit/license/ID	No	No	
Ohio	Yes	Yes	Yes	Yes (E)	OH or another state license/ID/permit , US birth certificate, certified court order with name and DOB, military ID, US passport, prisoner release ID	No	No	Has tiered licencing; citizens and LPRs get a regular driver's license; non-LPR noncitizens get a non-transferrable, non-renewable driver's license.
Oklahoma	Yes		No	Yes (E)	US passport, US birth certificate or certification of birth abroad, naturalization certificate, OK license or ID issued after 11/1/07	Yes	No	
Oregon	Yes		Identity documents presented listed on form	Yes (E)	US birth certificate or certification of birth abroad, US passport, tribal ID, naturalization/ citizenship certificate	Yes	No	Individuals who cannot immediately furnish required documentation may be eligible for a temporary driver's license
Pennsylvania	Yes		No	Yes (E)	US birth certificate, US passport, naturalization/ citizenship certificate	Yes	No	
Rhode Island	No		No	Yes (D) EXCEPT for individuals who furnish a US-issued baptismal certificate as proof of identity	social security card, many forms of ID available to noncitizens	No	No	
South Carolina	Yes		Yes	Yes (E)	US birth certificate or certification of birth abroad, US passport, naturalization/ citizenship certificate	Yes	No	
South Dakota	Yes		Yes	Yes (E)	US birth certificate, US passport, US citizen ID, tribal ID, naturalization/citizenship certificate, other state license or ID	No	No	
Tennessee	Yes		Yes	Yes (E)	US birth certificate or certification of birth abroad, US passport, citizenship/naturalization certificate, military ID , citizen ID card	No	No	Got rid of driving certificates for undocumented immigrants in 2007. Now has proof of status requirement for all DLs, and issues separate, temporary DLs to individuals not authorized to stay in the US indefinitely.

State	Always collects citizenship information in some form	Includes citizenship info in Database	Citizenship field on driver's license form	Proof of lawful status expressly required (E) or required because of documentation requirements (D)	Documents citizens might furnish as proof of identity (red text indicates documents that do not prove citizenship)	Documentary Proof of citizenship Required of citizen applicants	Collects citizenship information for Enhanced Driver's license/ ID applicants	Notes
Texas	Yes		Yes	Yes (D)	Texas license or ID, US passport, citizenship/naturalization certificate, military ID	No	No	Had tiered licensing that differentiated between non-LPR noncitizens and others; court ruled against the state in a challenge to this law in April 2009.
Utah	No		No	Yes (D)	social security card, many forms of ID available to noncitizens	No	No	Proof of legal presence required for regular driver's license but NOT required for "driving privilege card."
Vermont	Yes		Yes	Yes (E)	Any state license or ID, US birth certificate, court order, military ID, US passport, VT learner's permit	No	Yes	
Virginia	No		Identity documents presented listed on form	Yes (E)	Us birth certificate or certification of birth abroad, US passport, naturalization/citizenship certificate, military ID or discharge papers, US citizen ID	No	No	
Washington	No		TBD	Not Required	U.S. Passport, naturalization papers, U.S. or foreign birth certificate, military ID, WA or other license, Human Services or Department of Corrections letter, police ID, weapons permit, driving record, school transcript, Medicare card, divorce decree, tribal ID	No	Yes	Has tiered licensing - an enhanced DL only available to citizens, and a regular DL available to noncitizens; including undocumented individuals.
West Virginia	Yes		Yes	Yes (D)	Citizenship/ Naturalization certificate, US birth certificate, military ID, WV license/permit/ID, US passport	No	No	
Wisconsin	Yes		Yes	Yes (E)	US birth certificate, US passport, Citizenship/Naturalization certificate	Yes	No	
Wyoming	Yes		Yes	Yes (E)	US birth certificate, US passport, Naturalization certificate	Yes	No	

APPENDIX B. COLLECTION OF CITIZENSHIP INFORMATION AT DEPARTMENTS OF MOTOR VEHICLES (MAP)



APPENDIX C. OVERVIEW OF STATE SOCIAL SERVICE DATABASES

State	Main System Name	Programs Included in Database					Has Citizenship Field*	Notes	States Using a Common Database Structure
		Food Stamps	TANF	Medicaid	SSI*	General Assistance*			
Alabama	FACTS	x	x	x				New FACTS system rollout was scheduled to be complete in Jan. 2009	
Alaska	EIS	x	x	x	x	x	Yes	Alaska seems to be contemplating replacement of this older system, but EIS maintenance funding requests were submitted for 2009.	Alaska, Arizona, D.C., Kansas, Montana
Arizona	AZTECS	x	x	x			Yes	AZTECS is being updated and combined with other systems through 2008 and 2009.	Alaska, Arizona, D.C., Kansas, Montana
Arkansas	ANSWER	x	x	x					
California	MMIS			x					
California	ISAWS	x	x					Most of the counties using this system will migrate to C-IV.	
California	C-IV	x	x						
California	CalWin	x	x						
California	LEADER	x	x					LEADER is used in Los Angeles County only.	
Colorado	CBMS	x	x	x	x			A CBMS "Realignment project" is underway to change the way data interfaces across programs; the project is ongoing in 2009.	
Connecticut	EMS	x	x	x	x	x			Connecticut, New Mexico, North Carolina, Washington
D.C.	ACEDS	x	x	x		x		An upgrade to ACEDS was proposed in the 2008 budget, but the system is still in use	Alaska, Arizona, D.C., Kansas, Montana
Delaware	DCISII	x	x	x	x				Delaware, Florida, New Hampshire, West Virginia, Wisconsin

*The absence of an "x" in the SSI or General Assistance column does not imply that the database in question is not used to administer these programs; full information as to the inclusion of programs outside of TANF, food stamps, and Medicaid has not yet been determined.

State	Main System Name	Programs Included in Database					Has Citizenship Field*	Notes	States Using a Common Database Structure
		Food Stamps	TANF	Medicaid	SSI*	General Assistance*			
Florida	FLORIDA	x	x	x			Yes	Delaware, Florida, New Hampshire, West Virginia, Wisconsin	
Georgia	SUCCESS	x	x	x			Yes		
Hawaii	HAWI	x	x	x					
Idaho	IBIS	x	x	x		x		A launch of IBIS is scheduled for July 2009, with statewide implementation 90 days later	
Illinois	CDB	x	x	x					
Indiana	ICES	x	x	x			Yes	Indiana, Idaho, Tennessee	
Iowa	IABC	x	x	x			Yes		
Kansas	KAECSES	x	x	x		x		A "Human Services Management Project" will begin in 2010 to combine KAESCES with other systems and eventually replace this database entirely.	
Kentucky	KAMES	x	x	x					
Louisiana	LAMI	x	x					Louisiana released a RFP in March 2009 to consolidate and replace social service data systems.	
Louisiana	MMIS			x					
Maine	ACES	x	x	x					
Maryland	CIS/CARES	x	x	x			Yes		
Massachusetts	MassCARES	x	x	x					
Michigan	CIMS	x	x	x	x	x			
Minnesota	MAXIS	x	x	x		x	Yes	Minnesota, Mississippi, Nevada, Rhode Island, South Dakota, Vermont	
Mississippi	MAVERICS	x	x	x				Minnesota, Mississippi, Nevada, Rhode Island, South Dakota, Vermont	
Missouri	FAMIS	x	x						
Missouri	HDFS			x					
Montana	TEAMS	x	x	x			Yes	Montana is contemplating an upgrade within the next three years	
Nebraska	N-FOCUS	x	x	x	x	x	Yes	Alaska, Arizona, D.C., Kansas, Montana	

State	Main System Name	Programs Included in Database					Has Citizenship Field*	Notes	States Using a Common Database Structure
		Food Stamps	TANF	Medicaid	SSI*	General Assistance*			
Nevada	NOMADS	x	x	x				The 2009-2011 budget request includes a review for possible improvements to NOMADS.	Minnesota, Mississippi, Nevada, Rhode Island, South Dakota, Vermont
New Hampshire	NewHEIGHTS	x	x	x					Delaware, Florida, New Hampshire, West Virginia, Wisconsin
New Jersey	FAMIS	x	x	x					
New Mexico	ISD2	x	x	x		x	Yes	A project to replace ISD2 is currently in the planning phase.	Connecticut, New Mexico, North Carolina, Washington
New York	SWMS	x	x	x		x	Yes	The SWMS system was recently upgraded and the new version may not yet be fully operational.	
North Carolina	FSIS	x							Connecticut, New Mexico, North Carolina, Washington
North Carolina	EIS		x	x			Yes		
North Dakota	Common Database	x	x	x	x	x		The Common Database contains a "Master Client Index" for all clients whose cases are managed in several program-specific databases.	
Ohio	CRIS-E	x	x	x		x	Yes	Ohio released an RFP for system enhancements in 2009.	Indiana, Idaho, Tennessee
Oklahoma	FACS	x	x	x					
Oregon	CMS	x	x						
Oregon	MMIS			x			Yes	A new version of MMIS was launched in December of 2008.	
Pennsylvania	CIS	x	x	x				Pennsylvania also appears to have a master client file (MCS) that may prove more expansive.	
Rhode Island	INRHODES	x	x	x					Minnesota, Mississippi, Nevada, Rhode Island, South Dakota, Vermont
South Carolina	CHIPS	x	x	x					
South Dakota	ACCESS	x	x	x					Minnesota, Mississippi, Nevada, Rhode Island, South Dakota, Vermont
Tennessee	ACCENT	x	x	x					Indiana, Idaho, Tennessee

State	Main System Name	Programs Included in Database					Has Citizenship Field*	Notes	States Using a Common Database Structure
		Food Stamps	TANF	Medicaid	SSI*	General Assistance*			
Texas	TIERS	x	x	x				TIERS is a new system that is undergoing expansion to statewide use through 2008 and 2009.	
Utah	eREP	x	x	x					
Vermont	ACCESS	x	x	x					Minnesota, Mississippi, Nevada, Rhode Island, South Dakota, Vermont
Virginia	ADAPT	x	x	x					
Washington	ACES	x	x	x			Yes		Connecticut, New Mexico, North Carolina, Washington
West Virginia	RAPIDS	x	x	x					Delaware, Florida, New Hampshire, West Virginia, Wisconsin
Wisconsin	CARES	x	x	x			Yes	The state's 2007-2012 technology plan includes enhancements to CARES.	Delaware, Florida, New Hampshire, West Virginia, Wisconsin
Wyoming	IRIS (EPICS/IRIS)	x	x	x			Yes		