



PIMA COUNTY RECORDER'S OFFICE

Voter Registration List Maintenance

VOTER REGISTRATION – List Maintenance Overview

The Pima County Recorder is responsible for maintaining the voter registration roll of all eligible voters. That responsibility includes active list maintenance to ensure the voter registration roll reflects the most current eligible voters. ARS 16-165 – Causes for Cancellation is the controlling statute governing the voter registration list maintenance activities, while the 2023 Arizona Election Procedures Manual (EPM) Chapter 1, Sec. 9 define the list maintenance procedures used by voter registration staff for daily work.

In addition to the procedures outlined in the EPM, the Pima County Recorder's Office also created internal standard operating procedures to further assist staff to keep the voter rolls clean. Each area noted below also shows whether the task is mandated by statute, EPM or office procedure. Our office has numerous instructions for staff to do all the tasks.

List Maintenance Tasks

- A. **Returned Election Mail** (anything we mail to voters) – per Federal NVRA (National Voter Registration Act, 52 USCA § 20507; Arizona Revised Statutes A.R.S. § 16-166; EPM p. 46.
1. NVRA process begins after a piece of returned mail is received back by our office.
 2. A NVRA letter is sent
 3. Voters can update. A.R.S. § 16-544(E).
 4. After 35 days with no response to the 2nd piece of returned mail, voter is moved to Inactive status and no further mail is sent to voter.
 5. After 2 Federal Election cycles with no response, voter is canceled. A.R.S. § 165(A)(7).
- B. **Deaths** (A.R.S. § 16-165(A)(2))
1. AZ provides monthly AZDHS (AZ Dept of Health Services) list of people who died in Arizona – staff checks for a good match. A.R.S. § 16-165(D); EPM p. 36.
 2. ERIC provides a monthly SSA (Social Security Administration) death list – staff checks for a good match. EPM p. 37.

3. Staff reviews all Pima recorded documents for death certificates and checks against voter file monthly. EPM p. 38.
 4. Staff reviews obituaries daily from several local publications online and printed. EPM p. 38.
 5. If we receive a call or email notifying us that a voter has passed away, we inform the caller that we need either a copy of a death certificate or a paid obituary to cancel the voter registration of a deceased voter. Similarly, if we receive a handwritten note on a piece of returned official election mail, a letter is sent to the home of the voter and/or someone who is administering their estate notifying them of the requirements to cancel the voter registration.
- C. Our Voter Database interfaces with the statewide, **Active Voter Information Database (AVID)** system to automatically check for the following:
1. Duplicate matches with other counties in AZ
 2. Felony convictions where the courts have notified the AZSOS. EPM p. 38.
 3. MVD (Motor Vehicle Department). EPM p. 26
 - i. for F type license (indicating not a citizen)
 - ii. Match number provided or identify a match already in MVD system when driver's license is not provided.
 4. SSA (Social Security Administration) verification. EPM p. 26.
- D. **SAVE** database (Federal) (Systematic Alien Verification for Entitlements)
1. Checks where necessary for citizenship status. *See* EPM p. 9 stating that "SAVE shall only be used for verification of citizenship for a new registration if the registrant provides a Naturalization Certificate Number, Citizenship Certificate Number, or Alien Registration Number as DPOC. Further, under the terms of the current USCIS MOA, SAVE shall not be used for list maintenance purposes, i.e. to cancel an existing registration.) *See* A.R.S. § 16-165.
 2. Please see Chapter 1, Section 6 of the Elections Procedure Manual for more about the extensive SAVE verification procedures.
- E. **Periodically staff runs reports to check for anomalies in records** – these checks were instituted to verify integrity of our data
1. Duplicate check by AZ Driver's License
 2. Duplicate check by same first name, SSN (Social Security Number) & DOB (Date of Birth)
 3. Reg date prior to 1/1/20 – checks for entry errors
 4. Reg date later than the effective date of change – checks for entry errors

5. Effective date of change is less than or equal to 1/1/1972 – checks for entry errors
6. Records with odd telephone numbers
7. Voters over the age of 100

F. **NCOA** (National Change of Address)

1. Our vendor runs the report with the USPS (US Postal Service)
 - Not federally mandated but permitted under 52 U.S.C. § 20507(c)(1)(A); EPM. p. 45-46; A.R.S. § 16-166(E).
 - Can be used as the “first notice” under NVRA. EPM p. 39. 52 U.S.C. § 20507(d); A.R.S. § 16-166(E).
2. Letters generated based on report. EPM. p. 46; A.R.S. § 16-544(D).
3. Always run before any large mailing
4. Have recently started to run this report monthly

G. **Notifications** that voters have registered in another state

- A. AZSOS forwards these as they are received directly from other states. EPM p. 39.
 - Not all states send this information.
 - Pima does send these notices to other states when voters provide an indication on a new registration that they were previously registered in another state.
- B. ERIC Cross State Mover report. *See also* EPM 45-46
 - *See ERIC, Electronic Registration Information Center (Eric) FAQ* (Feb. 2, 2022) (describing ERIC as a state-controlled organization “comprised of 31 states and the District of Columbia.”).
 - Cannot use the report as a first notice under NVRA.
 - We send letters to these voters with two options:
 - 1) Confirm their Pima County address.
 - 2) Cancel their registration.
- A. We can use that letter as a first notice, so NVRA notices are then generated from any returned mail from the mailing. EPM pg. 46
- B. We are also able to confirm many addresses and other voters used the option to go ahead and cancel their registrations.

H. **Juror Questionnaire** when County Recorder receives court records regarding prospective Jurors, if they self-report a felony, the County Recorder must cancel that registration. to A.R.S. § 21-314 and EPM p. 39-40.