



Voter Registration

2026 Evaluation Report

Program Evaluation Division
Office of the Legislative Auditor
State of Minnesota

Program Evaluation Division

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Members of the Legislative Audit Commission:

The Office of the Secretary of State (OSS) and individual counties share voter registration responsibilities. While we found that OSS has largely established adequate procedures for processing and maintaining voter registration records, some counties did not update records accurately in certain instances.

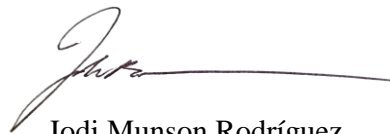
We make several recommendations to counties, including that they should update—or document their rationale for not updating—all voter registration records flagged by OSS for disqualifying conditions. We also make recommendations to OSS and the Legislature; for instance, we recommend that OSS and the Legislature work together to determine the appropriate standards for inactivating voter registration.

Our evaluation was conducted by Sarah Delacueva (evaluation manager), Gretchen Becker, and Scott Fusco, with assistance from David Kirchner, Kyle Malone, and Laura Schwartz. OSS cooperated fully with our evaluation, and we thank them for their assistance.

Sincerely,



Judy Randall
Legislative Auditor



Jodi Munson Rodríguez
Deputy Legislative Auditor



OLA



Voter Registration

The Office of the Secretary of State has largely established adequate procedures for processing and maintaining voter registration records; however, we found some instances in which counties did not update records accurately.

Report Summary

New Applications and Voter Verification

To process a voter registration application, counties must enter application information into the Statewide Voter Registration System (SVRS) that the Office of the Secretary of State (OSS) maintains. OSS and counties use the information to verify applicants' identities and residencies. We analyzed SVRS data on new voter registration applications submitted in Summer/Fall 2024.

- OSS has generally established appropriate procedures that counties are expected to follow when processing voter registration applications. (p. 15)
- While counties processed 96 percent of new voter registration applications we reviewed within the time frames established in law, they were often late to process applications received within 20 days of an election. (p. 19)

Recommendation ► Counties should process all voter registration applications within the time frames established by law. (p. 19)

- Counties followed the *identity* verification process correctly for 99.9 percent of applicants, most of whom were verified without county involvement; among the remaining applicants, counties accurately assigned voter statuses in 98 percent of cases we reviewed. (p. 23)
- Counties followed the *residency* verification process correctly for 99 percent of applicants, most of whom were verified entirely automatically. Among the applicants counties manually reviewed, counties either inaccurately assigned voter statuses or failed to document their rationale in more than one-third of the cases we reviewed. (p. 30)

Recommendation ► Counties should (1) follow state law and OSS guidance when processing returned residency verification notices (known as postal verification cards or PVCs) and, (2) accurately document all returned PVCs in SVRS. (p. 31)

- While OSS's report on PVCs returned after an election may meet statutory requirements, the report offers limited value. (p. 35)

Background

As of January 2026, nearly 3.8 million individuals were registered to vote in Minnesota. Voter eligibility and registration requirements are determined by federal and state laws.

In Minnesota, the Office of the Secretary of State (OSS) and individual counties share voter registration responsibilities. OSS maintains the Statewide Voter Registration System (SVRS) and supports counties; counties, for the most part, create and maintain voter registration records.

Processing voter registration applications involves confirming an applicant's identity, residency, and conformance with certain eligibility requirements. The order of the steps and the documents required to register vary by registration method.

When county election staff learn that a registered voter's life circumstances have changed, they must update SVRS as appropriate. This could mean changing the voter status of a voter registration record from Active to Challenged. An individual with a Challenged status must provide certain information before voting.

Recommendation ► The Legislature should clarify the purpose and requirements of post-election reporting on returned PVCs. (p. 36)

Maintaining Accurate Lists of Registered Voters

Counties must keep voter registration records up-to-date using information provided by OSS. OSS uses SVRS to convey information to counties, including information about disqualifying conditions (such as incarceration) that OSS receives from other state agencies. We reviewed data other state agencies provided to OSS in Fall 2024.

- While OSS satisfied its requirements to provide counties with data from other state agencies, counties did not always update voter registration records as required by law. (p. 39)

Recommendation ► Counties should either update—or document their rationale for not updating—all voter registration records flagged by OSS for a disqualifying condition. (p. 43)

- Counties sent required notices within 10 days to 84 percent of registered voters whose incarceration or guardianship challenges they removed. (p. 44)

Recommendation ► Counties should send a notice to all individuals whose rights to vote have been restored, as required by Minnesota rules. (p. 45)

- County survey respondents generally agreed that OSS provides useful written guidance for county election staff. (p. 53)
- Federal law, Minnesota law, and OSS practice establish different criteria for inactivating voter registration records. (p. 55)

Recommendation ► The Legislature should consider revising the criteria for inactivating voter registration records. (p. 57)

Impact of Recent Legislation

In 2023 and 2024, the Legislature enacted several changes, each of which made voter eligibility or voter registration easier for particular groups of Minnesotans. We cannot determine the extent to which the changes contributed to an increase in the number of registered voters.

Summary of Responses

In letters dated July 6, 2026, Steve Simon, Secretary of State, and Cory Kampf, President of the Minnesota Association of County Officers, each indicated that they largely agreed with OLA recommendations. Secretary Simon said OSS “appreciates the significant work that went into preparing this report,” and that “Minnesota is proud of its accurate, fair, secure, accessible, and trusted elections system.” He went on, “As the report reflects, the state law does not provide the OSS the authority to enforce county implementation of voter registration laws” but he is “pleased that this report shows that our county elections partners...report that they are getting adequate guidance from OSS.”

President Kampf noted that “Where the OLA has found that improvements can and should be made, we generally agree;” but noted that MACO wished to offer context. For example, he emphasized that residency was verified in 99 percent of applications following correct processes and noted that available data did not allow OLA to determine whether the remaining cases “represent inaccurate determinations...or if the determination was completed outside of SVRS.” He also noted that “additional avenues to register, along with other new election laws, have placed new workload demands on county election offices,” and requested that “the Legislature further investigate if statutory changes may help with efficient administration of these laws.”

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OLA

Introduction

The State of Minnesota has approximately 4.3 million citizens of voting age.¹ To vote in federal or state elections, Minnesotans must meet eligibility requirements and register. Voter registration processes help ensure that only eligible individuals are allowed to vote and that eligible individuals are not prevented from voting. In Minnesota, the Office of the Secretary of State (OSS) and counties share responsibility for voter registration.

In 2025, the Legislative Audit Commission directed the Office of the Legislative Auditor (OLA) to evaluate Minnesota’s voter registration processes. This evaluation addressed the following questions:

- **To what extent have OSS and counties complied with federal and state voter registration requirements?**
- **To what extent has OSS established and implemented appropriate voter registration policies and procedures?**
- **How have recent legislative changes in Minnesota affected voter registration?**

To evaluate voter registration processes, we reviewed relevant federal and state laws. We analyzed voter registration data from the state’s registration database to determine (1) OSS’s and counties’ compliance with legal requirements, and (2) how well OSS and counties maintain voter registration records. We also analyzed whether county election staff appropriately updated voter registration records after receiving information from the Social Security Administration, the Department of Corrections, the Department of Public Safety’s Driver and Vehicle Services Division, the Minnesota Department of Health, and the State Court Administrator’s Office. In addition, we also identified trends in voter registration rates over time.

To further understand counties’ voter registration processes, we surveyed election staff from each county. We also conducted more detailed interviews with the election staff from eight counties and visited four county election offices.

UPDATE TO 2018 REPORT

In each box, we indicate whether the 2018 recommendations:

- Are **IMPLEMENTED**.
- Are **PARTIALLY IMPLEMENTED**.
- Are **NOT IMPLEMENTED**.
- Need additional work to determine implementation.

The Legislative Audit Commission selected this evaluation as a follow up to OLA’s 2018 *Voter Registration* report.² Throughout this report, we use boxes as shown to the left to highlight the implementation status of the recommendations from OLA’s 2018 report. Each box contains one recommendation that we made to OSS or counties and our determination of the extent to which the recommendation has been implemented. We do not discuss the prior legislative recommendations in this report.

¹ U.S. Census Bureau, American Community Survey 2024, “Citizen, Voting-Age Population by Age,” <https://data.census.gov/table/ACSST1Y2024.B29001?q=B29001:+Citizen,+Voting-Age+Population+by+Age&g=040XX00US27&y=2024>, accessed January 5, 2026.

² Office of the Legislative Auditor, Program Evaluation Division, *Voter Registration* (2018).

This evaluation focused on the efforts of OSS and counties. We did not evaluate other participants in the voter registration process, such as other state agencies or election judges.³ While we examined recent legislative changes that affected voter registration or eligibility, we did not evaluate the 2023 Driver's License for All legislation because this law did not affect voter registration processes or who could register to vote. In addition, we did not evaluate election administration, voter outreach efforts, or election security.

³ OLA is conducting a separate evaluation of the Department of Public Safety's implementation of automatic voter registration.

Chapter 1: Background

An individual must register before voting in Minnesota. The voter registration process ensures that only eligible individuals are allowed to vote and that eligible individuals are not prevented from voting. The process allows each of Minnesota’s nearly 3.8 million registered voters and those who register on election day to weigh in on issues that affect their lives.

In this chapter, we first provide an overview of voter eligibility and registration requirements. We then discuss state and county roles and responsibilities in the registration process. Finally, we describe how individuals become registered to vote, including the methods and documents they may use to register.

Voter Registration Laws

Eligibility to Vote

Both federal and state laws define who is eligible to vote in Minnesota.

Federal law has established broad parameters that states must follow for determining who may vote in a federal election. The U.S. Constitution states that any individual who is at least 18 years of age must not be denied their right to vote based on age, race, or sex.¹ Further, federal law prohibits noncitizens from voting in a federal election.² States have the authority to establish additional eligibility requirements.

In Minnesota, statutes outline certain requirements an individual must meet before they are eligible to vote in a federal or state election, as shown in the box to the right.³ For example, an individual must maintain residence in the state for 20 days immediately before an election.⁴ State law also prohibits certain individuals—such as individuals incarcerated for a felony offense—from voting.⁵



To be eligible to vote in Minnesota, an individual must:

1. Be a U.S. citizen.
2. Be at least 18 years old.
3. Maintain residence in Minnesota for 20 days preceding the election.
4. Not be incarcerated for a felony conviction.
5. Not be found to be legally incompetent.
6. Not be under guardianship in which voting rights have been revoked.

— *Minnesota Statutes 2025, 201.014, subsds. 1–2*

¹ *U.S. Constitution*, amends. XV, sec. 1; XIX; and XXVI, sec. 1.

² 18 *U.S. Code*, sec. 611 (2024).

³ *Minnesota Statutes 2025*, 201.014, subsds. 1–2. Minnesota’s Constitution also establishes certain voter eligibility requirements. *Minnesota Constitution*, art. VII, sec. 1.

⁴ *Minnesota Statutes 2025*, 201.014, subd. 1(3).

⁵ *Minnesota Statutes 2025*, 201.014, subd. 2(1).

Voter Registration Requirements

While federal law sets minimum standards for voter registration, states decide whether and how an individual must register.

Congress has established requirements to ensure registration access and to maintain safe and secure elections. Federal voter registration requirements are found in two key provisions of law.

National Voter Registration Act. Congress passed the National Voter Registration Act (NVRA or “motor voter law”) in 1993 to (1) increase voter registration, (2) increase voter turnout, (3) protect elections, and (4) ensure that states maintain accurate voter rolls.⁶ NVRA contains several provisions that affect how states conduct voter registration for federal elections. For example, NVRA requires states to provide simultaneous voter registration opportunities when applying for certain services from a state agency, including when an individual applies for a driver’s license at a motor vehicle agency. In addition, NVRA outlines the conditions under which states must remove voter registration records from their voter lists.



Minnesota is **exempt** from the National Voter Registration Act.

The exemption results in Minnesota also being exempt from portions of the Help America Vote Act.

However, NVRA exempts from its requirements states that allowed election-day registration for federal elections or did not have a voter registration requirement when the law was passed, for as long as the exempting conditions remain in place. Minnesota has allowed individuals to register on election day continuously since before NVRA’s passage; thus, Minnesota is exempt from NVRA.⁷

Help America Vote Act. Congress passed the Help America Vote Act (HAVA) in 2002 to further standardize voter registration processes and election administration across states.⁸ While some of HAVA applies to Minnesota, the enactment of significant portions of HAVA depend on the state being subject to NVRA. This adds complexity to interpreting HAVA requirements and whether Minnesota must meet them. Exhibit 1.1 shows HAVA voter registration requirements that Minnesota must follow and that are relevant to this report. For example, HAVA requires states to implement a centralized and interactive voter registration database that contains a list of all active voters in the state.⁹ HAVA also requires states to assign a unique identification number to each registered voter and to verify each individual’s identity using information from other government databases.¹⁰

⁶ National Voter Registration Act of 1993, Public Law 103-31, 107 Stat. 77, now primarily codified as amended at 52 U.S. Code, Ch. 205 (2024).

⁷ Currently, U.S. territories and six states are exempt from NVRA. Idaho, Minnesota, New Hampshire, Wisconsin, and Wyoming are exempt because they have allowed election-day registration continuously since prior to NVRA’s passage. North Dakota is exempt because it does not require registration prior to voting. 52 U.S. Code, 20503(b) (2024); and United States Election Assistance Commission, *Election Administration and Voting Survey 2024 Comprehensive Report* (2025), 127.

⁸ Help America Vote Act of 2002, Public Law 107-252, 116 Stat. 1666, now primarily codified as amended at 52 U.S. Code, Ch. 209 (2024).

⁹ 52 U.S. Code, sec. 21083(a)(1)(A) (2024).

¹⁰ 52 U.S. Code, sec. 21083(a)(1)(A); and 21083(a)(5)(B) (2024).

Exhibit 1.1 Select Provisions in HAVA

HAVA Requirement	Description
Voter identification	<ul style="list-style-type: none"> States must verify voter registration applications using information from (1) the state's motor vehicle agency, and (2) the Social Security Administration. States must not process voter registration applications unless the application includes a current driver's license number, the last four digits of the applicant's Social Security number, or a unique identifying number.^a States must require an individual to provide certain documentation to register to vote in a federal election if the individual registers by mail and the individual has not previously voted in a federal election in the state.
Voter registration database	<ul style="list-style-type: none"> States with a voter registration requirement must implement a "computerized statewide voter registration list" that contains the name, registration information, and unique identifier for each eligible registered voter.
Maintaining lists of registered voters ^b	<ul style="list-style-type: none"> State election officials must maintain the voter registration list, and remove ineligible voters and update voter records in accordance with state law.

Note: There are additional requirements that pertain to voter registration and election administration that are not included in this table.

^a An applicant may indicate that they do not have a driver's license or Social Security number. The state must provide these applicants with a unique number.

^b Because Minnesota is exempt from NVRA, it does not have to follow many of HAVA's provisions for maintaining lists of registered voters. For some requirements related to maintaining lists of registered voters, HAVA specifies that exempted states should remove the names of ineligible voters in accordance with state law.

Source: 52 U.S. Code, sec. 21083 (2024).

Further, states have discretion to determine whether and how an individual must register to vote. The U.S. Constitution provides states wide latitude to administer elections.¹¹ Thus, voter registration processes differ from state to state. Nearly all states, including Minnesota, require an individual to register before they may vote; however, states vary in when an individual may register, how they may register, and what information they must provide to demonstrate their eligibility. Most states allow multiple methods for registration, including by mail, in person, online, or at a motor vehicle agency.¹² As mentioned previously, some states allow an individual to register on election day while other states do not. Lastly, some states automatically register an individual to vote when they apply for or renew their driver's license.

In Minnesota, statutes establish additional voter registration requirements beyond those shown in Exhibit 1.1. In some cases, state requirements expand on federal law. For example, while HAVA requires states to use data from the state's motor vehicle agency to verify application information, it does not establish a time frame to do so.¹³

¹¹ U.S. Constitution, art. I, sec. 4.

¹² We discuss Minnesota's methods of voter registration in a subsequent section.

¹³ 52 U.S. Code, sec. 21083(a)(5)(B)(i) (2024).

Minnesota statutes, however, require that verification be completed within 10 days.¹⁴ In addition, the Office of the Secretary of State (OSS) has promulgated rules that guide the voter registration process. We discuss Minnesota’s voter registration requirements, including the extent to which OSS and counties comply with them, throughout the remainder of this report.

Roles and Responsibilities

There are many entities and individuals involved in voter registration. In the following section, we describe the roles and responsibilities of OSS and counties in the voter registration process.¹⁵

The responsibility for overseeing and administering voter registration in Minnesota is split between OSS and individual counties.

OSS establishes Minnesota’s voter registration infrastructure and develops the processes for registering applicants and checking eligibility. Counties, however, generally create and update voter registration records.

OSS. The Secretary of State is the chief election official in the state, but state law does not provide OSS the authority to enforce county implementation of voter registration laws or otherwise oversee counties’ voter registration activities. As required by federal and state laws, OSS is responsible for developing and maintaining a centralized voter registration system to facilitate voter registration in the state.¹⁶ OSS has created the Statewide Voter Registration System (SVRS) for counties to create and update voter registration records. OSS must transmit certain voter information to counties to allow them to process applications and maintain accurate voter registration records, including information OSS receives from other agencies (regarding applicant identity and eligibility).¹⁷

In addition, OSS provides guidance and resources to assist with voter registration. For example, OSS certifies and trains county election staff in election administration. The office also provides county election staff guidance on how to process and update voter registration records. Lastly, OSS develops materials such as the online and paper voter registration forms and publishes information about elections.

Counties. In each county, the county auditor serves as the “chief registrar of voters and the chief custodian of the official registration records.”¹⁸ Statutes require county election staff to create and maintain accurate voter registration records in SVRS. For example,

¹⁴ *Minnesota Statutes* 2025, 201.121, subd 1(c).

¹⁵ We focused our evaluation on OSS and counties. Other participants in voter registration include election judges, municipal staff, voter registration drive organizers, and other state agencies.

¹⁶ *52 U.S. Code*, Ch. 209 (2024); and *Minnesota Statutes* 2025, 201.021.

¹⁷ *Minnesota Statutes* 2025, 201.13, subds. 1, 1a, and 3; 201.145, subds. 2–5; and 201.161, subd. 6.

¹⁸ *Minnesota Statutes* 2025, 201.021. Throughout this report, we refer to county auditors and the staff who perform election-related activities as “county election staff.”

county election staff must (1) process new registration applications, (2) verify the identity and residency of applicants, (3) challenge the voter registration records of ineligible applicants, and (4) identify and remove duplicate records.¹⁹ In addition, county election staff are responsible for preparing voter rosters ahead of an election.

Lastly, county election staff oversee the training of local election judges who administer elections at polling places on election day. Election judge duties include registering voters who did not register in advance of the election.

Voter Registration Overview

In Minnesota, statutes require an individual to register prior to voting in any election held in the state, including primary, general, special primary, or special election.²⁰ An eligible individual may register prior to or on election day.

Registration Methods

Minnesota offers a variety of methods for an individual to register to vote either before or on election day.

Before election day, an individual may register to vote (1) automatically when applying for a driver's license, state ID, or learner's permit; (2) by using an online application form; or (3) by submitting a paper application by mail, in person to their county election office or OSS, or at a voter registration drive. *On election day*, an individual can register at their polling place. Individuals may also submit a registration application when they submit an absentee ballot, which counts as election-day registration. We describe these methods below.

Before Election Day

Automatic voter registration (AVR). An individual will be automatically registered to vote if they present citizenship-affirming documentation when applying for or renewing a credential issued by the Department of Public Safety's Driver and Vehicle Services Division (DVS).²¹ Upon the mailing of a notice informing them that they have been registered through AVR, applicants have 20 days to opt out of being registered to vote.

Online. An applicant may apply online through OSS's website. The online application form requires the applicant to provide an email address and identification number (either a driver's license number or the last four digits of the applicant's Social Security number).

¹⁹ *Minnesota Statutes* 2025, 201.121, subd. 1(a), (e), and (f), and subd. 2; 201.145, subds. 2(d), 3(c), and 5(c); and 201.171.

²⁰ *Minnesota Statutes* 2025, 200.015; and 201.018.

²¹ DVS-issued credentials include driver's licenses, state ID cards, and learner's permits. For simplicity, we use the term "driver's license" in this report to encompass all DVS-issued credentials.

Paper. An applicant may submit a paper application by mail, in person at their county’s election office or OSS, or at a voter registration drive. The application must contain either a driver’s license number, the last four digits of the applicant’s Social Security number, or a statement that the applicant does not have either number.

Election Day

Election-day registration (in person). A voter may register to vote on election day by submitting a paper application or its equivalent to an election judge at their polling place.

Absentee registration. Election-day registration includes absentee registration applications. If an individual is not registered and wishes to vote by absentee ballot, they must submit a registration application with their ballot. Absentee registration applications go through the same process as election-day registrations. In both cases, the application to register occurs on the same date the voter casts their ballot.²²

Registration Documentation

Voters must provide different documentation depending on the method they use to register to vote.

As Exhibit 1.2 shows, each of the four main registration methods has slightly different documentation requirements. For example, both online and paper applications require a driver’s license number or the last four digits of a Social Security number, if the applicant has been issued one of those numbers. The paper application, however, provides an opportunity for someone to disclose that they have not been issued either number, while the online application requires an identification number to proceed.

Voter registration applicants do not need to present citizenship-affirming documentation, unless they apply through AVR when applying for or updating a driver’s license.²³ Neither federal nor state law permit counties to request or examine citizenship-affirming documentation before allowing the applicant to register to vote. When an applicant completes a registration application, they attest to their citizenship by checking a box on the registration form.

²² Absentee registration applications count as election-day registrations for the purposes of our data analysis in this report.

²³ “Citizenship-affirming documentation” is a document that proves both the individual’s identity and that they are a U.S. citizen, such as an original U.S. birth certificate, valid U.S. passport, Minnesota Tribal ID card, or naturalization certificate.

Exhibit 1.2 Voter Registration Documentation Requirements

Registration Method	Type of Documentation
Online	<ul style="list-style-type: none"> • Driver's license number, or • Last four digits of their Social Security number
Paper	<ul style="list-style-type: none"> • Driver's license number, or • Last four digits of their Social Security number, or • Attestation that the applicant has not been issued either number
AVR	<ul style="list-style-type: none"> • Citizenship-affirming documentation^a
Election day ^b	<ul style="list-style-type: none"> • Driver's license, or • Any document approved in statute or by OSS through rulemaking as proper identification and proof of residency

^a AVR applicant records include driver's license numbers by default, since they result from driver's license transactions. Applicants provide their proof of citizenship to DVS staff (or a driver's license agent appointed by the Department of Public Safety) during the driver's license transaction; neither OSS nor counties review citizenship-affirming documents.

^b Election-day registration includes absentee registration applications.

Source: Office of the Legislative Auditor and *Minnesota Statutes 2025*, 201.061, subs. 1(a)(2) and 3(a)(1)–(2); 201.071, subd. 1; 201.161, subs. 1(a)(1) and 3(a); and *Minnesota Rules 8200.5100*, as amended, and 8200.9310, subp. 2(A)(1); see 50 *State Register*, p. 971 (2026). The 2026 amendments to these rules did not substantively affect our analysis.

To register on election day, an applicant must present proof of residency to an election judge at their polling location. For example, as shown in the box to the right, an applicant may present a driver's license with their current name and address or present photo identification with an approved document, such as a utility bill, that shows their current name and address. The applicant must then complete a voter registration application, sign an oath attesting to their eligibility to vote, and sign the voter roster.



Proof of Residency on Election Day

- Identification with current name and address
- Notice of late registration from the county
- Photo identification plus approved document with current name and address
- Photo identification plus student housing list
- Valid registration in the same precinct if the applicant moved within the precinct or changed names
- Voucher – registered voter in precinct who can confirm voter's residence in precinct
- Voucher – staff person of a residential facility who can vouch for the facility's residents

— ***Minnesota Statutes 2025*, 201.061, subd. 3; and *Minnesota Rules 2025*, 8200.5100, as amended; see 50 *State Register*, p. 971 (2026)**

Registration Process

Processing voter registration applications involves confirming an applicant's identity, residency, and conformance with certain eligibility requirements.

An individual who wishes to vote in Minnesota must first submit a voter registration application.²⁴ An applicant must include in the application their name; date of birth; address; a driver's license number or the last four digits of their Social Security number, if they have one; and a signature. The applicant also must affirm that they are a U.S. citizen and that they meet other eligibility requirements.²⁵ Minnesota statutes require the applicant to submit their application at least 21 days prior to an election in order to be registered in advance for that election.²⁶ If the applicant does not submit their application in time, they must register on election day when they arrive at their polling location.

We provide a general overview of the application processing steps below. As we discuss in the next section, the order of the steps OSS and counties take to process and verify an application varies depending on the registration method.

Application review and entry. County election staff review each application for completeness. Minnesota rules require county election staff to attempt to obtain any needed information from the applicant if the application is missing required information.²⁷ County election staff also determine whether the applicant already has a voter registration record in the SVRS database.²⁸ If an applicant does not already have a voter registration record in the state's database, county election staff create a new record by entering the applicant's information into the system. Once county election staff create a voter registration record, the applicant becomes a registered voter.

Eligibility checks. SVRS cross checks the registered voter's information with data from other agency databases to make sure that the voter does not have a disqualifying condition. Disqualifying conditions include, for example, being incarcerated for a felony or being under a guardianship that involved the removal of voting rights.

Identity and residency verification. County election staff must verify the registered voter's identity (that they are who they say they are) and residency (that they live where they say they live) before they may vote.²⁹ To verify a voter's identity, SVRS checks the voter's information against databases from other agencies; county election staff review the results of those checks. To verify a voter's residency, county election staff mail a nonforwardable postal verification card (PVC) to the residential address that the voter provided in their application. If the postcard is not deliverable, the U.S. Postal

²⁴ As noted in the previous section, an applicant may submit their application in several ways.

²⁵ As noted in the previous section, AVR is the only voter registration method where an applicant must provide citizenship-affirming documentation. County election staff do not review citizenship-affirming documentation.

²⁶ *Minnesota Statutes* 2025, 201.061, subd. 1(b).

²⁷ *Minnesota Rules* 2025, 8200.2900.

²⁸ SVRS is the state database that contains a list of all registered voters in the state, in accordance with federal and state requirements. *52 U.S. Code*, sec. 21083(a) (2024); and *Minnesota Statutes* 2025, 201.021.

²⁹ We discuss these verification processes further in Chapter 2.

Service returns it to the applicable county; county election staff must then challenge the voter registration record.

Voter rosters and statuses. Counties use a list of registered voters, known as a “roster,” to identify voters on election day. Each individual with a voter registration record in SVRS has a voter status label that indicates the current status of their voter registration record. Individuals with voter statuses of Active and Challenged are considered registered voters and appear on a county’s voter roster. Active voters can vote after arriving at their polling place and signing the roster.

If a voter registration record’s voter status is Challenged, a challenge notation appears next to the voter’s name in the county’s voter roster. Voters who are Challenged may be eligible to vote, but they must answer certain questions and may need to provide documentation to clear their challenge prior to voting. By contrast, if an individual’s voter status is Inactive, they are not considered registered and must reregister prior to voting. Exhibit 1.3 defines these and other voter statuses and shows the number of individuals with each voter status as of January 2026.

Exhibit 1.3
SVRS Voter Statuses

Voter Status	Description	Total Records
<i>Registered Statuses</i>		
Active	Individual is fully registered and eligible to vote.	3,725,698
Challenged	Individual is registered, but needs to provide additional documentation or answer certain questions before they may vote.	<u>33,083</u>
Total records with a registered status		3,758,781
<i>Nonregistered Statuses</i>		
Deceased	Individual has died.	836,264
Deleted	County election staff deleted a voter registration record after identifying duplicate records and merging their contents, or in other limited circumstances.	435,966
Inactive	Individual’s voter status is no longer Active, for example, because they moved out of state or have not voted for a prescribed amount of time.	1,661,360
Pending	Individual is either preregistered as a 16- or 17-year-old, or the registration is within the 20-day opt-out period for AVR.	<u>133,722</u>
Total records with a nonregistered status		3,067,312

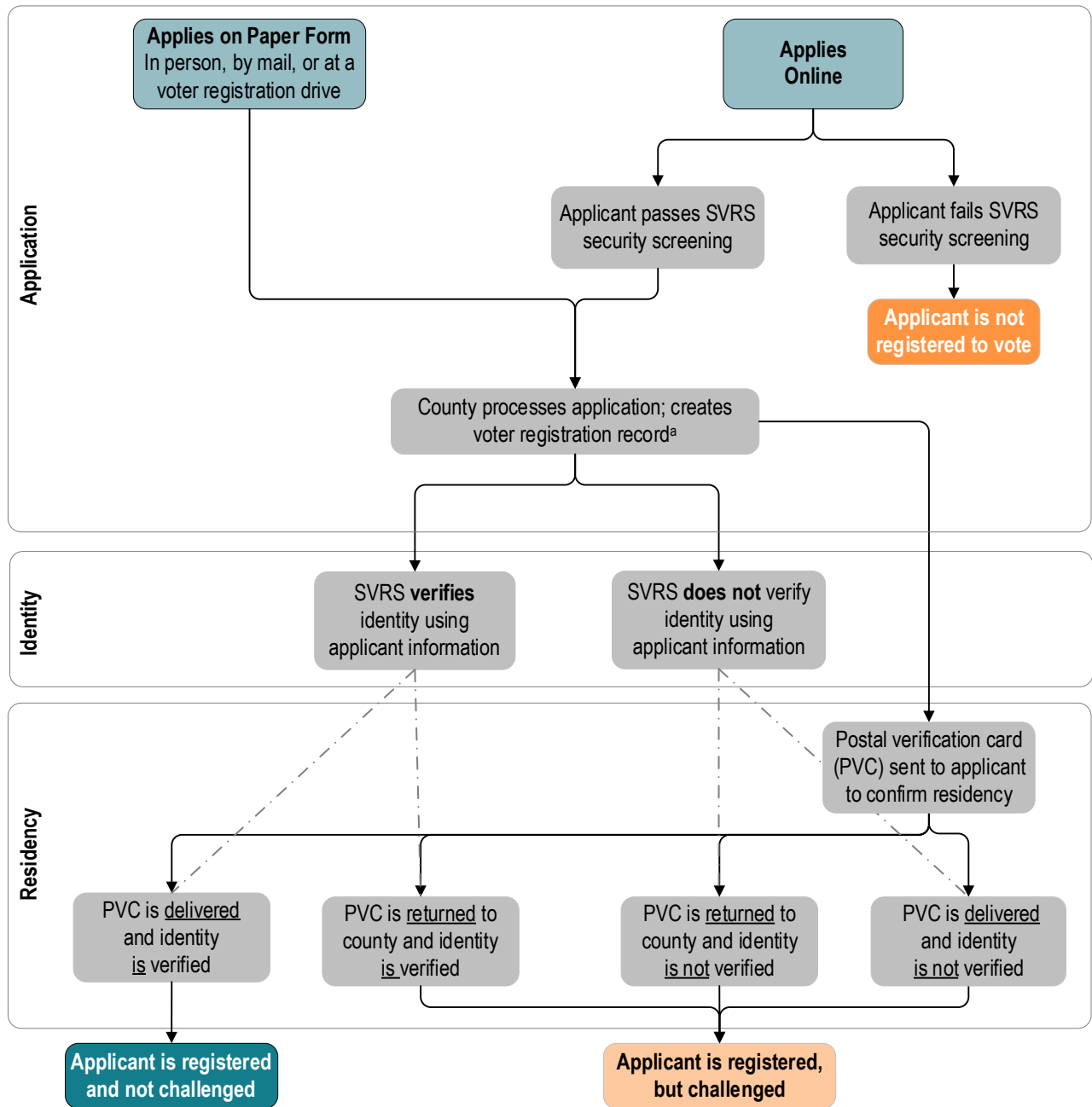
Note: The table shows the number of SVRS records with each voter status as of January 2026.

Source: Office of the Legislative Auditor, analysis of SVRS data, January 2026.

The order of the steps required to process voter registration applications differs depending on the registration method.

Exhibit 1.4 illustrates the process of registering voters who apply through each of the four main application methods: using a paper form, online, automatically through a DVS transaction, and in person on election day. The exhibit shows that for each of the four methods, there is a different sequence of events that occurs before the county creates a voter registration record in SVRS.

Exhibit 1.4
Voter Registration Process (Paper and Online Applications)

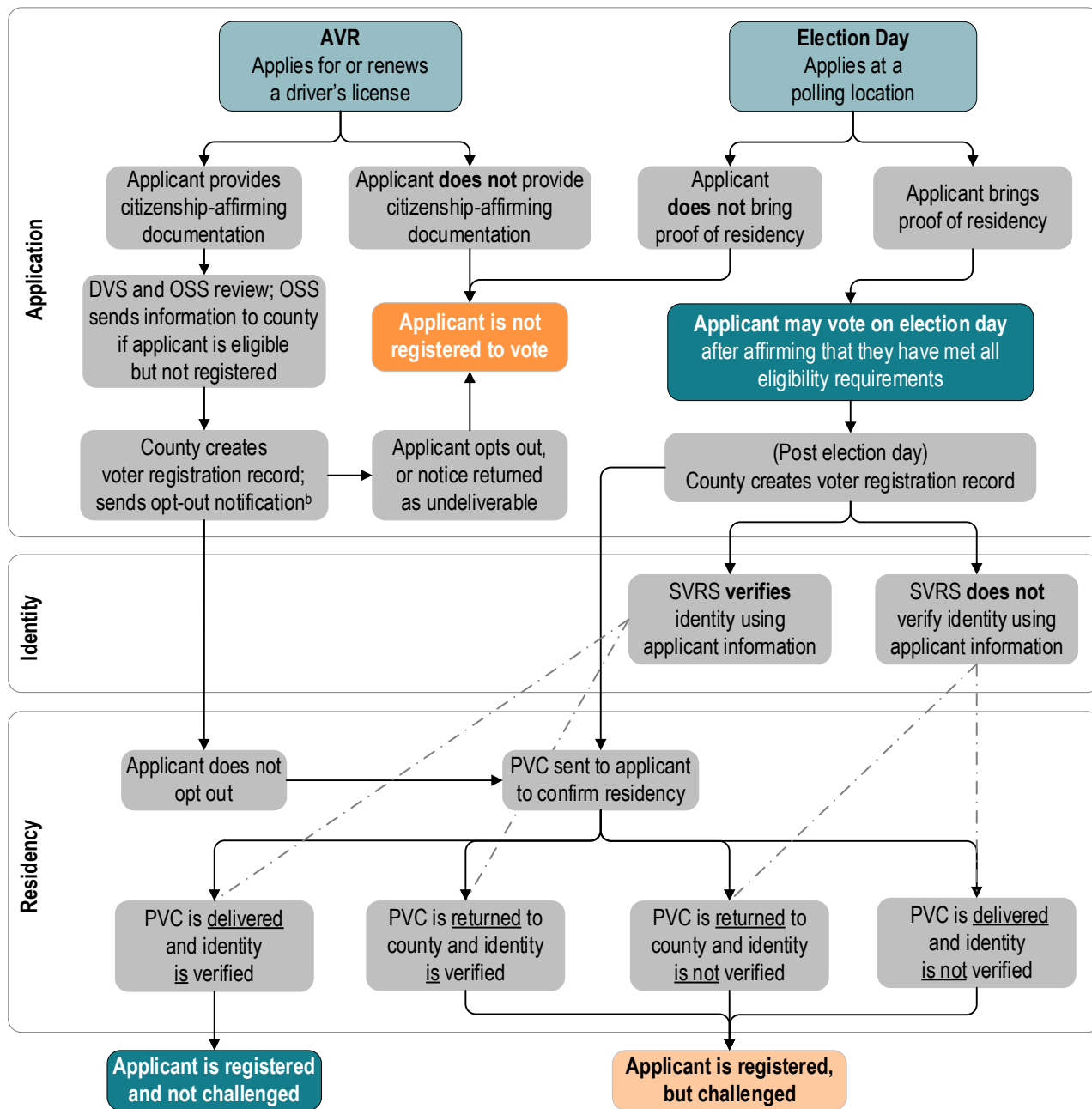


Notes: A registered voter has a voter status of Active as soon as county election staff enter the voter registration record in SVRS. However, the voter registration record may become challenged if the applicant does not pass identity and residency verification. For an applicant who applies using a paper form, online, or in person on election day, identity and residency verification occur concurrently.

^a For paper applications, counties manually enter applicant information into SVRS. For online applications, SVRS automatically creates the record and queues it for county review. The county then reviews the application before submitting it for identity and residency verification.

Exhibit 1.4 – Continued

Voter Registration Process for AVR and Election-Day Applications



^bWhen county election staff create a voter registration record for an AVR applicant, they set the record's voter status to Pending. County election staff then queue an opt-out notice to be sent to the applicant. If the applicant does not opt out within a certain number of days, SVRS automatically changes the voter status to Active and queues a PVC to be sent to the applicant. If the applicant chooses to opt out, county election staff change the voter status to Inactive.

Source: Office of the Legislative Auditor.

As Exhibit 1.4 demonstrates, the steps for registering new voters vary based on the method by which the applicant completes their application. For **paper applications**, county election staff enter application information into SVRS as the first step; SVRS triggers both the identity and residency verification processes (which take place concurrently) once the voter registration record exists in the system. **Online applications**, on the other hand, go through a security check to determine whether the information submitted matches information in a government database, as required by statutes.³⁰ If an application fails the security check, the applicant is not registered to vote; if the application passes, county election staff create a voter registration record for the applicant and process the application in the same manner as someone who applied using a paper form.

For **AVR applications**, identity has already been verified by DVS before the record is sent to OSS. SVRS automatically performs eligibility checks before providing applicant information to the counties. Once a county receives applicant information from DVS, county election staff create the voter registration record and queue an opt-out notice for the applicant. If the applicant does not opt out within the allowed time frame, SVRS queues a PVC to be sent to the applicant.

For **election-day registration**, OSS and county election staff verify voter registration applications through the same process as online and paper applications submitted prior to the election, except that the application entry and verification processes occur after the applicant has voted. If county election staff cannot verify an applicant's identity or place of residence, they mark that applicant's voter registration record as challenged for the next election.³¹

³⁰ *Minnesota Statutes* 2025, 201.061, subd. 1(c).

³¹ Further, *Minnesota Statutes* 2025, 201.121, subd. 3(a), requires that county election staff who do not "receive or obtain satisfactory proof of an individual's eligibility to vote must immediately notify the county attorney of all of the relevant information."

Chapter 2: New Applications and Voter Verification

An individual may register to vote by submitting an application to the county they live in, the Office of the Secretary of State (OSS), or an election judge on election day; an individual may also be registered automatically when applying for a driver's license or similar credential. While OSS establishes processes for voter registration, counties process voter registration applications and determine whether to register the applicants to vote. The voter registration processes these entities must follow can impact an applicant's experience at the polls on election day.

In this chapter, we evaluate OSS's and county election staffs' handling of new voter registration applications, including application entry, identity verification, and residency verification.

Key Findings in This Chapter

- The Office of the Secretary of State (OSS) has generally established appropriate procedures that counties are expected to follow when processing voter registration applications.
- Counties followed the residency verification process correctly for 99 percent of applicants, most of whom were verified entirely automatically. Among the applicants counties manually reviewed, counties either inaccurately assigned voter statuses or failed to document their rationale in more than one-third of the cases we reviewed.
- While OSS's report on PVCs returned after an election may meet statutory requirements, the report offers limited value.

OSS has generally established appropriate procedures that counties are expected to follow when processing voter registration applications.

We explained in Chapter 1 that OSS does not have oversight authority over counties' application processing. However, OSS is responsible for establishing Minnesota's voter registration infrastructure and developing the processes for registering applicants and checking their eligibility.¹ These processes and procedures—when implemented correctly—help counties register voters in accordance with law.

Consistent with its role, OSS has developed procedures for county election staff to use to create new voter registration records in the Statewide Voter Registration System (SVRS) and to verify applicants' identities and residencies. To help counties learn and follow the procedures, OSS provides annual training and has published documents providing overviews or step-by-step instructions.² The procedures that OSS has established related to the processing of voter registration applications align with requirements in the federal

¹ *Minnesota Statutes* 2025, 201.021, and 201.221, subd. 2.

² OSS has produced specific guidance for county election staff on a wide variety of topics, including but not limited to creating voter registration records in SVRS and verifying applicants' identities and residencies. We discuss OSS guidance further in Chapter 3.

and state laws that we reviewed as part of this evaluation. In this chapter, we discuss OSS’s procedures, the extent to which counties have implemented them appropriately, and their impact on voter registration.

Voter Registration Applications

When a county receives a voter registration application, OSS guidance directs county election staff to first determine whether the applicant has an existing voter registration record in SVRS. If the county election staff find an existing record, they must update the record to reflect any changes—such as home address—identified in the most recent application. If county election staff do not find an existing voter registration record, they must create a new voter registration record using the information provided in the application.

The number of voter registration applications (including new applications and updates) varied by year from 2018 through 2025. The greatest number of applications were submitted during presidential election years, as shown in Exhibit 2.1.



Roles in Processing New Voter Registration Applications

OSS

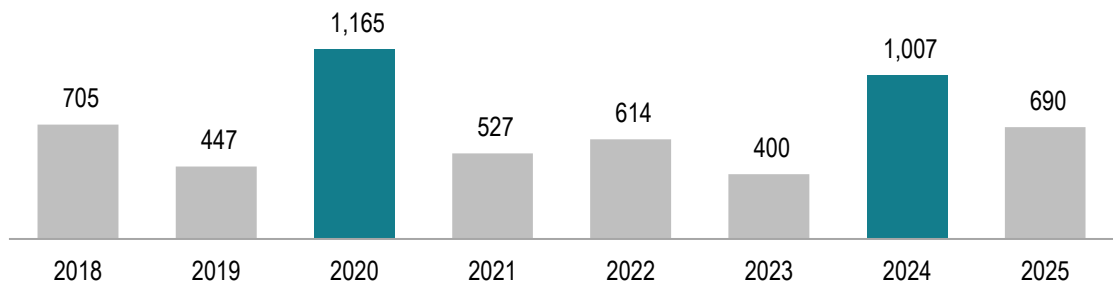
- Provides guidance to counties
- Provides an online registration system for prospective voters
- Maintains SVRS, including voter registration record search functions

Counties

- Search for existing voter registration records
- Update information (if a record exists)
- Create new record (if a record does not exist)

Exhibit 2.1
Voter Registration Applications, 2018–2025

In Thousands



Note: Presidential election years are indicated with teal bars.

Source: Office of the Legislative Auditor, analysis of SVRS data.

Our analyses in this chapter focus on new voter registration applications received between July 1, 2024, and November 5, 2024.³ We chose these dates to capture new applications prior to, and on the date of, the August 13, 2024, state primary and the November 5, 2024, general election.

Online Application

As noted in Chapter 1, an individual may register to vote in a number of ways, including via paper and online applications. Statutes require OSS to maintain a secure website for the purpose of submitting voter registration applications online.⁴ In its 2018 *Voter Registration* evaluation, the Office of the Legislative Auditor (OLA) recommended improvements to the online voter registration application.⁵ Specifically, we recommended that OSS (1) add a check to see whether the individual is already registered, and (2) provide a review screen at the end asking the registrant to double check the information they submitted.

UPDATE TO 2018 REPORT

In its 2018 *Voter Registration* report, OLA recommended that OSS improve the online voter registration application.

RECOMMENDATION IMPLEMENTED

OSS improved the online voter registration application as OLA recommended.

OSS has made the suggested changes to the online voter registration application. The review screen at the end of the application may help applicants catch errors in their submissions; as we discuss later in this chapter, accurate information is critical for the identity and residency verification processes. OSS has also implemented a check to prevent individuals who are already registered from submitting additional applications. When an applicant completes their review, the system checks for matching voter registration records. If a record exists, the applicant sees a screen that says that they are already registered and provides the address of their polling place. OSS staff said that this change to the online application form has helped reduce the number of duplicate registrations.

County Application Processing

Minnesota statutes establish two deadlines by which voter registration applications must be entered into SVRS. For applications received prior to election day, statutes require counties to enter voter information into SVRS within 10 days.⁶ For election-day registrations, statutes require counties to enter applications into SVRS within 42 days after the election.⁷

³ “New” applications refer to applications from individuals for whom there was no previous record of a Minnesota voter application. If an individual applied more than once between July 1, 2024, and November 5, 2024, (for example, by mail and then again in-person on election day) we only consider the earliest application to be “new.”

⁴ *Minnesota Statutes* 2025, 201.061, subd. 1(a)(2).

⁵ Office of the Legislative Auditor, Program Evaluation Division, *Voter Registration* (2018), 21.

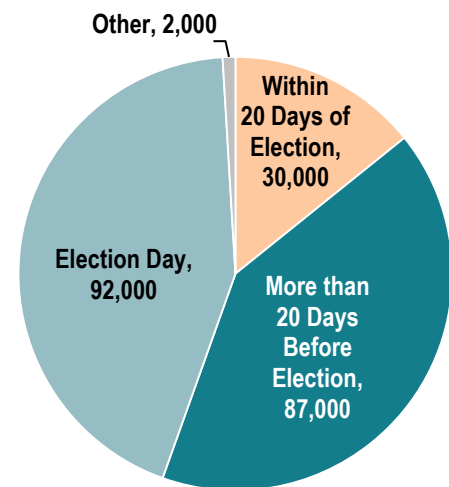
⁶ *Minnesota Statutes* 2025, 201.121, subd. 1(a).

⁷ *Minnesota Statutes* 2025, 201.121, subd. 1(a). Counties may request from OSS an extension for processing election-day applications before the deadline has expired. Applications accompanying absentee ballots are also considered election-day registrations.

Although statutes limit when individuals may register to vote, this limit does not affect counties' obligations to enter applications into SVRS. Statutes state that an individual may register to vote "at any time except during the 20 days immediately preceding any regularly scheduled election."⁸ At the same time, counties must enter or update the voter registration record for all applications submitted prior to election day within 10 days of submission, even if they are received within "20 days immediately preceding" an election. OSS guidance requires county election staff to enter all applications into SVRS but not "register" applicants who submitted their applications within 20 days of election day.⁹ County election staff must place a voter registration application in a "pending" status if it is received after the 20-day registration cutoff.

More than one-half of the 211,000 new applicants in our scope applied before election day. As shown in Exhibit 2.2, about 87,000 individuals applied before the registration cutoff, and 30,000 applied within 20 days of an election. Election-day registration (either associated with an absentee ballot application or an application received in-person on election day) accounted for 92,000 applications. Exhibit 2.2 also shows that roughly 2,000 new applicants applied on an election day—August 13 or November 5, 2024—using registration methods other than election-day registration, such as online applications.

Exhibit 2.2
Timing of New Voter Registration Applications, July 1, 2024, Through November 5, 2024



Notes: "Other" includes individuals who applied on an election day using a method other than election-day registration. Numbers are rounded to the nearest thousand.

Source: Office of the Legislative Auditor, analysis of SVRS data.

Timeliness

It is challenging to analyze the timeliness of counties' entry of voter registration applications into SVRS. Evaluating timeliness requires knowing the date that the applicant submitted the application; however, SVRS does not contain a field for the submission date.

Despite these challenges, we analyzed the timeliness of application entry for **about 57,000 new applicants who applied either online or in person** prior to a 2024 statewide election. We also analyzed counties' timeliness in entering all 92,000 new election-day applications.

⁸ *Minnesota Statutes* 2025, 201.061, subd. 1(a).

⁹ Office of the Secretary of State, Elections Division, *Roster Preparation Information – November 5, 2024 State General*, 2.

While counties processed 96 percent of new voter registration applications we reviewed within the time frames established in law, they were often late to process applications received within 20 days of an election.

Applications received more than 20 days before election. Counties received about 49,000 new online and in-person applications prior to the 20-day registration cutoff. County election staff entered 97 percent of these new applications into SVRS before the 10-day statutory deadline for data entry; they did not enter the remaining 3 percent before the deadline. Late entry in SVRS did not impact most applicants; however, county election staff did not enter 1 percent of all online and in-person applications before the applicable election day.

Applications received within 20 days of election. Counties received nearly 8,000 online and in-person applications within 20 days of the next election. County election staff entered 55 percent of these new applications into SVRS before the 10-day statutory deadline; they did not enter the remaining 45 percent before the deadline.

When an individual applies within 20 days of the election, counties are supposed to enter them into SVRS and send a “notice of late registration” informing them that they are not registered and that they may register using election-day registration at their voting location.¹⁰ When county election staff do not enter applications in SVRS in a timely manner, they reduce the chance that the applicant will receive the required notice of late registration before the election and be able to use the notice as proof of residency on election day.

Election day applications. Counties received about 92,000 new election-day voter registration applications for the 2024 state primary or general election, or along with an absentee ballot for those elections.¹¹ County election staff entered 99 percent of these applications into SVRS within the required time frame.

RECOMMENDATION

Counties should process all voter registration applications within the time frames established by law.

Counties should process all of the voter registration applications they receive by their respective statutory deadline. By processing applications on time, counties ensure that applicants’ identities and residencies are verified in a timely manner and that applicants who applied before the registration cutoff will be able to vote on election day without unnecessary delays.

¹⁰ *Minnesota Rules* 2025, 8200.3110(A).

¹¹ As noted previously, counties process voter registration applications received with absentee ballots using election-day registration processes.

With respect to applications the county received within 20 days of the election, timely SVRS entry is a necessary step in ensuring that applicants receive a notice of late registration. Not only is this notice required by law, but it helps the applicants prepare for election day. Some of these applicants might expect their name to be listed on the roster alongside the other registered voters at the polls. The notice can help ensure that these applicants are prepared with the proper documentation to go through the election-day registration process before voting.

Identity Verification

When an individual registers to vote, OSS and counties must verify that the applicant is who they say they are.¹² Doing so involves comparing identifying information from an individual’s application with data from the Department of Public Safety’s Driver and Vehicle Services Division (DVS) and the Social Security Administration (SSA).

County election staff participate in the identity verification process for all registration methods except automatic voter registration (AVR). As we discussed in Chapter 1, DVS completes identity verification for voter registration applications submitted through AVR before counties receive the application. For applications submitted on paper, online, or on election day, OSS and counties verify the applicant’s identity using the process shown in Exhibit 2.3 and described below.



Roles in Identity Verification for New Voter Registrations

OSS

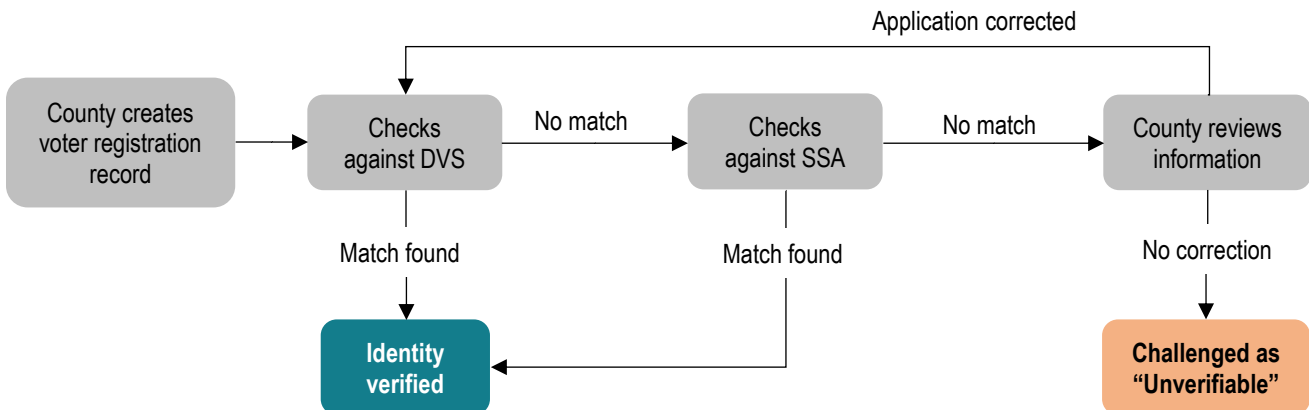
- Provides guidance to counties
- Maintains SVRS, including processes to match voter registration records to DVS and SSA data

Counties

- Review possible matches provided by SVRS
- Queue records for reverification as needed
- Challenge records that cannot be verified

Exhibit 2.3

Identity Verification Process: Paper, Online, and Election-Day Applications



Source: Office of the Legislative Auditor.

¹² *Minnesota Statutes* 2025, 201.121, subd. 1(c)-(d); and *Minnesota Rules* 2025, 8200.9310, subp. 2.

At the end of the verification process, every voter registration record in SVRS should be marked with one of four verification statuses. As explained in the box to the right, records can be verified based on Minnesota driver's license or SSA data. For records not verified through an exact match with one of those data sources, county election staff may verify or not verify registration records based on their manual review of identifying information.

In Minnesota, the identity verification process begins with SVRS transmitting the applicant's name, date of birth, and driver's license number to DVS for comparison with driver's license data.¹³ SVRS does this automatically when a county creates a new voter registration record. If DVS indicates that the applicant's identifying information is an exact match for a record in its driver's license database, SVRS automatically verifies the applicant's identity and sets the record's verification status to "MDL Verified."¹⁴

DVS may also return one or more driver's license records that partially match the information provided by the applicant. OSS directs county election staff to manually compare the names, dates of birth, and driver's license numbers on the voter and DVS records. If they do not match due to an obvious error in the voter registration record, such as the use of a nickname or a missing letter or number, the county election staff may reasonably conclude that the records are for the same person and mark the applicant's verification status as "Auditor Verified."

If the applicant's information does not match any records in the DVS data and the application contains the last four digits of the applicant's Social Security number, county election staff queue the application for matching with data from SSA's Help America Vote Verification system. If SSA indicates that it found an exact match based on the applicant's name, date of birth, and last four digits of the Social Security number, SVRS automatically verifies the applicant's identity (with a verification status of "SSN Verified"). SSA does not provide partial matches.



Verification Statuses in SVRS

MDL Verified: SVRS applies this status automatically if applicant information matches exactly with Minnesota driver's license (MDL) data.

SSN Verified: SVRS applies this status automatically if applicant information matches exactly with SSA data.

Auditor Verified: County election staff add this status when they can reasonably conclude that one of the partially matched records provided by DVS is the same individual as the applicant.

Auditor Failed Verification: County election staff add this status when the applicant provided a driver's license or Social Security number, but:

- SVRS match processes resulted in no exact match, or
- SVRS provided partial matches with DVS data, but county election staff cannot reasonably conclude that they sufficiently match the information on the voter registration application.

¹³ Any DVS-issued credential—driver's license, learner's permit, or state identification card—can be used to verify an applicant's identity. For simplicity, we use the term "driver's license" to represent all DVS-issued credentials.

¹⁴ If an individual indicates on their paper application that they have not been issued a driver's license or Social Security number, and the other information provided does not result in a possible match with DVS data, the DVS verification process returns a verification status of "MDL Verified" with a notation of "no match." The applicant's voter status would be Active, but the voter registration record would contain a "See ID" notation.

Applications that lack an exact match with either DVS or SSA data appear in an SVRS queue for county election staff to review. County election staff must attempt to contact the applicant to verify information or correct the record if it contained errors or missing information that would have prevented a match.¹⁵ If county election staff subsequently make corrections to the voter registration record, they queue the record for another round of DVS and/or SSA matching. If county election staff determine (after one or multiple rounds of attempted verification) that an applicant's identity cannot be verified, they set the applicant's verification status to "Auditor Failed Verification."

An exact match with driver's license data was the most common verification method during the time frame we examined. Counties were able to use automatic DVS verification to verify information for 61 percent of those submitting new applications from July 1, 2024, through November 5, 2025.

Identity Verification Accuracy

The *verification status* refers to whether and how an individual's identity is verified; the *voter status* provides information about the current status of an individual's voter registration record. As explained in Exhibit 1.3, voter statuses include Active and Challenged, among others. State law requires counties to challenge voter registration records if staff are unable to conclude that the information in the individual's application matches a DVS driver's license record or an SSA record.¹⁶ In SVRS, county election staff mark these records with a verification status of Auditor Failed Verification, which results in SVRS automatically changing the record's voter status to Challenged with a status reason of "Unverifiable."¹⁷

This section describes the various decisions county election staff made and the extent to which they accurately updated applicants' voter statuses after initiating and completing the identity verification process.¹⁸ We analyzed the voter registration records for about 156,800 individuals who submitted new voter registration applications from July 1, 2024, to November 5, 2024.¹⁹

¹⁵ *Minnesota Rules* 2025, 8200.9310, subp. 2(C).

¹⁶ *Minnesota Statutes* 2025, 201.121, subd. 1(e) and (f).

¹⁷ In SVRS, an individual has just one voter status (such as Active or Challenged) but can have many "status reasons." For example, an individual could have a voter status of Challenged with status reasons of both "Unverifiable" and "Postal Return." If the individual subsequently provides a corrected driver's license number and the county is able to verify the individual's identity, the county would remove the Unverifiable status reason; however, the individual would remain Challenged due to the Postal Return status reason still on the voter registration record.

¹⁸ "Accurately updating the voter status" means (1) changing a voter status to Challenged if the applicant's identity could not be verified, (2) keeping the voter status as Active if the verified applicant's identity was verified, or (3) changing the voter status to Active if the applicant was previously unverified but became verified. We based our assessment of accuracy on records following a reasonable pattern of verification status and voter status updates. We evaluated whether each record's voter status was accurately updated between the individual's application date and June 30, 2025.

¹⁹ This analysis does not include all 211,000 individuals who completed a voter registration application during this period. It excludes most AVR records, as SVRS generally does not contain the same type of identity verification information for AVR applications. As we discussed previously, AVR applications are based on DVS data, meaning the applicant's identity is verified before counties received their information to enter into SVRS. Further, counties did not process some applications during the time frame we reviewed.

Counties followed the identity verification process correctly for 99.9 percent of applicants, most of whom were verified without county involvement; among the remaining applicants, counties accurately assigned voter statuses in 98 percent of the cases we reviewed.

More than 99 percent of the records we reviewed had accurate voter statuses as a result of identity verification, as shown in Exhibit 2.4. In other words, county election staff almost always challenged unverifiable records and activated (or kept active) verifiable records. The vast majority (94 percent) of applicants had their identity verified automatically, without county staff involvement. Among the 6 percent of voter registration records that county election staff manually reviewed, we found that they accurately assigned voter statuses to 98 percent of records.

**Exhibit 2.4
Identity Verification Processing Actions**

Number of Records (Rounded to the Nearest 100)	Residency Verification Method	OLA Determination
146,800	Automatically verified	✓ Accurate
9,800	County action required/Manually verified	✓ Accurate
		99.9% Accurate
200	County action required/Manually verified	X Not Documented
		0.1% Not Documented

Notes: This table summarizes the actions county election staff took to process about 156,800 unique voter registration records in SVRS that either counties or SVRS submitted for identity verification from the date of the individual's first entry into SVRS through the end of June 2025.

Source: Office of the Legislative Auditor, analysis of SVRS data, new voter registration applications submitted to counties from July 1, 2024, to November 5, 2024.

As shown in Exhibit 2.4, we found some processing outcomes that were not supported by other information in SVRS. The following paragraphs explain some of the situations we identified. We note, however, that counties have considerable discretion in updating voter registration records. We cannot say for certain whether the situations we observed represent inaccurate determinations or instances in which county election staff evaluated a record and made an appropriate decision without fully documenting their reasoning.

Voter statuses activated without documentation. County election staff activated some voter registration records after determining that they could not verify the applicant's identity. As an example, a county election staff person created a voter registration record in SVRS on August 19, 2024, and SVRS submitted the record to DVS for verification the same day. County election staff determined that the

applicant's identity could not be verified and assigned a Challenged voter status to the record on August 20, 2024. Nearly a month later, county election staff changed the voter status to Active without explanation and without resubmitting it through the identity verification process. As we explained earlier, state law requires a voter registration record to have a Challenged voter status if the county cannot verify an applicant's identity.²⁰

Voter statuses challenged without documentation. County election staff did not remove a Challenged voter status with the reason Unverifiable from some voter registration records after the applicants' identities were successfully verified.

Identity Verification Outcomes

To better understand whether the outcomes of the identity verification process differ by registration method, we reviewed a sample of applications to determine whether they matched DVS or SSA records. Using a group of 211,000 new applications submitted from July 1, 2024, to November 5, 2024, we identified whether applicants completed the identity verification process by June 30, 2025, or before submitting a second application, whichever came first.

Identity verification rates varied based on the registration method, ranging from 100 percent for those who applied online or through Automatic Voter Registration (AVR) to 94 percent for those who applied using a paper application.

Exhibit 2.5 shows that 100 percent of new online and AVR applications passed the identity verification process; these applications represented more than one-half of the voter registration records we reviewed. Of the approximately 8,300 individuals who applied using paper applications, 94 percent passed identity verification during the period we examined. Consistent with state law, those individuals who registered on paper and whose identity was not verified prior to election day had to clear the challenge on their voter registration record before they could vote.²¹

²⁰ *Minnesota Statutes 2025*, 201.121, subd. 1(e) and 1(f).

²¹ *Minnesota Statutes 2025*, 201.121, subd. 1(f). An applicant who fails identity verification is not necessarily ineligible to vote. Individuals may fail the identity verification process (sometimes repeatedly) due to an error in their application that prevented matching with DVS or SSA data.

Consistent with state law, Minnesota’s election-day registration process allows individuals to vote before their identity is verified through DVS or SSA; if an individual’s identity cannot subsequently be verified, counties must challenge their voter registration record.²² Exhibit 2.5 shows that 98 percent of election-day registrants passed identity verification after the election. As permitted by law, almost all election-day registrants voted, including almost all of the 2 percent who did not initially pass identity verification.

Exhibit 2.5 Identity Verification Rates of New Applications

Voter Registration Method	Total Number of Applications (Rounded to the Nearest 100)	Identity Verified
Automatic (AVR)	56,300	100%^a
Online	53,700	100^a
Paper	8,300	94
Regular (in-person delivery)	4,200	96
Mail-in	2,700	94
Registration drive	1,500	85
Federal post card application^b	600	98
Election day: In person	75,400	98
Minnesota driver’s license	52,800	100
Driver’s license plus utility or bank bill	11,800	96
Voucher	4,400	94
Student ID plus housing list	3,200	94
Passport plus utility or bank bill	1,300	90
Other documentation types	1,200	91
No documentation recorded	600	96
Election day: Absentee	15,900	98

Notes: The table reflects the identity verification outcomes for about 210,200 applications submitted from July 1, 2024, to November 5, 2024. It excludes nearly 1,300 applications we reviewed that did not complete the identity verification process. The nonbold rows represent subcategories of different application methods: the source for paper applications and the documentation provided for election-day registration.

^a OSS sends only verified AVR and online applications to counties for review and entry in SVRS, which is why this table shows that all of those applications were verified. An SVRS report on online voter registration applications showed that 4 percent of online applications failed the initial security check and were not sent on to counties. We discuss reasons that applicants failed to match with DVS or SSA data in the next section.

^b The federal post card application (which can be submitted on paper or online) is used by members of the military, their family members, and other U.S. citizens residing outside of the United States to register to vote, request an absentee ballot, and update contact information.

Source: Office of the Legislative Auditor, analysis of SVRS data, new voter registration applications submitted from July 1, 2024, to November 5, 2024.

²² *Minnesota Statutes* 2025, 201.018; 201.061, subd. 3(a); 201.121, subd. 1(a), (c), and (f); and *Minnesota Rules* 2025, 8200.5100, subp. 1, and 8200.9310, subp. 2. To register on election day, state law requires individuals to provide documentation or be vouched for. An election-day registrant who is challenged for an unverifiable identity after the election must provide the information required to clear the challenge before voting in a future election.

Identity Verification Using Social Security Data

As discussed earlier in this chapter, SVRS submits an applicant's name, date of birth, and the last four digits of their Social Security number to SSA if the applicant's identity cannot be verified using DVS's driver's license database. Unlike the DVS matching process, the SSA system does not return partial matches. If an applicant registers to vote using a spelling of their name other than the one SSA has on file (or the record sent to SSA contains an error in any field), the SSA system returns a result of "unmatched." OSS told us, for example, that names with hyphens or apostrophes may be difficult to match with SSA data. Therefore, the fact that an applicant does not match with the SSA database does not necessarily demonstrate that they are not who they say they are or that they are ineligible to vote.

When counties investigate unmatched records, they queue records to be resent to SSA; records may be sent to SSA multiple times using different name spellings or corrected information. During September 2024, OSS submitted to SSA records for more than **17,000 unique individuals**. Some applicants submitted multiple online applications, and some counties queued an applicant's information for verification multiple times. Combined, these submissions resulted in nearly **22,000 total SSA transactions**.

During the time frame we reviewed, 93 percent of the **unique individuals** matched with the SSA database and were verified by the end of the month. Because we focused only on transactions in the month of September, some of the 7 percent of unmatched records may have matched after the period we reviewed.²³ The applicants who eventually matched with SSA data included 109 individuals who initially did not match SSA data but later matched using corrected information; combined, they represented 252 transactions. While most applicants required just one or two SSA transactions, counties queued some applicants to be sent to SSA four or five times. In one example, demonstrated in Exhibit 2.6, a county queued an applicant's record for identity verification four times, each reflecting a minor correction to the first name or the last four digits of the applicant's Social Security number.²⁴

²³ Most, however, were online applications that failed OSS's initial security check. When an application fails the security check, counties do not receive the application, and OSS sends the individual an email advising them that their information was not verifiable.

²⁴ When a voter registration applicant does not match with either DVS or SSA data, rules require counties to attempt to obtain needed information by contacting the applicant. *Minnesota Rules 2025, 8300.9310, subp. 2(C)*.

Exhibit 2.6
Example SSA Transaction Pattern

First Name	Last Four Digits of Social Security Number	Transaction Date	SSA Response
Richard	2063	September 10	Unmatched
Rick	2063	September 12	Unmatched
Rick	2036	September 16	Unmatched
Richard	2036	September 18	Matched

Note: While we changed the details to protect the applicant’s identity, this pattern of SSA transactions represents a real example that occurred in September 2024.

Source: Office of the Legislative Auditor, analysis of OSS’s SSA transaction data, September 2024.

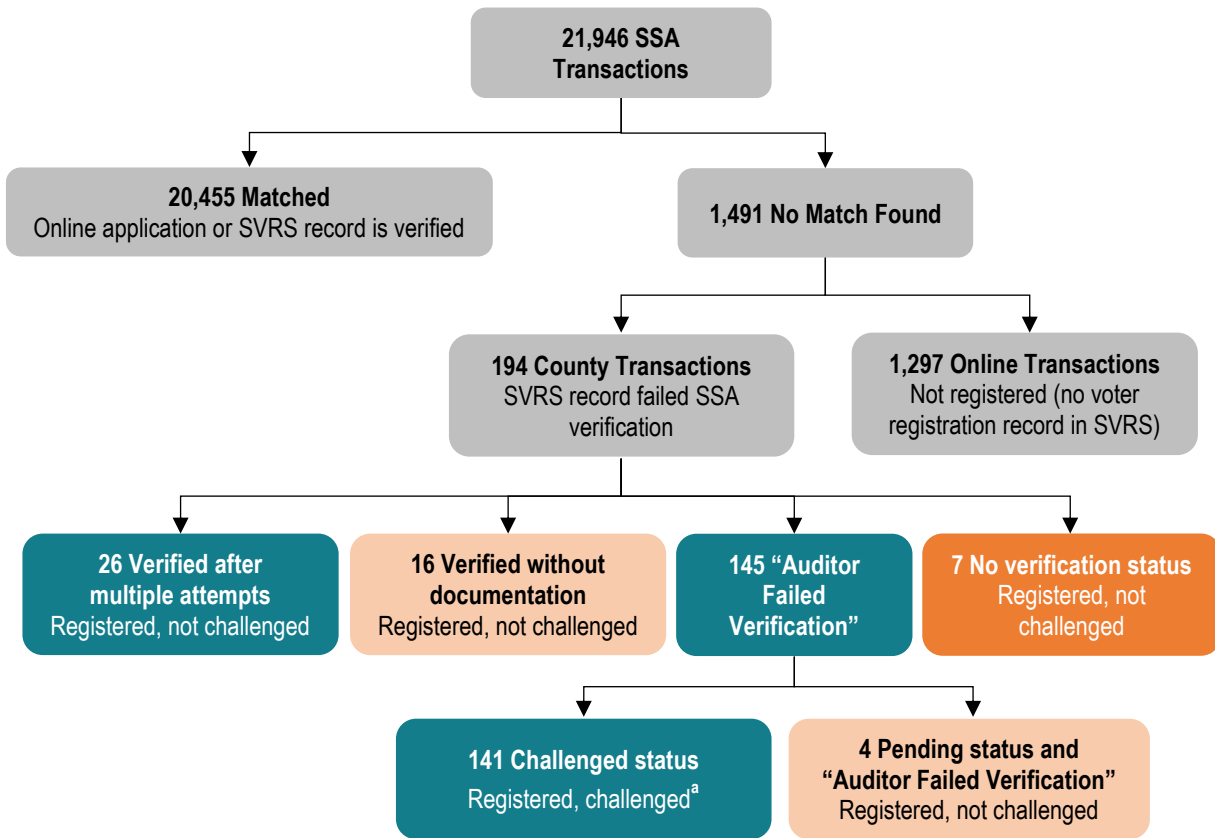
Counties and OSS appropriately handled all but 27 of nearly 22,000 SSA transactions in September 2024.

Among nearly **22,000 total SSA transactions** in September 2024, 93 percent of transactions resulted in a match. Of the almost 1,500 transactions that did not result in a match with SSA data, nearly 1,300 (87 percent) were online applications that OSS did not forward to counties; as a result, voter registration records were not created or updated for those applications.

Counties appropriately updated SVRS records for 167 of the 194 remaining transactions that did not match SSA data. As shown in orange in Exhibit 2.7, counties did not record any verification statuses for seven transactions that should have had a verification status of Auditor Failed Verification. For 16 transactions, counties added a verification status of Auditor Verified without documentation in the data indicating that the record had matched DVS or SSA data. For another four transactions, counties correctly added Auditor Failed Verification, but SVRS did not add a Challenged voter status.²⁵ OSS has since remedied the issue that led to these inaccurate statuses.

²⁵ These four applicants were preregistered 16- and 17-year-olds with Pending voter statuses. While it is appropriate that the records would have retained their voter statuses of Pending (rather than Challenged) until the applicant turned 18, SVRS did not (in 2024) assign a Challenged voter status as required when the unverifiable individual turned 18. OSS fixed this issue in August 2025, and two additional preregistered 16- or 17-year-olds from this population were challenged when they turned 18.

Exhibit 2.7
County Response to SSA Match Results, September 2024



Note: The exhibit excludes three transactions for which SSA returned an error; these were neither matched nor unmatched.

^a One of the 141 individuals in this box preregistered and had not yet turned 18 when this report was published. This individual remains in a Pending status, but should be marked Challenged (as were other preregistered individuals) when they turn 18.

Source: Office of the Legislative Auditor, analysis of OSS's SSA transaction data, September 2024.

Residency Verification

To vote in a Minnesota precinct, an individual must be a resident of that precinct.²⁶ “Residency” for the purpose of voting is the place where an individual lives, as opposed to an address used exclusively for a business or a PO Box. Rules state that an individual must include their home address on their voter registration application and may not include a separate mailing address (such as a PO Box), unless they are unable to receive mail at their residential address.²⁷

²⁶ *Minnesota Statutes 2025*, 201.016, subd. 1.

²⁷ *Minnesota Rules 2025*, 8200.2950.

To verify residency, statutes require counties to mail a notice indicating the individual's name, address, precinct, and polling place to each registered voter.²⁸ These notices of registration are known as postal verification cards (PVCs). PVCs cannot be forwarded; the U.S. Postal Service (USPS) must return the PVC to the county if it cannot be delivered to the applicant at the address provided. When counties receive a returned PVC, they must challenge the applicant's voter registration record.²⁹ County election staff have the option to send additional PVCs. If the second PVC is sent at least 60 days after the first PVC is returned and is also returned as undeliverable, county election staff must inactivate the voter registration record.³⁰

An individual may register to vote if they do not have a home. Statutes require that OSS's paper application allow an applicant who lacks a specified address to provide a physical description of their location of residence (such as cross streets).³¹ As of February 2026, 88 individuals statewide were registered with a description rather than an address.

An applicant must be sent a PVC even if they do not have a home address. If an applicant uses a physical description rather than a home address and USPS cannot deliver the PVC, county election staff will challenge the voter registration record. Rather than a description, some individuals experiencing homelessness use the address of a homeless shelter. However, OSS staff explained that many shelters do not accept mail on behalf of the residents; in these instances, the PVC would also be returned to the county.

Residency Verification Accuracy

In this section, we evaluate the decisions county election staff made as they processed PVCs for about 191,000 applicants who submitted new voter registration applications from July 1, 2024, to November 5, 2024, and were sent a PVC during the time frame we reviewed.³²

²⁸ *Minnesota Statutes* 2025, 201.121, subd. 2. In actuality, creating or updating a voter registration record in SVRS automatically results in the system queuing this notice. Notices are sent from a central distributor and returned to counties if undeliverable.

²⁹ *Minnesota Statutes* 2025, 201.121, subd. 2.

³⁰ *Minnesota Statutes* 2025, 201.12, subd. 4.

³¹ *Minnesota Statutes* 2025, 201.071, subd. 1. While this requirement took effect for the Minnesota application in 2023, the federal voter registration form, which Minnesota also accepts, has always included space for the applicant to draw a map of the location at which they live.

³² We excluded from this analysis about 20,200 of 211,000 new applications that were not yet activated in SVRS. This group includes pre-registered 16- and 17-year-olds who did not turn 18 during the time frame. It also includes applications that were not yet entered into SVRS (mostly due to the timing of DVS processing before the applicant's information was transmitted to OSS).



Roles in Residency Verification for New Voter Registrations

OSS

- Provides guidance to counties
- Provides postal verification card (PVC) template
- Maintains SVRS, including processes to automatically send PVCs when a county creates a voter registration record

Counties

- Process returned PVCs
- Challenge voter registration records for individuals whose PVCs are returned

County election staff do not need to take action to verify the residency of most new applicants because the process is automated. In most cases, SVRS automatically queues PVCs to be sent to new applicants. If the PVC is not returned to the county, county election staff do not need to take any action, and the record remains active. If a PVC is returned to the county as undeliverable, however, county election staff should generally change the voter status to Challenged with a status reason of “Postal Return.” They may also use SVRS’s “returned PVC module” to record the PVC return date and reason for the return.

Counties followed the residency verification process correctly for 99 percent of applicants, most of whom were verified entirely automatically. Among the applicants counties manually reviewed, counties either inaccurately assigned voter statuses or failed to document their rationale in more than one-third of the cases we reviewed.

In 99 percent of the cases we reviewed, counties processed the voter application correctly, resulting in an accurate status for the voter registration record. As mentioned previously, most applicants had their residency verified automatically. We focused our analysis on the remaining cases in which the county manually updated the voter registration record or should have updated the record and failed to do so. As shown in Exhibit 2.8, among about 6,000 applications for which county election staff took action or should have taken action, more than one-third were either labeled inaccurately or lacked the documentation required for us to confirm the accuracy of the record.

**Exhibit 2.8
Residency Verification Processing Determinations**

Number of Records (Rounded to the Nearest 100)	Residency Verification Method	OLA Determination
185,000	Automatically verified	✓ Accurate
~3,600	County action required/Manually verified	✓ Accurate
		99% Accurate
~2,400	County action required/Manually verified	X Not Documented
		1% Not Documented

Notes: This table summarizes the status decisions counties made when processing about 191,000 unique applicants who were sent at least one PVC before the end of June 2025. An OLA determination of “Not Documented” indicates that SVRS did not show sufficient justification for the final voter status.

Source: Office of the Legislative Auditor, analysis of SVRS data, new voter registration applications submitted to counties from July 1, 2024, to November 5, 2024.

We do not know for certain whether the cases for which we could not confirm accuracy represent inaccurate determinations or poor recordkeeping. For example, the county may have received a returned PVC and appropriately challenged a record, without recording in SVRS the date and reason the PVC was returned. We provide examples of the situations we encountered below.

Voter statuses challenged without documentation. County election staff challenged some voter registration records without documenting that USPS had returned a PVC to the county as undeliverable. Since counties are not required to use the returned PVC module to document the date of a returned PVC, we do not know the extent to which these challenges were accurate.

Voter statuses inactivated without documentation. County election staff inactivated some records either without challenging them first or without waiting at least 60 days before doing so, as required by law.³³

Lack of Challenged voter status. County election staff did not challenge some voter registration records in response to a documented undeliverable PVC as required by state law.³⁴

No PVC sent. While PVCs are generally sent automatically once county election staff create a voter registration record with an Active voter status, we identified some records for which no PVC was sent.³⁵ OSS explained that many of these records were AVR applicants who did not receive a PVC due to a system error. They said, however, that these individuals would have received a nonforwardable AVR opt-out notice, the return of which also would have served to alert counties to an unverifiable address.

RECOMMENDATIONS

- **Counties should follow state law and OSS guidance when processing returned PVCs.**
 - **Counties should accurately document all returned PVCs in SVRS.**
-

County election staff should accurately challenge, inactivate, and reactivate voter registration records in accordance with state law and OSS guidance. It is important that the voter status in each SVRS voter registration record is accurate to help ensure a fair and secure election system. An incorrect voter status can impede someone from exercising their legal right to vote or allow someone to vote unchallenged, when they should be required to present additional information. County election staff should also

³³ *Minnesota Statutes* 2025, 201.12, subds. 2 and 4.

³⁴ *Minnesota Statutes* 2025, 201.12, subd. 2.

³⁵ For voter registration records entered with a Pending voter status (such as preregistered 16- and 17-year-olds), the PVC is not sent until the voter status is changed to Active. The instances described in this paragraph are not included in Exhibit 2.8, which includes analysis only of PVCs that were sent.

document in SVRS each PVC that is returned as undeliverable, including the return date and reason. This will improve the accuracy of information in SVRS. OSS may wish to update PVC-related guidance to more strongly encourage counties to use the PVC-return module within SVRS.

To help counties identify residency verification issues in their voter registration records, OSS could produce a residency verification report in SVRS. This would help county election staff identify voter registration records that need correction, including records that they challenged without adding a PVC return date, or records for which there is a PVC return date but no corresponding challenge. The report could also identify new or updated records for which no PVC was sent.

Residency Verification Outcomes

In addition to determining whether county election staff took appropriate action to verify voter applicants' residencies, we determined the percentage of applicants whose residency was verified before June 30, 2025, or before submitting a second application, whichever came first. We analyzed 185,000 applications submitted from July 1, 2024, to November 5, 2024, and for which a PVC was sent to the applicant during the period we reviewed.³⁶

Counties were able to verify residency for 99 percent of applicants who registered through the three most common voter registration methods: online, AVR, and election day registration.

Exhibit 2.9 shows the residency verification rate for each application method. By law, individuals who register prior to election day, fail residency verification, and subsequently clear the challenge on their record may vote.³⁷

Election-day registrants must present proof of residency during the election-day registration process.³⁸ After the election, county election staff enter election-day applications into SVRS, which automatically triggers the sending of PVCs. Statutes require that counties challenge any individuals who registered on election day and for whom the PVC is returned as undeliverable. These individuals must clear the challenge before voting in a subsequent election.³⁹

³⁶ The previous section noted that 191,000 new applicants were sent at least one PVC before July 1, 2025. By contrast, this section focuses on 185,000 of those applicants for whom the county sent at least one PVC before the individual submitted a second voter registration application.

³⁷ *Minnesota Statutes* 2025, 201.121, subd. 2; and 204C.12, subd. 3.

³⁸ *Minnesota Statutes* 2025, 201.061, subd. 3.

³⁹ *Minnesota Statutes* 2025, 201.121, subd. 2; and 204C.12, subd. 3. Further, *Minnesota Statutes* 2025, 201.121, subd. 3(a), requires that county election staff who do not “receive or obtain satisfactory proof of an individual’s eligibility to vote must immediately notify the county attorney of all of the relevant information.”

Exhibit 2.9 Residency Verification Rates of New Applications

Voter Registration Method	Total Number of Applications (Rounded to the Nearest 100)	Residency Verified
Online	51,400	99%
Automatic (AVR)	33,600	99
Paper	8,200	97
Regular (in-person delivery)	4,000	99
Mail-in	2,600	97
Registration drive	1,400	92
Federal post card application^a	500	94
Election day: In person	75,400	99
Minnesota driver's license	52,800	99
Driver's license plus utility or bank bill	11,800	98
Voucher	4,500	97
Student ID plus housing list	3,200	98
Passport plus utility or bank bill	1,300	98
Other documentation type	1,200	97
No documentation recorded	600	99
Election day: Absentee	15,900	99

Notes: The table reflects the residency verification outcomes for about 185,000 applications submitted from July 1, 2024, to November 5, 2024. The nonbold rows represent subcategories of different application methods: the source for paper applications and the documentation provided for election-day registration.

^a The federal post card application (which can be submitted on paper or online is used by members of the military, their family members, and other U.S. citizens residing outside of the United States to register to vote, request an absentee ballot, and update contact information.

Source: Office of the Legislative Auditor, analysis of SVRS data, new voter registration applications submitted to counties from July 1, 2024, to November 5, 2024.

Reporting on Residency Verification

Statutes require that counties send notices (which take the form of PVCs) to all individuals who registered or updated their voter registration record on election day.⁴⁰ Counties must annually report certain information concerning these election-day PVCs to OSS; OSS must then report that information to the Legislature by March 1 of every year. The required reporting includes:

- The total number of all notices that were returned as undeliverable.
- The total number of undeliverable notices for which the county was able to determine the reason for the return, along with those reasons.
- The “total number of individuals for whom the county auditor does not receive or obtain satisfactory proof of an individual’s eligibility to vote.”⁴¹

⁴⁰ *Minnesota Statutes* 2025, 201.121, subd. 3(a).

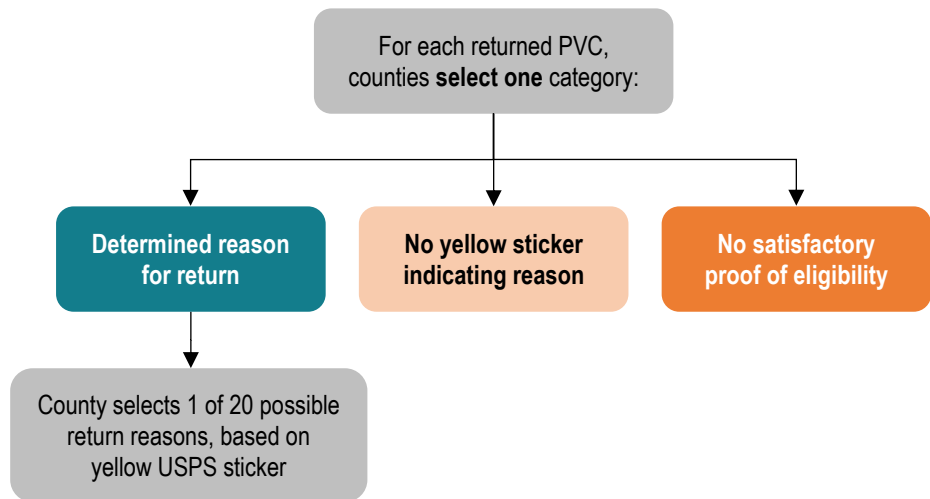
⁴¹ *Minnesota Statutes* 2025, 201.121, subd. 3(a) and (b).

In response to this requirement, OSS produces an annual report on election-day registrants showing the number of each county’s returned PVCs in one of three mutually exclusive categories, shown in Exhibit 2.10.⁴² If county election staff determined a reason for the postal return (based on the yellow sticker that USPS placed on the returned mail), the report also shows the reason.

OSS’s 2025 report to the Legislature indicated that only 12 counties reported that they could not obtain satisfactory proof of eligibility for one or more election-day registrants after the 2024 general election.⁴³ The data in the report showed that county election staff determined the reason for 99 percent of returned PVCs and marked less than 1 percent of returned PVCs as “no satisfactory proof of eligibility.”

Counties determined the reason for return for **99%** of undeliverable PVCs.

Exhibit 2.10
Categorization Options for Returned PVCs for Election-Day Registrants



Note: Possible return reasons listed on the yellow USPS sticker include “forwarding address in county,” “forwarding address out of state,” “insufficient address,” and many others.

Source: Office of the Legislative Auditor, and Office of the Secretary of State, *Postal Verification Card Report*.

⁴² See, for example, Office of the Secretary of State, *Postal Verification Card Report for elections held between January 1, 2024 – December 31, 2024 (2025)*.

⁴³ Office of the Secretary of State, *Postal Verification Card Report*.

While OSS's report on PVCs returned after an election may meet statutory requirements, the report offers limited value.

Eligibility reporting could be misinterpreted. OSS's report on PVCs sent to election-day registrants includes the three elements required by statute. However, the phrasing "no satisfactory proof of eligibility to vote" may give the impression that the report addresses eligibility issues more broadly than it actually does. Some readers may interpret the category to mean that county election staff determined eligibility or lack thereof, based on all eligibility criteria, for all voters reflected in the report. In fact, the report focuses on *residency-related* issues stemming from the returned PVCs and shows only whether county election staff know the reason for the postal return. The report does not explicitly address any eligibility issues related to identity or other factors.



...the [election-day registration] PVC [process] doesn't report much on eligibility for all the work that goes into sorting, reviewing, and documenting them.

— County survey respondent

Further complicating questions of eligibility is the fact that a returned PVC does not mean that the individual was ineligible to vote. We surveyed county election staff and several respondents commented that USPS often returns PVCs for addresses county election staff know are valid.⁴⁴ PVCs may also be returned as the result of an error in the address or the individual moving shortly after election day, among other reasons.

The report is also difficult to interpret because some returned PVCs could fit into more than one of the mutually exclusive categories. As Exhibit 2.10 demonstrates, county election staff are not permitted to categorize the same returned PVC as both "no satisfactory proof of eligibility" and "determined reason for return." However, it is unclear which category county election staff should use if both categories apply to the same returned PVC. For example, if the yellow USPS sticker indicates that there is "no such street," county election staff could count the PVC in the "determined reason for return" category. But if the nonexistent address causes county election staff to doubt the individual's eligibility to vote in the precinct, "no satisfactory proof of eligibility" may also be appropriate.

General lack of context. OSS's current PVC reporting lacks context necessary to understand the information presented. The law does not require—and the report does not include—total numbers of election-day registrants or total numbers of PVCs sent to those registrants, which makes it difficult to interpret the magnitude of each county's reported numbers.⁴⁵ For example, in 2024, one county reported receiving 88 returned PVCs from election-day registrants after the 2024 general election. The report shows that county election staff determined a reason for all of the returns and that the most common reason was "no mail receptacle." The report does not show that the county

⁴⁴ During the fall of 2025, we surveyed election staff in all Minnesota counties and received responses from 82 of 87 counties (94 percent).

⁴⁵ While not part of post-election PVC reporting, OSS makes the number of election-day registrants for each county publicly available through its website. See, for example, <https://www.sos.mn.gov/media/yt3llxwd/2024-general-federal-state-results-by-precinct-official.xlsx>, accessed June 23, 2026.

had nearly 1,200 election-day registrants or that approximately 7 percent of PVCs sent to election-day registrants were returned as undeliverable.

Further, the report to the Legislature provides no indication of whether county election staff were able to resolve the returned PVCs by, for example, correcting an error or using a forwarding address to verify the voter's residency. OSS guidance encourages county election staff to research each undeliverable PVC by reviewing property records, confirming that the address is a residential property, or looking for errors in the address, among other things. To complete OSS's reporting template, however, counties must only report on the reason (such as "forwarding address in county") for the postal return, as stated on the yellow sticker that USPS places on undeliverable mail.

RECOMMENDATION

The Legislature should clarify the purpose and requirements of post-election reporting on returned PVCs.

OSS's current method of post-election reporting on returned PVCs may meet statutory requirements, but it does not present information in a useful way. The current report does not indicate the scope or the significance of PVCs returned post-election. This could leave the report open to misinterpretation at best and misuse at worst. The Legislature should determine what reporting would be most useful for legislators and clarify the statutes accordingly.

If the intent of the report is to examine voter eligibility broadly, the results of the current PVC process shows only one small piece of the puzzle. OSS may be able to provide different information to address the Legislature's questions regarding voter eligibility.

Chapter 3: Maintaining Accurate Lists of Registered Voters

Life circumstances change, and those changes sometimes impact an individual’s eligibility to vote. The voter verification processes described in Chapter 2 help ensure that applicants meet requirements at the time they were registered. However, voters become ineligible to vote in Minnesota for a variety of reasons, including, for example, if they become incarcerated or move outside of Minnesota. The Office of the Secretary of State (OSS) and counties are responsible for ensuring that voter registration records are accurate and updated when needed.

In this chapter, we start by defining “voter registration list maintenance.” We go on to explain how regular data submissions from other state agencies help counties identify voter registration records that may need updating and the extent to which counties have done so appropriately. We discuss how the Statewide Voter Registration System (SVRS) supports county efforts to maintain accurate lists of registered voters, as well as the guidance that OSS provides to help them do so. Finally, we discuss the circumstances under which OSS inactivates lapsed voters.

Key Findings in This Chapter

- While the Office of the Secretary of State (OSS) satisfied its requirements to provide counties with data from other state agencies, county election staff did not always update voter registration records as required by law.
- Counties sent required notices within 10 days to 84 percent of registered voters whose incarceration or guardianship challenges they removed.
- Federal law, Minnesota law, and OSS practice establish different criteria for inactivating voter registration records.



Roles in Voter Registration List Maintenance

OSS

- Receives data from other agencies and provides information to county election staff
- Maintains SVRS and develops reports to help county election staff identify issues with voter registration records
- Provides guidance to county election staff
- Performs annual list maintenance to inactivate the voter registration records of individuals who have not voted for a prescribed amount of time

Counties

- Update voter registration records in response to SVRS queues and reports
- Report to county attorney and OSS suspected violations of voter registration law

List Maintenance Overview

“**Voter registration list maintenance**” refers to the process of maintaining accurate and up-to-date lists of registered voters. It includes adding and removing voters from voter registration lists, as needed, and updating voter information as appropriate.

In Minnesota, OSS receives information about voters from a variety of sources (such as other state agencies) and provides it to counties. County election staff, in turn, update voter registration records. Some updates, such as a name change or a change of address within the same precinct, do not impact the voter’s eligibility. Other changes to life circumstances may result in the individual becoming ineligible to vote.

As described in Chapter 1, each voter registration record in SVRS has a voter status label that provides information about the current status of the individual's voter registration record. The box to the right provides a reminder of these voter statuses. Only "registered voters," those with voter statuses of **Active** or **Challenged**, appear on the voter roster that a county prepares for election day. Voters with a Challenged voter status have a challenge notation on the roster, which the voter can generally resolve by answering certain questions and swearing to their eligibility. Inactive voters do not appear on election-day rosters; if an Inactive voter wishes to vote, they must reregister.

Counties may challenge voter registration records for many reasons, the most common of which is the return of a postal verification card (PVC). Among registered voters with a Challenged voter status as of September 2025, more than three-quarters were challenged due to a postal return. Fewer than 9 percent were challenged for the disqualifying conditions discussed in the next section, such as incarceration for a felony (8 percent), guardianship (0.4 percent), or lack of citizenship (0.2 percent).¹



Voter Statuses in SVRS

Registered Statuses

Active: Individual is fully registered and eligible to vote.

Challenged: Individual is registered, but must provide documentation or answer certain questions before they may vote.

Nonregistered Statuses

Deceased: Individual has died.

Deleted: County election staff deleted a voter registration record after identifying duplicate records and merging their contents, or in other limited circumstances.

Inactive: Individual's voter status is no longer Active, for example because they moved out of state or have not voted for a prescribed amount of time.

Pending: Individual is either preregistered as a 16- or 17-year-old, or the registration is within the 20-day opt-out period for automatic voter registration.

Information from Other Agencies

Statutes require multiple state agencies to provide OSS with information regarding the eligibility of certain voters, as shown in Exhibit 3.1.² Statutes direct OSS to use the data from other state agencies to identify registered voters whose eligibility to vote has changed (for example, as a result of being incarcerated or released from incarceration), as well as those who are not U.S. citizens or are deceased. OSS then must provide the relevant data to county election staff, who must update voter registration records accordingly.³

Minnesota statutes establish similar requirements for the information that each of four state agencies must share with OSS. All four agencies—the Department of Corrections (DOC), the Department of Public Safety's Driver and Vehicle Services Division (DVS),

¹ The remaining challenges generally related to identities that could not be verified or other name/address-related discrepancies.

² *Minnesota Statutes 2025*, 201.13, subd. 1; and 201.145, subds. 1–5.

³ Statutes also require or allow OSS to use U.S. Postal Service data and data from the Electronic Registration Information Center (ERIC) to identify voters who have moved to a new address. *Minnesota Statutes 2025*, 201.13, subd. 3. We focused our analysis in this chapter on eligibility changes, rather than changes of name or address.

the Minnesota Department of Health (MDH), and the State Court Administrator’s Office (SCAO)—must provide individuals’ names, dates of birth, and addresses (or last known address in the case of incarcerated individuals).⁴ While the other information that agencies must provide varies, most of the agencies must also provide individuals’ driver’s license number and/or the last four digits of their Social Security number, if such identifying numbers are available.

Exhibit 3.1

State Data Sources Used to Maintain Accurate Lists of Registered Voters

Agency	Data	Statutory Timelines
Department of Corrections	Data on individuals who are incarcerated for a felony conviction	<ul style="list-style-type: none"> • DOC must report at least monthly. • OSS must provide data to counties within seven days. • Counties must mark individuals as Challenged in SVRS within seven days.
Department of Public Safety’s Driver and Vehicle Services Division	Data on individuals with temporary lawful status in the U.S.	<ul style="list-style-type: none"> • DVS must report at least monthly. • OSS must provide data to counties within seven days. • Counties must mark individuals as Challenged in SVRS within seven days.
Minnesota Department of Health	Data on deceased individuals	<ul style="list-style-type: none"> • MDH must report monthly. • OSS must provide data to counties (statutes do not establish a timeline). • Counties must mark individuals Deceased in SVRS within 60 days.
State Court Administrator’s Office	Data on individuals under a guardianship in which a court order revokes or restores their right to vote	<ul style="list-style-type: none"> • SCAO must provide data daily. • OSS must provide data to counties within seven days. • Counties must mark individuals as Challenged in SVRS within seven days.

Source: *Minnesota Statutes* 2025, 201.13, subd. 1; and 201.145, subds. 1–5.

While OSS satisfied its requirements to provide counties with data from other state agencies, counties did not always update voter registration records as required by law.

When OSS receives data from another agency, it uses automated matching processes within SVRS to determine whether any individual appearing in the data matches with one or more registered voters in SVRS.⁵ It provides those voter registration records to counties through a report containing all matches, a county-specific queue within SVRS, or a county-specific email, depending on the data source. Counties evaluate the matches that OSS provides and update voter registration records, when appropriate.

⁴ *Minnesota Statutes* 2025, 201.13, subd. 1; and 201.145, subds. 2(c), 3(b), and 5(b).

⁵ The data OSS receives from other state agencies do not contain Voter ID numbers; the office instead uses different combinations of identifying variables to identify likely matches. For example, a voter registration record on DOC’s list of incarcerated individuals would be considered a match to an SVRS record if it had the same last name and date of birth, as well as a similar first name. OSS has established multiple different sets of match criteria for each data source.

As demonstrated in Exhibit 3.1, **OSS** must provide counties with information about ineligible individuals within seven days of receipt from DOC, DVS, or SCAO.⁶ Statutes do not specify a timeline for OSS to provide counties with MDH’s data on deceased individuals.⁷ To the extent we could determine using OSS documentation and data from the month of September 2024, OSS provided relevant data to counties within seven days for each of the four data sources, including from MDH.⁸

Using the data that OSS received from other agencies during the fall of 2024, we examined whether **counties** updated affected records (1) correctly and (2) within the required time frame.⁹ As demonstrated in Exhibit 3.1, counties must update voter registration records within 7 days of receipt for data from DOC, DVS, and SCAO, and within 60 days for MDH data on deceased individuals.¹⁰

DOC data on incarcerated individuals. Every month, OSS uses the data it receives from DOC to produce a report for counties, including two lists of registered voters: (1) newly incarcerated individuals who are not yet Challenged and (2) individuals who were removed from the list (are no longer incarcerated) but still have a Challenged voter status in SVRS.¹¹

OSS’s September 2024 *Monthly DOC Record Matches* report included 59 registered voters who were newly incarcerated. As shown in Exhibit 3.2, county election staff failed to apply a voter status of Challenged with a status reason of “Incarcerated” to about one-quarter (16) of these registered voters. Further, counties marked as Challenged the records of 11 other individuals after the statutory deadline of seven days. Counties’ late challenges were made at a median of nine days; however, all challenges were recorded before election day. Among the 59 newly incarcerated individuals, 1 was released in time to vote in the November 2024 general election and another allegedly voted in person on election day while still incarcerated.¹²

Among the 39 individuals who were no longer incarcerated as of September 2024, counties removed the challenges from all but two records. However, nearly one-half of the challenges were removed after the statutory deadline of seven days. Counties’ late removals occurred at a median of nine days, and all but one took place before election day.¹³

⁶ *Minnesota Statutes* 2025, 201.145, subds. 2(d), 3(c), and 5(c).

⁷ *Minnesota Statutes* 2025, 201.13, subd. 1.

⁸ We did not evaluate OSS’s September 2024 *DPS Non-Citizen Data to Voter Registration Record Matches* report because DVS made process changes during that month that affected the composition of the report. We instead evaluated the October 2024 match report.

⁹ We used OSS’s match criteria to conduct our own matches for voter registration records in the datasets that OSS received in September 2024. We evaluated county compliance for voter registration records that resulted in an exact match or a single partial match.

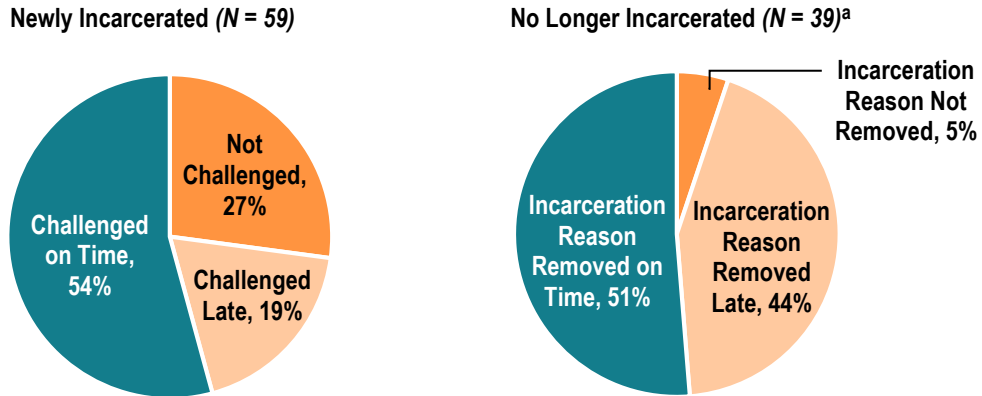
¹⁰ *Minnesota Statutes* 2025, 201.13, subd. 1; and 201.145, subds. 2(d), 3(c), 4(d), and 5(c).

¹¹ The *Monthly DOC Record Matches* report also includes a third category, individuals who voted while incarcerated. We discuss ineligible voters later in this chapter.

¹² County election staff became aware of this individual in November 2025 and reported them to the county attorney in March 2026.

¹³ The one individual whose challenge was removed after election day voted in the 2024 general election after clearing their challenge; the county updated the voter status to Active two weeks after election day.

Exhibit 3.2
County Response to OSS Report on Incarcerated and Formerly Incarcerated
Individuals, September 2024



Note: Among the voter registration records for which counties were late to challenge or remove a challenge, all but one record was marked with the appropriate voter status and/or status reason by the 2024 general election.

^a For many individuals who are no longer incarcerated, counties activated their voter registration record at the same time they removed the status reason of Incarcerated. If an individual had other challenges on their voter registration record, however, they remained Challenged even after the status reason of Incarcerated was removed.

Source: Office of the Legislative Auditor, analysis of *Monthly DOC Record Matches* report and SVRS data, September 2024.

DVS data on noncitizens with temporary lawful status. When OSS receives DVS data on individuals with temporary lawful status, the office produces a report consisting of individuals appearing on the DVS list who match with an Active or Challenged voter. Once a record is matched, it is not included on subsequent reports. OSS then sends matching records directly to the relevant county. Since October 2024, the DVS match report has consistently included fewer than 25 individuals statewide each month; the October 2024 report included only one individual who actively had a temporary lawful status. The county challenged the voter registration record (with a status reason of “Citizenship”) within the required seven days after OSS produced the DVS match report.

MDH data on deceased individuals. In its September 2024 data provided to OSS, MDH listed 3,748 deceased Minnesotans age 16 or older. We matched 2,642 of the deceased individuals to voter registration records in SVRS using match criteria defined by OSS.¹⁴ Counties changed the voter status to Deceased for all but 17 of the voter registration records we matched; all of the status changes counties made occurred by the statutory deadline of 60 days from when counties received the list from OSS.¹⁵

Counties correctly marked

99.4%

of relevant voter registration records as Deceased

¹⁴ The remaining 1,100-plus unmatched records included individuals from MDH’s data who were not registered to vote, as well as individuals with common enough names that they resulted in multiple SVRS matches.

¹⁵ *Minnesota Statutes* 2025, 201.13, subd. 1.

Eight of the individuals who county election staff did not mark as Deceased had Inactive voter statuses at the time of their death; they remained Inactive. The other nine individuals may or may not represent errors on the part of the county. Matches for all but one of the nine individuals on the MDH report were partial (rather than exact) matches with voter registration records in SVRS. Counties may have evaluated the voter registration records and decided that they could not definitively determine that the matching record was associated with the same deceased individual. None of these nine individuals voted in the 2024 general election.

Court data on individuals under guardianship. In September 2024, SCAO provided reports of 62 individuals whose voting rights were revoked and 2 whose rights were restored. Among the individuals whose rights were revoked, OSS matched 17 to existing voter registration records. Counties challenged each of the 17 voter registration records with a status reason of “Guardianship.”¹⁶

Counties did not, however, challenge all of these voter registration records in a timely fashion; 4 of the 17 individuals whose rights were revoked were likely challenged after the seven-day statutory timeline. The late challenges were recorded a median of 79 days after the court ordered the removal of rights. One of the four individuals who counties challenged late voted in the 2024 general election; the county challenged the individual’s voter registration record more than two weeks after the election.

Limitations of Match Reports

OSS uses two different methods—queues and match reports—to alert counties to voter registration records that may need updating. Every time a county election staff person logs into SVRS, they see a list of pending work, including an indication of which queues contain voter registration records for that county to address. Voter registration records remain in queues until the county has taken action to update or dismiss the record. Data from MDH (deceased individuals) and SCAO (individuals under guardianship) appear in county queues as OSS receives the data and matches it to voter registration records. In contrast, OSS creates monthly match reports for both DOC incarceration data and DVS temporary lawful status data. OSS emails counties to alert them the DOC match report is available for review in SVRS. For the DVS match report, OSS reviews the SVRS report and sends a county’s matching records directly to the county. County election staff must review the report and keep track of whether they have addressed the voter registration records that appear within.

OSS includes only newly matched individuals in its reports based on DOC and DVS data, which could result in counties overlooking voter registration records that need updating.

The DOC and DVS match reports that OSS prepares for counties every month contain only registered voters who are *newly* incarcerated or who *newly* match with temporary lawful status data, respectively. OSS explained that it has always constructed the DVS report in this manner. They said, however, that the DOC report used to include all

¹⁶ The individuals whose rights were restored did not match with existing voter registration records at the time their rights were restored; one of them registered for the first time shortly thereafter.

incarcerated individuals who were not challenged, but they changed it because county election staff and county attorneys did not want to have to wade through or reinvestigate cases they had already determined should not be challenged.

As noted previously, however, counties failed to challenge more than one-quarter (16) of the individuals who appeared on the September 2024 *Monthly DOC Record Matches* report as incarcerated for a felony. None of these individuals, however, appeared on OSS's October 2024 report for counties, despite the fact that DOC's data indicated that all but one were still incarcerated during that month. Had these individuals appeared on subsequent DOC match reports, counties would have been reminded of them and may have challenged them later. As it was, counties did not challenge any of the 16 individuals in question with a reason of Incarcerated (through at least June 2025, which was the endpoint of the data we analyzed).

In April 2026, an individual was charged with voting in the 2024 general election while ineligible to do so (because they were not a U.S. citizen).¹⁷ The individual in question registered to vote in March of 2023 and appeared on OSS's April 2023 *DPS Non-Citizen Data to Voter Record Matches* report. The county did not immediately challenge the individual and did not receive reminders to do so because the individual did not appear on subsequent DVS match reports.

RECOMMENDATIONS

- **OSS should modify its monthly match reports on disqualifying conditions to include all matching voter registration records that counties have not yet updated.**
- **Counties should either update—or document their rationale for not updating—all voter registration records flagged by OSS for a disqualifying condition.**

Minnesota statutes require that counties challenge the voter registration records of each individual who OSS flags as (1) incarcerated and not challenged or (2) registered to vote while having temporary lawful status.¹⁸ The current system, however, does not provide safeguards in the event that a county overlooks an individual who needs a voter-status change when reviewing monthly match reports. At present, OSS's reports list each individual only one time, in the month during which OSS identified the individual's voter registration record as a match with DOC or DVS data.¹⁹

OSS could potentially lower the risk of counties missing voter registration records that should be challenged by reporting ineligible individuals every month until the counties challenge their records as required by law. Similarly, the DOC match report should also list individuals *who have been released* but are still challenged until counties remove the Challenged voter status.

¹⁷ Complaint, April 13, 2026, *State v. Chaudhari*, 23-CR-26-192 (Minn. Dist. Ct.), 1.

¹⁸ *Minnesota Statutes* 2025, 201.145, subds. 3(c) and 5(c).

¹⁹ OSS staff explained that an individual would appear on a subsequent DOC match report if relevant information, such as incarceration dates, changed.

Alternatively, OSS could convey information on incarcerated and released individuals and noncitizens through SVRS queues rather than monthly reports. This would result in flagged voter registration records remaining in a county's queue until the county updated or dismissed the record.

Counties may investigate an individual from an OSS report and determine that the voter registration record does not require updating. OSS staff explained that in rare cases, there is an issue with matching voter registration records between SVRS and DOC data. An eligible voter and a different individual who is incarcerated may share key demographic information, resulting in the eligible voter erroneously matching with DOC data. It would benefit counties to be able to use SVRS to track voter registration records that they have already investigated and decided not to update. OSS should add functionality that lets counties flag voter registration records that they have already investigated; OSS could then omit them from future match reports or list them in a separate section.

Challenge-Removal Notices

Many individuals have had their civil rights restored; from July 1, 2024, to June 30, 2025, counties removed Challenged voter statuses for approximately 4,200 individuals who were no longer incarcerated and nearly 70 individuals who had been removed from under guardianship. Minnesota rules require that counties mail a notice containing an individual's "name, address, precinct, and polling place" to a registered voter upon the removal of a Challenged voter status for felony incarceration or guardianship.²⁰

Counties sent required notices within 10 days to 84 percent of registered voters whose incarceration or guardianship challenges they removed.

During the time period we evaluated, OSS did not have a template for a challenge-removal notice or guidance on how to fulfill the notice requirement. However, the required elements of a challenge-removal notice are the same as the elements of the PVC required by statute.²¹ As such, a PVC would satisfy the requirements of the rule. The data indicate that counties sent appropriately timed PVCs to 84 percent of the nearly 4,300 individuals whose rights were restored from July 1, 2024, to June 30, 2025.²²

OSS updated the office's rules, effective June 1, 2026, requiring counties to send a notice of challenge removal to individuals who are no longer incarcerated.²³ In June of 2026, OSS distributed guidance reminding counties of this requirement and clarifying that a PVC would satisfy the requirement.

²⁰ *Minnesota Rules 2025, 8200.3550*, as amended; see *50 State Register*, p. 971 (2026).

²¹ *Minnesota Statutes 2025, 201.121*, subd. 2.

²² Counties send PVCs for a variety of reasons, and SVRS does not indicate those reasons. State law does not establish a time frame for sending challenge-removal notices. For the purpose of this analysis, we considered the notice requirement fulfilled if the county sent a PVC within 10 days of challenge removal.

²³ *Minnesota Rules 2025, 8200.3550*, as amended; see *50 State Register*, p. 971 (2026). The rule update did not change the requirement for counties to send notices to individuals who have been removed from under guardianship that impacted their right to vote.

RECOMMENDATION

Counties should send a notice to all individuals whose rights to vote have been restored, as required by Minnesota rules.

Counties should follow Minnesota rules and OSS guidance by sending notices to all individuals whose challenges for guardianship or incarceration have been removed, rendering them eligible to vote. As stated in recent OSS guidance, PVCs fulfill this requirement; counties should queue a PVC for each relevant individual who has a Challenged voter status removed from their voter registration record.

SVRS Functionality

Having an electronic voter registration system that operates well is critical to maintaining voter registration records. OSS maintains SVRS for this purpose, as required by federal and state laws.²⁴ The database offers numerous ways for counties to review the information about the state's nearly 3.8 million registered voters, as well as former voters whose voter records have been inactivated or are deceased.

SVRS Reporting Functions

OSS has programmed SVRS to produce more than 270 reports, many of which are relevant to voter registration. These include reports that OSS directs counties to access at specific times, such as monthly or immediately after an election. SVRS also produces reports that counties can use anytime to help ensure that their lists of registered voters are accurate.

Identifying Ineligible Voters

As part of a post-election review of voter registration records, OSS recommends that counties run and review two reports to help identify individuals who may have voted while ineligible: *Voter Records with Duplicate History* and *Voters Updated Due to Voting*.²⁵

Voter Records with Duplicate History. This SVRS report lists individuals who appear to have voted twice in the same election. When reviewing this report, OSS's post-election guidance instructs counties to confirm each listed individual's voting history using election-day rosters. If the county election staff added voting history to a voter registration record in error, they must correct it in SVRS. If counties believe the individual voted twice or more, OSS guidance directs them to refer the individual to their county attorney.²⁶

²⁴ 52 U.S. Code, sec. 21083(a)(1)(A) (2024); and *Minnesota Statutes 2025*, 201.022, subd. 1.

²⁵ Office of the Secretary of State, Elections Division, *Post-Election SVRS Data Entry & Voter Record Review, November 5, 2024 State General Election* (2024), 5–6. The guidance also recommends running *Potential Duplicate Voter Records* reports at this time; we discuss these in a subsequent section.

²⁶ Under *Minnesota Statutes 2025*, 204C.14, subd. 1(b), voting more than once in the same election is a felony.

The *Voter Records with Duplicate History* report for the November 2024 general election identified about 350 individuals with duplicate voting histories, spread across more than one-half of Minnesota’s counties. OSS staff said that a duplicate voting history “most often” results from data entry errors by county election staff.²⁷

Voters Updated Due to Voting. This SVRS report identifies individuals who cleared challenges and voted.²⁸ OSS guidance instructs counties to review the report for individuals with a previous voter status of Challenged due to incarceration, guardianship, or citizenship.²⁹ The guidance instructs counties to double check data entry for those cases and investigate the circumstances as needed.

An individual can legitimately clear a challenge if, for example, they are no longer incarcerated or under guardianship, or if they have become a naturalized citizen. However, if county election staff have reason to believe that an individual voted while still ineligible, they must forward the case to their county attorney for further investigation.³⁰

The *Voters Updated Due to Voting* report for the November 2024 election listed nearly 30,000 individuals who cleared a challenge and voted, though a relatively small number of individuals cleared a challenge for a disqualifying condition. Of the 30,000 individuals listed, 27 cleared challenges for felony incarceration, 25 for guardianship, and 59 for citizenship. The others cleared other types of challenges, such as those related to postal returns.

By law, county election staff must report voting while ineligible and all other alleged violations of voter registration law to their county attorney and “immediately send a copy” of the referral report to OSS.³¹

County election staff do not generally inform OSS when they refer suspected violations of voter registration law to county attorneys, as required by law.

OSS staff explained that there has not been an expectation that counties send all county attorney referrals to OSS. They explained that, though infrequent, OSS sometimes receives informal reports from county election staff at the time or shortly after they

²⁷ OSS staff said that there is not a way to use SVRS to determine the number of voter registration records with duplicate voting history that resulted from data entry errors, and the determination of whether a duplicate is a result of data entry errors requires investigation with respect to the individual record.

²⁸ It also identifies individuals with inactivated records who reregistered and had a challenge on their previous record. OSS added this functionality in response to an Office of the Legislative Auditor recommendation. Office of the Legislative Auditor, Program Evaluation Division, *Voter Registration* (2018), 56.

²⁹ Office of the Secretary of State, Elections Division, *Post-Election SVRS* (2024), 6–7.

³⁰ *Minnesota Statutes* 2025, 201.145, subds. 3(d) and 5(d); and 201.27, subd. 2.

³¹ *Minnesota Statutes* 2025, 201.27, subd. 2. Minnesota rules establish a separate reporting requirement for county attorneys themselves. By October 1 of each year, county attorneys “shall report the outcome of any charging decision based on an investigation of alleged violations of voter registration or voting laws from the previous calendar year” to OSS. *Minnesota Rules* 2025, 8200.7200, subp. 1.

have been reported to the county attorney. These reports typically concern questions about specific registered voters.

According to OSS staff, the vast majority of cases county election staff refer to county attorneys are the result of information OSS provides to counties: lists of (1) individuals who allegedly voted while incarcerated, and (2) registered voters who are not U.S. citizens.³² OSS staff asserted that counties do not need to send a copy of the resulting referrals to OSS.

While Minnesota statutes direct county election staff to refer *certain types* of cases to county attorneys (without explicitly requiring that counties send a copy to OSS), statutes also require counties to report to OSS *any violation* of the statutory chapter on eligibility and registration of voters.³³ Such violations include registering or voting while ineligible to do so, among other things.

RECOMMENDATIONS

- **OSS should establish guidance directing county election staff to immediately send the office copies of their voting-related referrals to the county attorney.**
- **Counties should send all voting-related referrals they send to county attorneys to OSS, as required by law.**

It would take little effort for county election staff to provide copies of county-attorney referrals to OSS. If county election staff already make referrals by email, they can simply include OSS as a recipient. Receiving these referrals when they occur would allow OSS to perform up-to-date analysis of the number of referrals and their topics. Such analysis could help OSS identify systemic issues that need to be addressed through education or legislation.

In its guidance, OSS should clarify differences between (1) the statutory requirement that county election staff report all county attorney referrals to OSS, and (2) the requirement in rules that county attorneys report the outcomes of charging decisions to OSS.³⁴ In both cases, OSS should be explicit about what, when, and how counties should report.

Use of SVRS Reports

We surveyed county election staff and asked whether the respondents had used certain SVRS reports over the previous year.³⁵ We specifically asked about reports that county

³² *Minnesota Statutes 2025*, 201.145, subsds. 3(d) and 5(d).

³³ *Minnesota Statutes 2025*, 201.145, subsds. 3(d) and 5(d); and 201.27, subd. 2.

³⁴ *Minnesota Statutes 2025*, 201.27, subd. 2; and *Minnesota Rules 2025*, 8200.7200, subp. 1.

³⁵ During the fall of 2025, we surveyed election staff in all Minnesota counties and received responses from 82 of 87 counties (94 percent). Since we administered the survey during September and October 2025, “the previous year” included the run-up to the 2024 general election, as well as special or municipal elections occurring during the first half of 2025.

election staff could use proactively to identify anomalies in their voter registration records. For example, the *Addresses with Multiple Voters* report might show that an unexpectedly large number of individuals are registered at the same address. Using this information, county election staff may decide to investigate the address itself and whether all of the registrants at an address are legitimate residents and eligible voters. We also asked about the *Voters Updated Due to Voting* report (discussed previously), which lists individuals whose voter registration records were previously challenged, but who cleared a challenge or reregistered on election day. Finally, the *Voters with Invalid Birthdates* report identifies voter registration records with missing or improbable birthdates (records indicating that an individual is less than 18 years old or more than 110 years old). We separately asked county election staff about their use of SVRS’s several *Potential Duplicate Voter Records* reports.

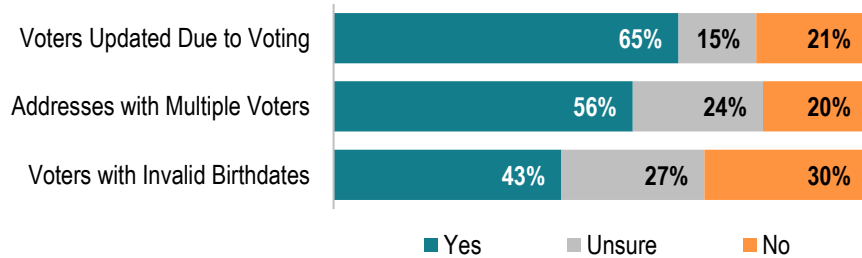
The fact that a voter registration record appears on one of the reports discussed in this section *does not* necessarily mean that the voter in question is ineligible to vote. On the *Addresses with Multiple Voters* report, for example, many of the results may reflect groups of eligible voters who live together for legitimate reasons (such as families that include more than one individual of voting age or residents of multi-bed care facilities). However, the reports give county election staff a starting place to investigate and either identify issues with or confirm the accuracy of voter registration records.

Some counties reported not using certain reports that could help them identify issues with voter registration records.

As shown in Exhibit 3.3, county survey respondents reported using the reports at varying rates. While about two-thirds reported using the *Voters Updated Due to Voting* report over the preceding year, fewer than one-half of the county survey respondents reported using the *Voters with Invalid Birthdates* report.

Exhibit 3.3

Survey Responses: Have your county's election staff used the following SVRS reports over the past year?



Notes: All 82 county survey respondents replied to all three questions. Totals may not sum to 100 percent due to rounding.

Source: Office of the Legislative Auditor, survey of county election staff, 2025.

Voters Updated Due to Voting Report

In 2018, the Office of the Legislative Auditor (OLA) reported that “over two dozen county election officials” indicated that they did not use the *Voters Updated Due to Voting* report for its intended purpose and recommended that counties “consider using” the report.³⁶

While it is difficult to make a direct comparison, the results of our 2025 survey of county election staff were similar: the respondents from 29 counties (35 percent) indicated that they had not used the report or were unsure whether they had used it over the past year. It would take additional work to determine whether those county election staff who have not used the report considered doing so. Staff from the remaining 53 counties (65 percent) reported that they had used the report.

UPDATE TO 2018 REPORT

In its 2018 *Voter Registration* report, OLA recommended that county election officials consider using the *Voters Updated Due to Voting* report to identify individuals who may have voted while ineligible.

WORK NEEDED TO DETERMINE IMPLEMENTATION

We do not know the extent to which counties that do not currently use the report have considered doing so.

In 2018, OLA also recommended developing SVRS reporting about inactive voters.³⁷ Many voters with an Inactive voter status are individuals who are eligible to vote but were inactivated because they had not voted recently. Those individuals may reregister on or before election day. Some voters, however, were challenged for a disqualifying condition, a postal return, or another reason, before they became inactive. In 2018, OLA posited that it would be useful for counties to have a report identifying inactive voters who registered on election day but who were possibly ineligible.³⁸ Soon after the release of

OLA’s 2018 evaluation report, OSS added SVRS reporting functionality to the *Voters Updated Due to Voting* report to identify formerly inactive voters who (1) had challenges on their voter registration records and (2) reregistered on election day. The report shows that there were 153 individuals who reregistered on the date of the 2024 general election who had a voter status of Challenged before their voter registration record was inactivated.

UPDATE TO 2018 REPORT

In its 2018 *Voter Registration* report, OLA recommended that OSS consult with counties about the need for a report to identify inactive voters who register while ineligible to do so.

RECOMMENDATION IMPLEMENTED

OSS created the recommended functionality in SVRS.

³⁶ OLA, *Voter Registration*, 55–56.

³⁷ OLA, *Voter Registration*, 56.

³⁸ OLA, *Voter Registration*, 56.

Potential Duplicate Voter Records Reports

Minnesota statutes state that “list maintenance must include procedures for eliminating duplicate names from the official list of eligible voters.”³⁹ Duplicate voter registration records are a concern because an individual who appears on a voter list multiple times could theoretically vote multiple times on election day. Duplicate voter registration records may appear in SVRS for a number of reasons, such as when an already registered individual reregisters upon moving to a new county. Similarly, an individual who is already registered might submit a new voter registration application when their name changes.

SVRS allows county election staff to run six different *Potential Duplicate Voter Records* reports, each based on a different set of criteria, listed in the box to the right. These reports help county election staff identify individuals with multiple voter registration records and remove the duplicates from their list of registered voters.

OSS recommends that counties run these reports and merge duplicate sets of voter registration records before printing the voter roster for an election, after an election, and on a monthly basis throughout the year. In 2024, county election staff addressed more than 8,600 sets of duplicate voter registration records by merging the information from the duplicate records and deleting the extra records from each set.⁴⁰

Nearly all of the county election staff who responded to our survey reported reviewing all six potential duplicate reports at least intermittently during the two months prior to an election. However, only 56 percent of county survey respondents reported that they followed OSS’s guidance to review each of the lists at least monthly when there is not an upcoming election.

Among the counties we visited, we found several sets of likely duplicate voter registration records that county election staff had not yet merged, some of which counties told us they had not previously identified.⁴¹ One staff person at a county we visited had not identified at least two sets of duplicate voter registration records because they did not regularly review all six duplicate reports. In another instance, a staff person theorized that they had overlooked a set of duplicates due to the large volume of potential duplicates they must review.



Potential Duplicate Voter Records Reports: Match Criteria

- Driver’s license number
- Date of birth and address
- Date of birth and Social Security number
- Last name, first initial, and date of birth
- Last name, first name, and address
- Last name, date of birth, and driver’s license number

— SVRS

³⁹ *Minnesota Statutes 2025*, 201.171.

⁴⁰ When counties “delete” duplicates, they merge the content of the two voter registration records and mark one of the records with a voter status of “Deleted” so that the duplicate record does not appear on election-day rosters, on publicly available voter lists, or in searches of SVRS.

⁴¹ During July through September 2025, we conducted in-depth interviews with county election staff from eight counties representing different population sizes and locations across the state. We conducted in-person follow-up meetings with four of the counties, during which we discussed a small number of voter registration records we had identified as potential duplicates.

RECOMMENDATION

Counties should regularly run and review SVRS reports designed to help them identify anomalies in lists of registered voters.

As the primary entities responsible for maintaining accurate lists of registered voters, county election staff should take advantage of the SVRS tools that OSS provides to help identify voter registration records that need attention. This includes reviewing all six *Potential Duplicate Voter Records* reports on at least a monthly basis, as OSS recommends. Regularly reviewing these and other reports for outliers or unexpected results could help the county election staff catch errors in their voter registration records or even identify voters who registered erroneously.

SVRS Modernization

In its 2018 report, OLA stated that SVRS was “an aging system that is showing signs of strain” and recommended that OSS begin to modernize the system.⁴² In our conversations with OSS, staff described making numerous important updates in response to changing circumstances in voter registration. These included adding system functions to improve performance related to absentee voting. OSS explained that it also made significant changes to implement a number of legislative changes to eligibility requirements and voter registration processes.⁴³ In addition to these improvements, OSS staff told us that they continually work to improve system performance and user experience.

UPDATE TO 2018 REPORT

OLA's 2018 *Voter Registration* report recommended that OSS *begin* to modernize SVRS.

RECOMMENDATION IMPLEMENTED

OSS has updated SVRS and begun work to support a broader modernization. The office acknowledges, however, that significant work remains.

Staff said, however, that SVRS needs a more significant overhaul.⁴⁴ OSS staff said that they have taken initial steps toward building a new, modernized voter registration system. These steps include, among other things, IT staff visiting county election offices to observe SVRS use and practices and gather user feedback on the system.

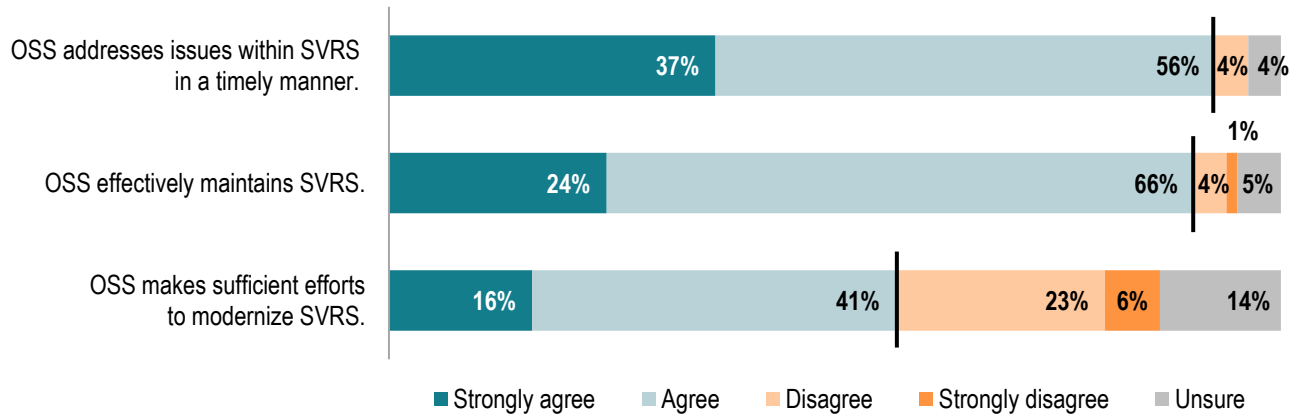
At least 90 percent of the county election staff who responded to our survey said that they agreed or strongly agreed that OSS effectively maintains SVRS and addresses technical issues in a timely manner, as shown in Exhibit 3.4. A smaller percentage (57 percent) of respondents agreed or strongly agreed that OSS has made “sufficient efforts to modernize SVRS.” Many county election staff commented that the system is outdated and in need of improvement. For example, one respondent said “SVRS does what it needs to do, but there are processes that shouldn’t have to take as many steps as it does. [SVRS needs] to be a little more user friendly.”

⁴² OLA, *Voter Registration*, 35–36.

⁴³ We discuss some of these legislative changes further in Chapter 4.

⁴⁴ SVRS was built in 2004. Among the issues with SVRS, OSS staff said that the dated technology is complex to modify to suit evolving needs and that user errors are difficult and time consuming to correct.

Exhibit 3.4

Survey Responses: To what extent do you agree or disagree with the following statements about OSS's management of SVRS?

Notes: Of the 82 county survey respondents, 81 or 82 responded to each question. Totals may not sum to 100 percent due to rounding.

Source: Office of the Legislative Auditor, survey of county election staff, 2025.

OSS Guidance

As we mentioned in Chapter 1, OSS does not have the authority to oversee counties or enforce their compliance with voter registration laws. Counties are responsible for the bulk of the processes involved in maintaining accurate lists of registered voters, which involves reviewing numerous data sources on an ongoing basis and updating voter registration records accordingly. OSS supports counties by providing the SVRS reports we discussed in this chapter, as well as written guidance in many forms:

- Minnesota rules
- Election administration guides for county election staff, election judges, and municipal staff
- Overviews of important processes, such as automatic voter registration and identity verification
- Step-by-step instructions with screenshots for completing common tasks in SVRS, such as adding or updating voter registration records and merging duplicate records

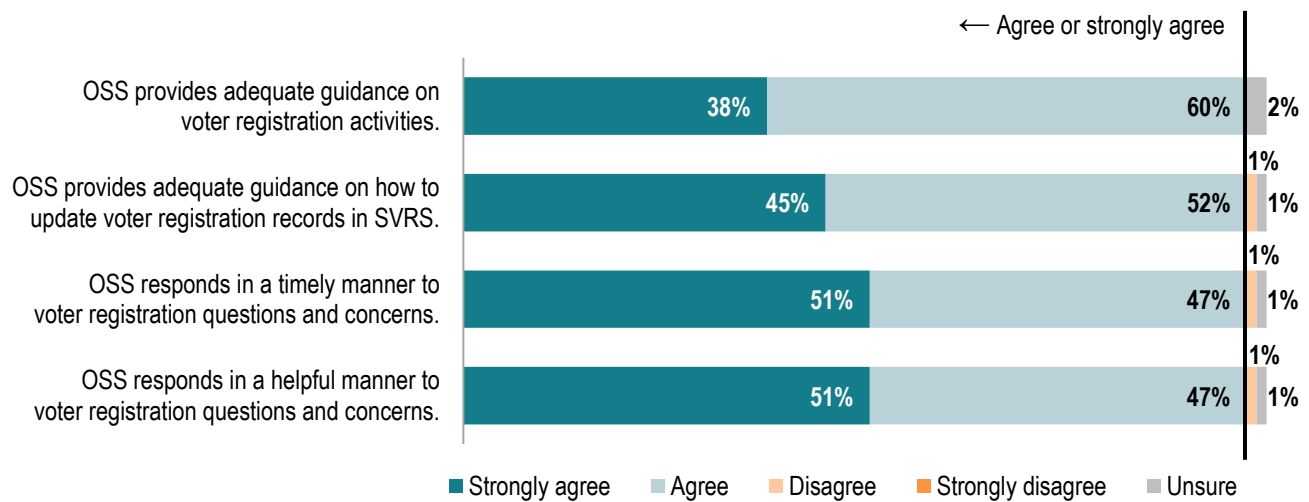
County survey respondents generally agreed that OSS provides useful written guidance for county election staff.

During our interviews and site visits, county election staff frequently referred to OSS administration guides. Two staff persons used election administration guides as reference while responding to our questions, while others told us that they direct election judges to consult the relevant election administration guide. We agree that OSS’s election administration guides and technical guidance are useful and aligned with legal requirements in the areas that we reviewed.⁴⁵

In response to our survey of county election staff, nearly all county survey respondents agreed or strongly agreed that OSS has provided adequate guidance to counties on voter registration activities and updating voter registration records. Similarly, the vast majority of county election staff agreed or strongly agreed that OSS has provided timely and helpful responses to their questions and concerns, as shown in Exhibit 3.5. In the words of one respondent, OSS is “a great ‘accountability’ partner to ensure that we are in constant compliance with statutory obligations.”

Exhibit 3.5

Survey Responses: To what extent do you agree or disagree with the following statements about the OSS?



Notes: Of the 82 county survey respondents, 81 or 82 responded to each question. While the response options for these questions included “Strongly disagree,” no county election staff selected that option. Totals may not sum to 100 percent due to rounding.

Source: Office of the Legislative Auditor, survey of county election staff, 2025.

⁴⁵ We identified some gaps in OSS’s guidance, which we have discussed elsewhere in this report. Earlier in this chapter, we discussed the need for OSS to establish guidance for how counties should comply with a legal requirement to notify individuals when a Challenged voter status has been removed from their voter registration record. We also recommended that OSS direct counties to provide OSS with copies of all referrals to county attorneys related to alleged voter registration or election violations.

When we offered survey respondents the opportunity to comment on OSS’s guidance, the majority of their comments were about positive interactions with OSS and the helpfulness of OSS’s staff. However, several county election staff commented that they wished to receive more support. The most commonly expressed frustration was that OSS does not generally provide case-by-case legal advice to counties. Several county election staff stated that OSS routinely redirects them to their county attorneys with voter registration questions; some pointed out, however, that OSS has more knowledge of the state’s voter registration processes than their county attorneys.



The OSS is always very helpful and the staff does their best to provide clear answers. However, it can be frustrating when a response is to consult our county attorney when the OSS is more educated on the election rules.

— County survey respondent

In addition to generally expressing positive opinions of OSS, the vast majority of county election staff who responded to our survey expressed confidence in Minnesota’s voter registration processes. As demonstrated in Exhibit 3.6, more than 90 percent of county survey respondents indicated that they were very or somewhat confident that the state’s voter registration processes ensure that (1) only eligible individuals are allowed to register to vote and (2) eligible individuals are not prevented from registering to vote.

Exhibit 3.6

Survey Responses: Generally, how confident are you that Minnesota’s voter registration processes accomplish the following?



Notes: All 82 county survey respondents replied to both questions. Totals may not sum to 100 percent due to rounding.

Source: Office of the Legislative Auditor, survey of county election staff, 2025.

OSS's Inactivation of Lapsed Voters

While it is typically the responsibility of county election staff to make changes to voter registration records, Minnesota statutes require that OSS inactivate the records of individuals who have not voted for a certain period of time:

After the close of the calendar year, the secretary of state shall determine if any registrants have not voted during the preceding four years. The secretary of state shall perform list maintenance by changing the status of those registrants to “inactive” in the statewide registration system.⁴⁶

The Help America Vote Act (HAVA) also addresses the removal of registered voters, saying that:

The State election system shall include provisions to ensure that voter registration records in the State are accurate and are updated regularly, including...a system of file maintenance that makes a reasonable effort to remove registrants who are ineligible to vote from the official list of eligible voters. Under such system, consistent with the National Voter Registration Act of 1993..., registrants who have not responded to a notice and who have not voted in 2 consecutive general elections for Federal office shall be removed from the official list of eligible voters, except that no registrant may be removed solely by reason of a failure to vote.⁴⁷

OSS conducts “annual list maintenance” every January. At that time, the office assigns a voter status of Inactive to any registered voter who has not voted or updated their registration in the preceding four years. Individuals whose voter registration records are marked as Inactive are effectively “removed” from the voter registration list. They are no longer considered “registered voters” and they must reregister before voting in the future.

Federal law, Minnesota law, and OSS practice establish different criteria for inactivating voter registration records.

Minnesota statutes and HAVA requirements for voter inactivation differ in two important ways: (1) whether to provide notification—and an opportunity to respond—to individuals whose voter registration records are going to be inactivated, and (2) the length of time that must elapse before inactivating an individual who has not voted. OSS staff explained that they interpret this provision of HAVA not to apply to Minnesota because Minnesota is exempt from the requirements of the National Voter Registration Act (NVRA). OSS staff also stated that HAVA provides different list maintenance procedures for states that are and are not exempt from NVRA. More specifically, OSS interprets HAVA to require states to “remove voters in accordance with the NVRA if the state is subject to that law or in accordance with state law if the

⁴⁶ *Minnesota Statutes* 2025, 201.171.

⁴⁷ *52 U.S. Code*, sec. 21083(a)(4)(A) (2024).

state is not subject to NVRA.”⁴⁸ We think it is unclear whether the exemption OSS cites is meant to encompass the HAVA provision on removing voters.

The National Conference of State Legislatures has compared how states remove or inactivate voters for lack of voting-related activity and found a variety of approaches. With respect to timing, one state removes voters who fail to vote in a single general election, while several states wait to remove voters until after 8 to 10 years of inactivity.⁴⁹

The differences between HAVA and Minnesota law result in differences in the way in which voters are inactivated. HAVA states that “no registrant may be removed solely by reason of a failure to vote” and that states shall remove individuals who have not voted in two consecutive general elections for federal office and failed to respond to a notice.⁵⁰ As noted previously, Minnesota statutes direct OSS to inactivate individuals after four years of not voting and do not establish a notice requirement.⁵¹ Without such notification, an individual may show up at the polls to vote believing they are still registered; such an individual would be required to reregister using election-day registration processes prior to being permitted to vote.

Further, the respective federal and state timelines for removing individuals from a state’s list of registered voters do not always result in the same removal date. Federal law allows states to remove a voter who misses two consecutive *federal* general elections.⁵² Minnesota statutes require removal of a voter four years after the last election that an individual voted in, regardless of the election type.⁵³ Assuming that a registered voter does not vote at all during a four-year period, the two standards would result in the same removal year, as shown in Exhibit 3.7. However, an individual who skips two consecutive federal elections while continuing to vote in *local* elections would not be removed under state law as soon as under federal law.

⁴⁸ Justin Erickson, Deputy Secretary of State for Operations, Office of the Secretary of State, response to questions from the Office of the Legislative Auditor, submitted via email to the Office of the Legislative Auditor, April, 9 2026. The response cited 52 *U.S. Code*, sec. 21083(a)(2)(A)(i)–(iii), as the basis for this statement.

⁴⁹ National Conference of State Legislatures, *Voter Registration List Maintenance* (2024), <https://www.ncsl.org/elections-and-campaigns/voter-registration-list-maintenance>, accessed April 21, 2025.

⁵⁰ 52 *U.S. Code*, sec. 21083(a)(4)(A) (2024). This language does not require states to send a notice to lapsed voters; rather, it specifies consequences for voters who fail to respond to such a notice *and* who have not voted for two consecutive general elections for federal office.

⁵¹ *Minnesota Statutes* 2025, 201.171.

⁵² 52 *U.S. Code*, sec. 21083(a)(4)(A) (2024).

⁵³ *Minnesota Statutes* 2025, 201.171.

**Exhibit 3.7
Removal Dates Under HAVA and Minnesota Statutes**

	Removal Date Under:	
	HAVA	Minnesota Statutes
Individual A: Last voted in November 2020 general election	January 2025: After not voting in 2022 and 2024 general elections	January 2025: After not voting in all elections from 2021 to 2024
Individual B: Last voted in a federal general election in November 2020, but voted in a local election in November 2023	January 2025: After not voting in 2022 and 2024 general elections	January 2028: After not voting in all elections from 2024 to 2027

Source: Office of the Legislative Auditor, analysis of Help America Vote Act of 2002, 52 *U.S. Code*, sec. 21083(a)(4)(A) (2024); and *Minnesota Statutes* 2025, 201.171.

OSS’s threshold for inactivating voter registrations varies even from the standards established in Minnesota statutes. While statutes require that an individual be inactivated after four years of *not voting*, OSS inactivates voters after four years of *inactivity*.⁵⁴ In other words, in addition to voting, any update to the voter registration record would reset the clock. OSS explained that it believes the purpose of the statute is to identify voters whose registration should be inactivated because they have moved or passed away. As a result, OSS does not inactivate voters who have registered or taken steps to update their voter registration record, even if the voter has not voted for more than four years.

RECOMMENDATION

The Legislature should consider revising the criteria for inactivating voter registration records.

Given the different interpretations of statute and recent changes in voter registration law—such as the implementation of automatic voter registration—we think it is a good time for the Legislature to reconsider the requirement to inactivate voter registration records based only on four years of not voting. Consistent with OSS’s interpretation, it may not be practical or desirable to inactivate an individual based only on whether they have voted in the last four years. For example, someone who has proactively updated their voter registration may be demonstrating an intention to vote in the future, or at least a desire to be registered. On the other hand, an individual whose voter registration record is updated automatically as the result of a driver’s license transaction may not reflect that same intention.

We also recommend that the Minnesota Legislature consider amending statutes to incorporate a process for notifying individuals before inactivating their voter registration; OSS should modify its rules to establish the details of the process, if such a change is adopted. Regardless of whether HAVA voter registration removal requirements apply to Minnesota, providing notice gives individuals an opportunity to respond before their record is inactivated and may prevent individuals from needing to reregister on election day when they are not prepared to do so.

⁵⁴ *Minnesota Statutes* 2025, 201.171.



OLA

Chapter 4: Impact of Recent Legislation

Maintaining integrity in the voter registration system is important. At the same time, making voter registration accessible ensures that all eligible individuals can register to vote. The Legislature has enacted several changes in recent years to encourage or facilitate voter registration.

In this chapter, we describe several recent legislative changes that affect voter registration and eligibility. We then discuss the impact of these changes on voters, counties, and voter registration processes.

Recent Legislative Changes

Since the Office of the Legislative Auditor (OLA) evaluated voter registration in 2018, the Legislature has enacted several changes that expanded access to voting or made the registration process easier.¹ Each of the changes we analyzed took effect in 2023 or 2024. Exhibit 4.1 provides a brief description of these recent changes.²

Exhibit 4.1

Key Legislative Changes to Voter Registration, 2023–2024

Law	Description
Automatic voter registration	An individual is automatically registered to vote if they provide citizenship-affirming documentation while applying for a driver's license, learner's permit, or state ID. The individual may choose to opt out.
Preregistration of 16- and 17-year-olds	An individual who is 16 or 17 years old may preregister to vote and is automatically registered on the day they turn 18 years old.
Registration using a physical description	An individual completing a paper application may provide a description of where they live if they lack a specific physical address.
Restoration of voting rights for individuals convicted of a felony	An individual who is no longer incarcerated for a felony offense has their civil right to vote restored.
Student residency list	Postsecondary institutions that enroll students receiving state financial aid must provide counties with a list of students living on campus or within the city. Students may register on election day using an approved ID and their school's residency list.

Source: *Laws of Minnesota 2023*, chapter 12, sec. 1; chapter 34, art. 1, secs. 5 and 9; chapter 62, art. 4, secs. 8 and 14; and *Laws of Minnesota 2024*, chapter 112, art. 2, sec. 6; codified as *Minnesota Statutes 2025*, 201.014, subd. 2a; 201.061, subd. 1b; 201.161; 135A.17, subd. 2; 201.061, subd. 3a; and 201.071, subd. 1, respectively.

¹ Office of the Legislative Auditor, Program Evaluation Division, *Voter Registration* (2018).

² We did not review the Driver's License for All law enacted in 2023. The law allows noncitizens to acquire a driver's license. This law, however, had no direct impact on eligibility to vote or voter registration processes.

Each of several recent legislative changes either expanded voter eligibility or made the voter registration process easier for particular groups of Minnesotans.

One recent legislative change (restoring voting rights to individuals upon the end of their incarceration) expanded who is eligible to vote. Other changes did not expand eligibility, but made the voter registration process easier for certain individuals. For example, individuals of voting age now become automatically registered to vote when applying for a driver's license using citizenship-affirming documentation.

Not every individual who could take advantage of a particular legislative change ultimately will. For example, not every formerly incarcerated individual will register to vote, and not every individual who has citizenship-affirming documentation will present it when applying for a driver's license. However, we present information in this chapter showing the potential impact of recent legislation.

Automatic Voter Registration

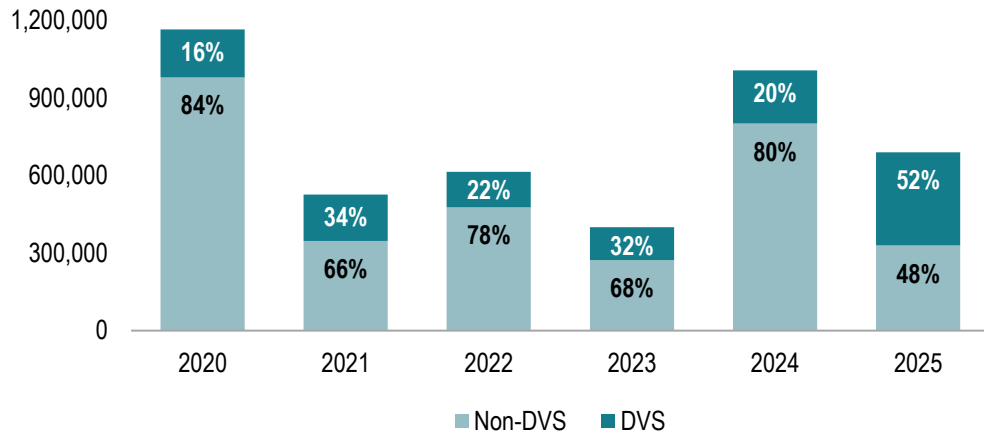
Prior to 2023, an individual could *opt in* to register to vote when they applied for or renewed a credential (driver's license, learner's permit, or state ID) issued by the Department of Public Safety's Driver and Vehicle Services Division (DVS).

In 2023, the Legislature enacted automatic voter registration (AVR).³ The law requires an eligible individual to be automatically registered to vote if they provide citizenship-affirming documentation while applying for a new or renewed DVS-issued credential. Unlike other application methods, an eligible individual "applying" via AVR does not actively fill out an application form to register to vote. Instead, DVS employees review the applicant's documentation and forward the application to the Office of the Secretary of State (OSS) if they determine that the documents affirm that the applicant is a U.S. citizen. Voters registered automatically through this process now have the opportunity to *opt out* of registration after county election staff have created their voter registration record.

As shown in Exhibit 4.2, the number of voter registration applications and updates that OSS and counties received from DVS increased substantially after OSS began processing AVR applications in April 2024. More than one-half of registration applications and updates that OSS and counties received in 2025 came from DVS, compared to about one-third or less that came from DVS from 2020 through 2024.

³ *Laws of Minnesota* 2023, chapter 34, art. 1, sec. 9, codified as *Minnesota Statutes* 2025, 201.161. The law took effect in June 2023 and gave DVS until December 2023 to implement its new processes. OLA is conducting a separate evaluation of DVS's implementation of AVR.

Exhibit 4.2
Voter Registration Applications and Updates, 2020–2025



Note: OSS began processing AVR applications in April 2024.

Source: Office of the Legislative Auditor, analysis of data from the Statewide Voter Registration System (SVRS).

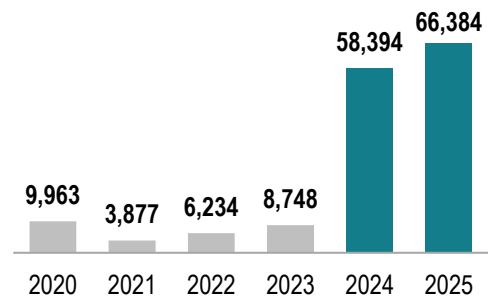
The proportion of voter registration applications *from first-time applicants* coming from DVS also increased after AVR was implemented. From 2020 to April 2024, OSS and counties received less than one-third of new applications from DVS. After OSS began processing AVR applications, the share of new applications that OSS and counties received from DVS increased to almost two-thirds.

Preregistration

Prior to 2023, an individual younger than 18 years of age could register to vote only if they would turn 18 before the next election. In 2023, the Legislature authorized preregistration for 16- and 17-year-olds.⁴ Preregistration is most common through AVR, but 16- and 17-year-olds can also register using other methods.

As shown in Exhibit 4.3, the implementation of preregistration for 16- and 17-year-olds appears to have contributed to a sharp increase in preregistration applications. Since preregistration went into effect in June 2023, the number of monthly preregistration applications that OSS and counties received increased by more than

Exhibit 4.3
Preregistration Applications, 2020–2025



Notes: Expanded preregistration for 16- and 17-year-olds took effect in June 2023. Most preregistration applications are new applications, rather than updates.

Source: Office of the Legislative Auditor, analysis of SVRS data.

⁴ *Laws of Minnesota* 2023, chapter 34, art. 1, sec. 5, codified as *Minnesota Statutes* 2025, 201.061, subd. 1b. The law took effect in June 2023. While entered in the Statewide Voter Registration System (SVRS), 16- and 17-year-olds have a voter status of Pending. SVRS automatically changes the voter status to Active when the individual turns 18.

650 percent. This is likely due, at least in part, to the expansion of preregistration eligibility to 16-year-olds in the state.⁵ Previously, 17-year-olds were the main beneficiaries of preregistration, since an individual could preregister only if they would turn 18 before the next election.

AVR has likely contributed to the large increase in preregistration applications. Between 2020 and the implementation of AVR, OSS and counties received 50 percent of preregistration applications from DVS. After AVR was enacted, OSS and counties received more than 90 percent of preregistration applications from DVS.

Physical Description

Applicants must provide a residential address when registering to vote, even if they are unable to receive mail at their residential address. State law requires counties not to process “deficient” applications, including those without a listed address.⁶

Prior to 2024, individuals without an address generally could not properly complete Minnesota’s voter registration application.⁷ In 2024, the Legislature required that Minnesota’s paper voter registration application form include a space for individuals to provide a physical description of where they reside (rather than an address) if they live in an area that lacks a specific physical address.⁸ The law was meant, in part, to help register individuals who experience homelessness. County election staff must use the description to assign a precinct to these individuals for the purposes of voting.

It is challenging to find the number of individuals who have experienced homelessness. The U.S. Department of Housing and Urban Development estimated that about 9,200 individuals in Minnesota experienced homelessness in January 2024.⁹ Despite the estimated size of Minnesota’s population of individuals who experience homelessness, the use of the physical description for voter registration is rare. As of February 2026, only 88 voter registration records contained a physical description rather than an address.

Some county election staff we spoke with told us that individuals who provided a physical description of their residence would likely not pass residency verification. They said that a postal verification card sent to a description of a residence will typically be returned to the county because the U.S. Postal Service cannot deliver mail to a described location. As we discussed in Chapter 2, a failed residency verification results in an individual’s voter registration record having a voter status of Challenged. One county election staff person told us that they encourage these individuals to follow election-day registration procedures so that they could vote before being challenged.

⁵ According to the U.S. Census Bureau, there were about 79,000 16-year-olds in Minnesota in 2024.

⁶ *Minnesota Statutes* 2025, 201.071, subd. 3; and *Minnesota Rules* 2025, 8200.2900.

⁷ OSS staff explained, however, that Minnesota also accepts the federal voter registration form, which has always included space for the applicant to draw a map of the location at which they live.

⁸ *Laws of Minnesota* 2024, chapter 112, art. 2, sec. 6, codified as *Minnesota Statutes* 2025, 201.071, subd. 1. The law took effect in June 2024.

⁹ U.S. Department of Housing and Urban Development, Office of Community Planning and Development, *The 2024 Annual Homelessness Assessment Report to Congress* (2024), 77. The number of individuals reflects a single point in time. We do not know how many individuals were of voting age, but the report indicates that nationwide, 81 percent of the people who experienced homelessness were age 18 or older.

Restoration of Voting Rights

Prior to 2023, individuals with a felony conviction who were incarcerated, on parole, or under other forms of correctional supervision were ineligible to vote under state law. If an individual was registered to vote before their conviction, county election staff would change the voter status on their voter registration record to Challenged upon receiving notice that the individual was serving a felony sentence.

In 2023, the Legislature restored the right to vote for individuals with a felony conviction who are no longer incarcerated.¹⁰ Such individuals can vote during any period when they are not incarcerated, including when on parole or under other forms of correctional supervision. As discussed in Chapter 3, OSS provides counties with a report listing registered voters who are no longer incarcerated. County election staff must remove a voter status of Challenged from a voter registration record if such a voter appears on the report.¹¹

According to the Department of Corrections, roughly 47,000 individuals under correctional supervision for a felony offense had their right to vote immediately restored when the law took effect in July 2023. For individuals who were already registered to vote, counties should have removed the incarceration challenges from their voter registration record. If not already registered to vote, these individuals could register without having their voter registration record challenged for incarceration.

Student Registration

Prior to 2023, students registering to vote on election day could register using their student ID without other documentation if they were on a student housing list provided by their postsecondary institution. However, postsecondary institutions could choose whether to provide a list, and students would be included on the list only if they lived on or near campus.

In 2023, the Legislature required all postsecondary institutions that enroll students receiving state financial aid to provide a current residential housing list to the appropriate county. The list must contain the names of students that reside on campus or *in the city or cities* in which the campus is located.¹² A 2024 amendment to the new law allowed students to register using any approved form of identification (not just their student ID).¹³ As a result of the legislation, more students living off campus can register on election day using an identification card without supplemental documentation.

¹⁰ *Laws of Minnesota 2023*, chapter 12, sec. 1, codified as *Minnesota Statutes 2025*, 201.014, subd. 2a. The law took effect July 1, 2023, and applied to any election on or after that date.

¹¹ If the voter is challenged for other reasons, the voter status of Challenged remains but counties remove Incarcerated as a status reason.

¹² *Laws of Minnesota 2023*, chapter 62, art. 4, sec. 8, codified as *Minnesota Statutes 2025*, 135A.17, subd. 2. The law took effect in June 2023.

¹³ *Laws of Minnesota 2024*, chapter 112, art. 2, sec. 5, codified as *Minnesota Statutes 2025*, 201.061, subd. 3a. The law took effect in June 2024.

According to the Office of Higher Education, more than 400,000 students were enrolled in a Minnesota postsecondary institution in 2024.¹⁴ While these students could choose to register using their approved identification card and a residential housing list, the law change has not significantly impacted the number of applications students submit on election day, overall. In both 2020 and 2024, fewer than 9,000 election-day applicants registered using an ID card and a residential housing list, accounting for 2.6 percent of election-day registrants in each year.

Discussion

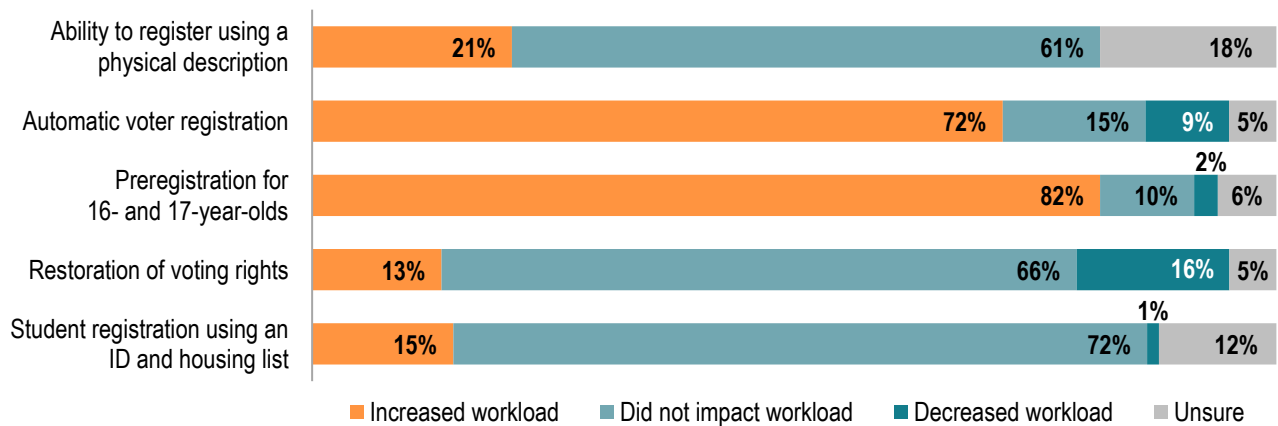
Determining the impact of legislative changes on voter registration is difficult. To determine how the new legislation could have changed counties’ workloads related to voter registration, we asked county election staff to share their insights on the recent changes.¹⁵

County election staff indicated that certain legislative changes affected their workload more than others.

Survey respondents indicated that the recent legislative changes have had varied impacts on their workload, as shown in Exhibit 4.4. Most survey respondents indicated that the changes related to registration using a physical description, restoration of voting rights for individuals formerly incarcerated for a felony offense, and student residency lists have not impacted their workloads.

Exhibit 4.4

Survey Responses: How has each of the following statutory changes impacted your county staff’s workload with respect to voter registration?



Notes: Of the 82 county survey respondents, 81 or 82 responded to each question. Totals may not sum to 100 percent due to rounding.

Source: Office of the Legislative Auditor, survey of county election staff, 2025.

¹⁴ The student enrollment count represents all students at each institution. Thus, students who are enrolled at more than one institution are counted more than once. “Student Enrollment Data,” Office of Higher Education, accessed April 17, 2026, <https://ohe.mn.gov/reports/student-enrollment-data>.

¹⁵ During the fall of 2025, we surveyed county election staff in all Minnesota counties and received responses from 82 of 87 counties (94 percent).

However, a large majority of survey respondents indicated that preregistration for 16- and 17-year-olds has increased their workload. Multiple county election staff commented on the survey that preregistration requires counties to spend more time printing and mailing letters notifying 16- and 17-year-olds that they are preregistered to vote. As one county election staff person said, “the time, supplies and postage cost [are] very high” for preregistration. Some county election staff said that the letters create more work for counties because 16- and 17-year-olds may not live at the same address when they later become eligible to vote.

In addition, nearly three-quarters of survey respondents reported that AVR has increased their workload. Several county election staff we interviewed and surveyed commented that AVR has increased the number of registrations to process. Beyond the volume, some county election staff said that the ability for individuals to opt out has created additional work for county election staff. For example, one county election staff person explained that the Statewide Voter Registration System (SVRS) is not well equipped to handle the opt-out process, and that county election staff must manually inactivate the voter registration records of individuals who opt out. The county election staff person said that if an AVR applicant’s voter registration record comes through just prior to the registration cutoff of 20 days before an election, the individual may decide to opt out of registration after the deadline has passed. If an individual opts out after county election staff prepared the election-day roster, OSS guidance directs county election staff to manually remove the individual from the roster.

To further examine how the new legislation could have impacted counties, we also analyzed the number of voter registration transactions—including adding or updating voter registration records, and inactivating the records of lapsed voters, among other things—that county election staff processed from 2020 through 2024. As shown in Exhibit 4.5, the total number of voter registration transactions has varied from year to year. Despite the legislative changes discussed in this chapter, county election staff processed fewer transactions in 2024 than they did in 2020 or 2022.¹⁶

Exhibit 4.5
Number of Voter Registration Transactions, 2020–2024

Year	Voter Registration Transactions
2020	1,801,130
2021	1,177,229
2022	1,984,232
2023	820,327
2024	1,482,233

Source: Office of the Legislative Auditor, analysis of SVRS data.

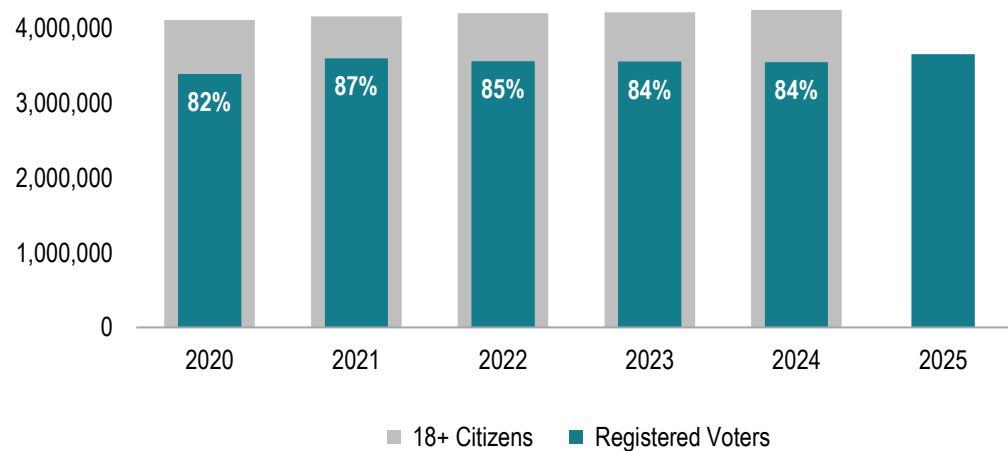
¹⁶ Counties processed the largest numbers of *applications* in the presidential election years of 2020 and 2024. According to OSS staff, there were unusually large numbers of some other transactions types in 2022 as a result of cleanup work related to redistricting.

While the number of registered voters increased slightly after the new legislation took effect, we cannot determine the extent to which the increase can be attributed to the legislation.

Since 2020, the number of citizens 18 years old or older in Minnesota has been relatively stable, growing less than 5 percent from 2020 to 2024.¹⁷ As seen in Exhibit 4.6, the number of registered voters in Minnesota has also remained fairly stable during that same time period.¹⁸ The proportion of voting-age citizens registered to vote peaked at 87 percent in 2021, but has since dipped to 84 percent in 2024.

Exhibit 4.6

Minnesota Citizens Aged 18+ and Number of Registered Voters, 2020–2025



Notes: Registered voters include all voters with an Active or Challenged voter status. Population estimates for voting-age citizens were not available for 2025.

Source: Office of the Legislative Auditor, based on data from OSS and the American Community Survey.

While the number of registered voters increased by 3 percent from 2024 to 2025 after the legislative changes took effect, the extent to which the increase can be attributed to the legislative changes is unknown. We cannot determine how individuals would have behaved had the new policies not been implemented. For example, we do not know how many individuals who were registered through AVR would have registered using another method in the absence of AVR. Similarly, we do not know whether preregistration for 16- and 17-year-olds made an individual more likely to vote when they turned 18 years old.

¹⁷ United States Census Bureau, American Community Survey, ACS 5-Year Estimates Comparison Profiles, Table CP05, “Comparative Demographic Estimates,” <https://data.census.gov/table?q=acs+age&g=040XX00US27&y=2020&d=ACS+5-Year+Estimates+Comparison+Profiles>, accessed May 20, 2026.

¹⁸ A registered voter is an individual who has a voter status of either Active or Challenged in SVRS.

List of Recommendations

- Counties should process all voter registration applications within the time frames established by law. (p. 19)
- Counties should follow state law and the Office of the Secretary of State (OSS) guidance when processing returned postal verification cards (PVCs). (p. 31)
- Counties should accurately document all returned PVCs in the Statewide Voter Registration System (SVRS). (p. 31)
- The Legislature should clarify the purpose and requirements of post-election reporting on returned PVCs. (p. 36)
- OSS should modify its monthly match reports on disqualifying conditions to include all matching voter registration records that counties have not yet updated. (p. 43)
- Counties should either update—or document their rationale for not updating—all voter registration records flagged by OSS for a disqualifying condition. (p. 43)
- Counties should send a notice to all individuals whose rights to vote have been restored, as required by Minnesota rules. (p. 45)
- OSS should establish guidance directing county election staff to immediately send the office copies of their voting-related referrals to the county attorney. (p. 47)
- Counties should send all voting-related referrals they send to county attorneys to OSS, as required by law. (p. 47)
- Counties should regularly run and review SVRS reports designed to help them identify anomalies in lists of registered voters. (p. 51)
- The Legislature should consider revising the criteria for inactivating voter registration records. (p. 57)



OLA



STATE OF MINNESOTA
Office of the Minnesota Secretary of State
Steve Simon

July 6, 2026

Judy Randall
Legislative Auditor
Office of the Legislative Auditor
140 Centennial Building
658 Cedar Street
St. Paul, MN 55155

Dear Ms. Randall,

Thank you for the opportunity to review and respond to the Office of the Legislative Auditor's (OLA) report and evaluation of Minnesota's voter registration systems.

The Office of the Secretary of State (OSS) appreciates the significant work that went into preparing this report. This work involved review of both state and federal laws, but also a comprehensive review of the data within the Statewide Voter Registration System (SVRS). The OLA was able to access this data because, under state law, the OLA has the authority to obtain data of any classification. *See* Minn. Stat. § 3.978, subd. 2. State law also requires the OLA to protect from disclosure any non-public data. Minn. Stat. § 3.979, subd. 1. For this reason, the OSS shared all data contained in SVRS with the OLA for their analysis of OSS compliance with state and federal legal requirements. Minnesota is proud of its accurate, fair, secure, accessible, and trusted elections system, and this report reflects the complex election administration work done at both the state and local levels to ensure compliance with both state and federal laws.

As the report reflects, the state law does not provide the OSS the authority to enforce county implementation of voter registration laws, and instead requires a robust partnership where the OSS maintains the voter registration system and provides guidance to counties, and the work to process voter registrations and manage voter records is done at the local level. This work to maintain accurate voter rolls is done by local election officials in Minnesota's 87 counties, and that work is supported on Election Day by hundreds of municipalities and by over 30,000 poll workers. Because Minnesota's election system is a state and local partnership, I am particularly pleased that this report shows that our county elections partners – those on the front lines of election administration – report that they are getting adequate guidance from the OSS and receive timely and helpful responses to their questions and concerns. I am also pleased that this

report shows that the OSS has generally established the appropriate procedures and is meeting its obligations to provide counties with the necessary data and reports to maintain accurate and up-to-date records within SVRS.

I have provided my office's specific response to each of the key recommendations contained in the summary of the report, and I look forward to working with the legislature and local election officials to implement these recommendations.

Recommendation 1: Counties should process all voter registration applications within the timeframes established by law.

We agree with this recommendation. The OSS provides guidance to counties consistent with this recommendation, and will work with counties to determine if there are improvements that can be made to further ensure compliance with this legal requirement.

Recommendations 2 and 3: Counties should (1) follow state law and OSS guidance when processing returned PVCs and (2) accurately document all returned PVCs in SVRS.

The OSS agrees with these recommendations. As this report reflects, the OLA could not validate the handling of less than 1% of the total PVC cases reviewed. While SVRS does have a module for counties to input information on the processing of PVCs, state law does not require that counties document the rationale for processing a returned PVC. Further, it is important to note that there are other pieces of returned election mail that are tracked separately and have their own unique processing requirements (for example, absentee or mail ballots). Because a county is not required to document the rationale behind processing a returned PVC, and because there are other pieces of returned election mail that may result in a change to the voter record, it is very likely that many or all of the remaining less than 1% were handled appropriately and in accordance with the law. However, the OSS agrees with the recommendation that requiring documentation of returned PVCs, including the return date and the reason, could aid in ensuring proper handling of PVCs and future validation of records.

The OSS will engage in a discussion with counties and legislative leaders about whether to legally require documentation, and if so, what information should be required to be documented within SVRS. The OSS will also explore with counties what type of reporting from SVRS would aid in improving PVC processing, and will commit to developing such a report as the OSS works to modernize SVRS.

Recommendation 4: The legislature should clarify the purpose and requirements of post-election reporting on returned PVCs.

The OSS agrees with this recommendation. The OSS engages in significant post-election data reporting, both voluntarily and as required by state and federal law. The PVC report is currently a labor-intensive process for both OSS and county staff, and we agree that in its current form meets the statutory requirements but provides only marginal value. The OSS will engage with both counties and the legislature to attempt to clarify the purpose of this report, and improve its utility for those that wish to use it.

Recommendation 5: Counties should either update – or document their rationale for not updating – all voter registration records flagged by the OSS for a disqualifying condition.

The OSS agrees with this recommendation. Further, the OSS agrees with the recommendation that the OSS should modify the monthly match reports on disqualifying conditions to make them more integrated with other established review queues. As the OSS modernizes SVRS, the OSS will work with counties to determine the most efficient and effective way to improve these reports. While the OSS is working with counties on the best way to improve these reports, the OSS will also re-send guidance to counties reminding them of the processes currently required to identify potentially disqualifying conditions, and will emphasize the importance of these monthly match reports.

Recommendation 6: Counties should send a notice to all individuals whose rights to vote have been restored, as required by Minnesota rules.

The OSS agrees with this recommendation, and believes that this recommendation will be implemented by counties following rule changes effective June 1, 2026, and the updated guidance recently distributed to counties by the OSS.

Recommendation 7: The Legislature should consider revising the criteria for inactivating voter registration records.

The OSS agrees with this recommendation. The OSS believes that legal requirements for inactivating voter registration records for lack of voting-related activity would benefit from further clarification. The OSS's current approach to inactivating voter registration records if the voter has not voted for four years, nor re-registered to vote during that time, has been in place for over 20 years. Since then, however, Minnesota's voter registration system has had the benefit of multiple new data sources to maintain the accuracy of voter rolls. While we believe Minnesota's current approach meets both federal law requirements, which gives states who are exempt from the National Voter Registration Act of 1993 (like Minnesota) substantial flexibility to craft their list maintenance procedures, and state law requirements, we agree that it is appropriate for the legislature to weigh the different policy considerations that would support changing the current process for inactivating voters for lack of voting-related activity. The OSS will commit to working with legislative leaders on this topic in the upcoming legislative session.

Finally, although not included in the summary page of recommendations, the OSS agrees with the recommendations in Chapter 3 directed to the OSS. Specifically, that the OSS should establish guidance directing county election staff to immediately send the office copies of their voting-related referrals to the county attorney, and that counties should send all voting-related referrals to the OSS, as required by law. The OSS currently receives communication about the outcome of these investigations and many, if not most, of these investigation stem from data provided by the OSS to counties. However, to meet this legal requirement the OSS has provided updated guidance to counties about the importance of providing the OSS copies of all voting-related referrals to the county attorney. The OSS will incorporate this into training materials and county administration guidance as well.

Thank you again for the opportunity to respond to the findings in your report, and for your office's work in preparing this report. As Minnesota's Chief Election Official, I am proud to oversee a system that provides broad access to eligible voters while maintaining the security necessary to preserve fair and accurate elections. The recommendations contained in this report will further enhance our nation-leading system.

Sincerely,

A handwritten signature in black ink that reads "Steve Simon". The signature is written in a cursive, flowing style.

Steve Simon
SECRETARY OF STATE



July 6, 2026

Judy Randall, Legislative Auditor
Minnesota Office of the Legislative Auditor, Room 140
Centennial Office Building
658 Cedar Street
St. Paul, MN 55155-1603

Dear Ms. Randall,

Thank you for the opportunity to review and comment on the Office of Legislative Auditor (OLA) program evaluation report on *Voter Registration*. Representatives from the Minnesota Association of County Officers (MACO) provided comments and suggestions to your office. Many of our members also participated in surveys and interviews conducted by your office to provide data evaluated in this report. It is our opinion that the information contained in the report has been thoroughly compiled.

When voter registration was last evaluated by your office in 2018 (with an update in 2019), our association provided a response. At that time, we commented that voter registration is a complex topic. That observation continues to be true in 2026 – and even more so with additional avenues to register to vote. These additional avenues to register, along with other new election laws, have placed new workload demands on county election offices that did not exist in 2018.

This current OLA report thoroughly describes registration processes and responsibilities from application to verification to maintenance, including compliance with state and federal registration requirements and county election office performance in these areas. It also discusses Statewide Voter Registration System (SVRS) functionality, Office of Secretary of State (OSS) support and guidance, and the impact of recent legislative changes on registration in Minnesota, among other topics.

The findings in the report confirm that county elections offices are consistently performing their work accurately and within state law and guidance provided by the OSS. Where the OLA has found that improvements can and should be made, we generally agree; but MACO wishes to offer the following additional context and insight into those recommendations for consideration when reading the report:

- **Recommendation 1: Counties should process all voter registration applications within the timeframes established by law.**

Counties agree that voters are entitled to full compliance with the law. It is important to note, however, that counties were nearly 100% compliant with these timeframes except for applications received immediately leading up to election day. There is a significant amount of work that needs to be prioritized during this period, including ensuring a safe, secure, and efficient election day; responding to voters and local election officials (including being open for voting two Saturdays, one Sunday, and one night before the general election); and the daily

administration of absentee and early voting. Additionally, the reality of USPS mail delivery timelines often negates the effectiveness of sending Notices of Late Registration to voters in the days immediately preceding an election.

MACO requests the Legislature review the laws and timelines for processing voter registration applications with the OSS and counties to ensure the appropriate level of voter registration service, balanced with administrative workload, and clarity of law.

- **Recommendations 2 & 3: Counties should (2) follow state law and OSS guidance when processing returned PVCs and (3) accurately document all returned PVCs in SVRS.**

Counties agree that residency verification for registered voters is important to ensure eligibility of voters and that they vote for candidates and contests on ballots for their precinct of residence. As noted in the report, 99% of applications were verified following correct processes. Of the approximately 191,000 applications reviewed, about 6,000 applications were not automatically verified and required the county to take action to verify residency. About 3,600 of these records contained adequate documentation for the OLA to verify the correct county action was taken.

The remaining 2,400 (one-third of the manually reviewed applications or about 1% of all application residency verification actions reviewed by the OLA) did not have documentation in SVRS sufficient for the OLA to determine if accurate verification processes were followed. As the OLA notes, it is not known if these cases represent inaccurate determinations (and therefore potentially inaccurate voter statuses) or if the determination was completed outside of SVRS.

The data reviewed by the OLA is not able to quantify the number of instances where a voter status should have been challenged or not challenged had the verification process been followed. All voters with active status certify each time they vote that they maintain residence at the address on their record, and if their status is challenged, must provide appropriate documentation to overcome the challenge. Additionally, the OLA's analysis does indicate some of these records lacking documentation were because of an SVRS system error where some Automatic Voter Registration (AVR) applications did not have a PVC automatically queued by the system.

MACO fully agrees it is important that the voter status in each SVRS voter registration record is accurate to help ensure a fair and secure election system. As an association, we will coordinate with the OSS to enhance training of county election staff to ensure proper processes are followed and documentation is sufficient within SVRS to support the decisions made by counties. This training may require USPS involvement to better understand the coding used on the returned PVCs. Counties also agree that using the PVC-return module within SVRS should be encouraged and welcome the opportunity to work with the OSS to enhance the functionality of the module. Perhaps the OLA report will also allow for discussion on other automated methods for verifying a voter's residence, and MACO welcomes discussing how those ideas may impact our work in maintaining the accuracy of Minnesota's voter registration records.

- **Recommendation 4: The Legislature should clarify the purpose and requirements of post-election reporting on returned PVCs.**

Counties fully support this recommendation and would welcome Legislative clarification. As noted in a survey response from one county, counties generally do not understand the utility of the report considering all the work that goes into sorting, reviewing, and documenting the PVCs.

MACO suggests the OLA recommendation be expanded for the Legislature to establish a study or work group of stakeholders to fully discuss and provide guidance to the Legislature regarding the PVC processes in general.

- **Recommendations 5, 6, & 7: The OSS should (5) modify its monthly match reports on disqualifying conditions to include all matching voter registration records that counties have not yet updated; Counties should (6) either update – or document their rationale for not updating – all voter registration records flagged by OSS for a disqualifying condition; and Counties should (7) send a notice to all individuals whose rights to vote have been restored, as required by Minnesota rules.**

Counties support the recommendation that the OSS modify its reports, including having them all be queues in SVRS, to aid in efficient and accurate county processing of these potential changes to voter registration records. SVRS queues will greatly reduce the likelihood a county inadvertently misses updating a record, for example. Having all reports under one consistent process, with documentation opportunities within the system, will address many of the issues identified by the OLA.

Counties appreciate the recent OSS guidance, following its June 2026 rules update, on ways counties can satisfy the requirement to mail notices to individuals whose rights to vote have been restored. This guidance, and additional OSS follow-up, will ensure even higher levels of compliance with rule. Counties do wish to acknowledge that the OLA analysis was for documented use of PVCs to meet these requirements while counties may have used other notification options outside of PVCs.

MACO also offers to coordinate with the OSS to enhance training of county election staff to ensure proper processes are followed and timelines are better adhered to. Similar to other professions, regular turnover in staff completing this type of complex and oftentimes irregular work requires ongoing training.

- **Recommendations 8 & 9: (8) OSS should establish guidance directing county election staff to immediately send the office copies of their voting-related referrals to the county attorney and (9) Counties should send all voting-related referrals to county attorneys to OSS, as required by law.**

Counties agree that they should comply with all relevant law in notifying the OSS on voting-related referrals they are making to their county attorneys and appreciates the OLA bringing this apparently inadvertently-overlooked provision in law to attention. As noted in the report, the OSS explained there has not been an expectation for counties to send all referrals and has very recently provided counties with clear expectations on this matter. The Legislature can and should expect compliance with this law; or alternatively, if the Legislature desires to review and potentially modify the notification requirements (i.e. timing or structure of notification) to align with current practice and/or provide clarity of expectations, MACO welcomes the opportunity to be part of those discussions.

- **Recommendation 10: Counties should regularly run and review SVRS reports designed to help them identify anomalies in lists of registered voters.**

Counties agree that utilizing the tools and reports the OSS provides to help identify voter registration records that need attention will ensure counties fulfill their responsibility to maintain accurate lists of registered voters.

MACO wishes to acknowledge that the OLA survey indicates sizable percentages of counties responded saying they were “unsure” if they had used the reports, which may indicate a terminology or survey respondent issue where the name of the report was unknown to the respondent or perhaps the person responding to the survey was not the person responsible for completing the report review processes. An additional observation on the timing aspect and the regular utilization of the report is that many of the staff responsible for this work are also responsible for full-time workloads outside of elections when not in an active election cycle. While the OSS guidance does suggest monthly review, this may not be possible as work collecting property taxes, maintaining homestead records, and other tasks may be prioritized.

Counties would welcome additional training and guidance from the OSS (and other counties) on the regular use of these reports, as well as potential development in SVRS of even more robust and efficient tools as the OSS continues works on the modernization of SVRS.

- **Recommendation 11: The Legislature should consider revising the criteria for inactivating voter registration records.**

Counties acknowledge the different interpretations discussed by the OLA. If the Legislature considers revising the criteria, MACO encourages including the impact and timing of any changes on counties’ work administering elections and maintaining voter registration records.

In addition to the above specific response to the OLA’s recommendations, MACO wishes to provide the following general considerations:

- **SVRS modernization**

The 2018 OLA report recommended the OSS *begin* to modernize SVRS. While the OSS has begun work to support modernization, necessarily most of the work thus far has been in response to increased absentee voting and to implement significant legislative changes. It is noteworthy that while over 90% of county respondents to the OLA survey agreed that the OSS effectively maintains SVRS, less than 60% agree that the OSS makes sufficient efforts to modernize it.

Counties respectfully request adequate funding and resources are allocated to this aging system so modernization can be proactively implemented. Counties believe that a modern, more user-friendly and efficient system with robust tools will help address many of the issues described throughout the OLA report, especially related to workload, timeliness of task completion, and documentation of actions.

- **Review of recent law changes**

The OLA report addresses the impact of some recent key legislative changes to voter

registration. Counties would like to add an administrator's perspective to some of these and respectfully request the Legislature further investigate if statutory changes may help with efficient administration of these laws (or alternatively if rules or process changes should be considered with the OSS).

Counties believe improvements can be made to the law and processes regarding Automatic Voter Registration (AVR). As noted in the OLA report, AVR does lead to very high levels of automated verification of records and is responsible for an increasing percentage of preregistration applications. The processes, such as how opt-out notices are mailed out and the timing of pending records and the interaction with registration cut-off timeframes, are suitable for additional discussion. The OLA reports 72% of counties reported increased workload as a result of AVR, so any efforts to make this workload as efficient as possible is welcome.

Counties similarly believe improvements can be made to either the laws, rules, or processes related to the preregistration for 16- and 17-year-olds. 82% of counties reported increased workload as a result of this new law. SVRS system modernization may be necessary to fully recognize efficiencies for this category of pending voter registration records.

Not included in the OLA report, because it is not voter registration-related, is the workload associated with the new permanent absentee ballot laws. MACO mentions this as an example of another draw on the workload for county election staff and any efforts to make a law that is well-received by voters work more efficiently for counties will ensure counties can provide the correct level of priority and attention to the issues identified in this OLA report.

In conclusion, MACO underscores the importance of minimizing changes to election laws, rules, and processes during an active election cycle. Our members are prepared to meet, discuss, and collaborate on improvements identified in this report; however, we encourage careful consideration of the timing of any changes and the operational requirements needed for effective implementation.

County election administrators are tasked with an important responsibility of conducting elections. They work to ensure each election is administered fairly and efficiently in compliance with the law and administrative rule. They do so while responsibly managing taxpayer resources and maintaining their nonpartisan standing in the processes. Election administrators take pride in the important work of ensuring every eligible voter who wishes to cast a ballot can do so in an election that is free, fair, secure, and accurate.

Thank you for the opportunity to comment on the OLA *Voter Registration* program evaluation. MACO hopes this program evaluation report will increase knowledge and help inform all parties considering modifications to voter registration statutes and other election laws, enabling proposals that enhance cost effectiveness, reduce administrative burden, improve, and increase voter understanding and transparency.

Respectfully yours,



Cory Kampf
Anoka County Chief Financial Officer
President, Minnesota Association of County Officers



OLA

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Assisted Living Facility Licensing
Automatic Voter Registration
Board of Animal Health Oversight of Companion Animals
Minnesota Agricultural Water Quality Certification Program (MAWQCP)
Minnesota Board of Public Defense

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Guardian ad Litem Program, March 2018

Economic Development

Department of Employment and Economic Development Grants Management, March 2025
Minnesota Investment Fund, February 2018
Minnesota Research Tax Credit, February 2017

Education (Preschool, K-12, and Postsecondary)

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Collaborative Urban and Greater Minnesota Educators of Color (CUGMEC) Grant Program, March 2021
Compensatory Education Revenue, March 2020
Debt Service Equalization for School Facilities, March 2019
Early Childhood Programs, April 2018
Perpich Center for Arts Education, January 2017
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Public Facilities Authority: Wastewater Infrastructure Programs, January 2019
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Financial Institutions, Insurance, and Regulated Industries

Department of Commerce's Civil Insurance Complaint Investigations, February 2022

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Oversight of State-Funded Grants to Nonprofit Organizations, February 2023
Sustainable Building Guidelines, February 2023
Office of Minnesota Information Technology Services (MNIT), February 2019

Health

Community Benefit Expenditures at Nonprofit Hospitals, February 2025
Minnesota Department of Health: Human Resources Complaint Management, January 2025
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Worker Misclassification, March 2024
Unemployment Insurance Program: Efforts to Prevent and Detect the Use of Stolen Identities, March 2022

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RentHelpMN, April 2023
State Programs That Support Minnesotans on the Basis of Racial, Ethnic, or American Indian Identity, February 2023
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Voter Registration, March 2018

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Metro Mobility, April 2024
Southwest Light Rail Transit Construction: Metropolitan Council Decision Making, March 2023
Southwest Light Rail Transit Construction: Metropolitan Council Oversight of Contractors, June 2023
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