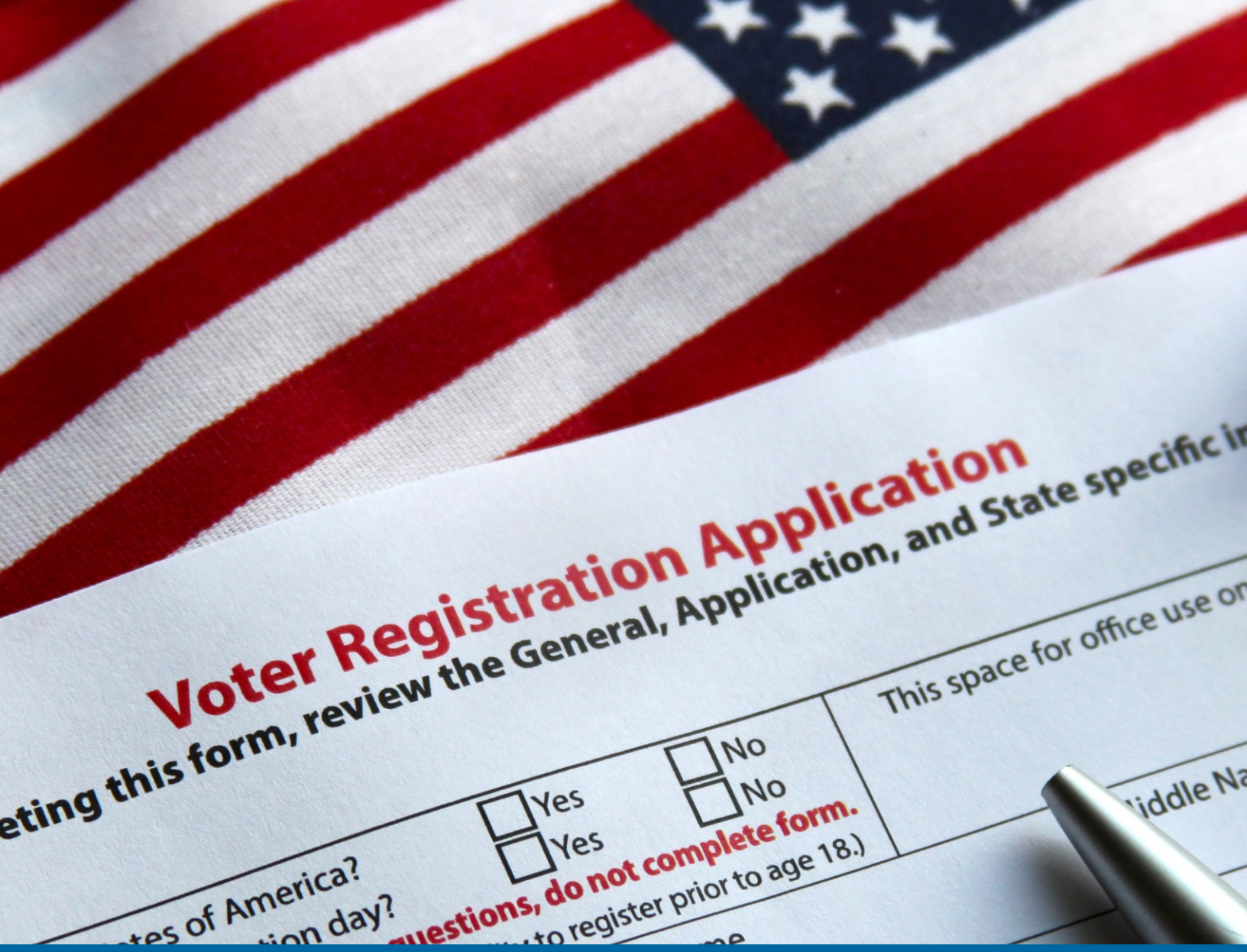


SPECIAL EXAMINATION • REPORT NUMBER 25-09 • AUGUST 2026

Voter Registration and List Maintenance

Requested information on agency procedures and voter data

Greg S. Griffin | State Auditor
Lisa Kieffer | Executive Director

DOAA
Georgia Department
of Audits & Accounts

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Performance Audit Division
Greg S. Griffin, State Auditor
Lisa Kieffer, Executive Director

Voter Registration and List Maintenance

Requested information on agency procedures and voter data

Why we did this review

The Senate Appropriations Committee requested this special examination of voter registration and list maintenance procedures. Based on this request, we reviewed: (1) name and address validation procedures for voter registration; (2) list maintenance policies and procedures; and (3) the extent to which these procedures align with statutory requirements and best practices.

About voter rolls

The Georgia Secretary of State's (SOS) Elections Division hosts the state's official list of voters. U.S. citizens legally residing in Georgia may register to vote at age 17.5 (but must be 18 to vote) if not serving a felony sentence or found mentally incompetent to vote. County election officials review voter applications and determine eligibility. Because voters commonly move or otherwise become ineligible to vote, state and local election officials must practice ongoing list maintenance by adding or updating voter information and removing ineligible voters from the voter rolls. Such maintenance is essential and required to protect against voter fraud and minimize election-related costs, but laws are intended to balance the need for accuracy with voter protection against disenfranchisement.

In September 2025, 8.0 million individuals were registered to vote in Georgia. In fiscal year 2026, the SOS Elections Division received $15.3 million in state and federal funds, and one-time funding of $15 million in state grants to be allocated to county election offices.

What we found

The Secretary of State (SOS) and county registrars' processes related to voter rolls comply with statutory requirements and generally align with best practices. Controls exist to ensure only eligible voters are registered and voter lists are sufficiently maintained, but our review identified additional opportunities for improvement.

Controls over voter registration are generally effective; however, opportunities for improvement exist.

Georgia's voter registration system utilizes automated processes to verify applicant identity and eligibility with third-party sources, as well as to restrict the entry of invalid residential addresses. Based on our review, we estimate no more than 0.1% of the voter registration records would have allowed an individual to vote despite an unverified identity, invalid residential addresses, or unverified eligibility due to citizenship issues.

- **Unverified identities** – We confirmed the identity of 99.8% of the 7.9 million voter records containing a REAL ID number, matching name components and other identifying information such as date of birth. Most of the 17,855 unmatched records either include a social security number, which can be used to verify identity, or have been placed in a registration status that requires further documentation before they can vote. Nevertheless, we estimate between 790 and 1,160 voters' identities cannot be confirmed with information listed on the registration, yet their status does not indicate further documentation is needed prior to voting.

  We did not attempt to confirm identity associated with the approximately 129,000 voter records that did not contain a REAL ID number. For these, the county registrar could have used the reported social security number—which most of the 129,000 have—to verify identity.

- **Invalid addresses** – State law requires voters to register using the address associated with their permanent residence. We identified 2,784 registrations with residential addresses for P.O. boxes (or similar companies), which are prohibited from being used to establish residency. Additionally, we identified 965 registrations listing a Georgia Department of Corrections facility or county jail. Finally, we identified 3,027 registrations with address errors (e.g., placeholder terms indicating missing or invalid information such as "missing street address").
- **Unverified citizenship** – State and federal law require U.S. citizenship to vote in elections. When REAL ID records indicate individuals do not possess U.S. citizenship, state law requires county registrars to obtain proof. Among the 7.9 million voter records with a driver's license number, we identified approximately 2,600 voters currently or previously in active status who could not be verified as U.S. citizens on their REAL ID, through federal database searches, or in the voter registration system.

  Some of these problematic registrations were due to operational control weaknesses within the Department of Driver Services (DDS) that created REAL IDs with incorrect citizenship status or submitted voter registrations prior to REAL ID approval. After identifying these weaknesses, DDS reviewed records for all active driver's licenses with U.S. citizen status and identified 3,285 additional REAL IDs that were issued without necessary identity and citizenship documentation. After further research, DDS reported it confirmed U.S. citizenship for 750 and lawful presence (but not U.S. citizenship) for 678; DDS canceled the remaining 1,857 IDs that could not be verified.

It should be noted that the numbers in this section cannot be totaled because some represent projections based on a sample reviewed; additionally, overlap may exist across the three categories.

List maintenance practices generally align with laws and best practices, but controls and guidance could be strengthened.

In accordance with laws and best practices, state and local election offices utilize third-party sources for voter eligibility updates (deaths, felony convictions, etc.) and typically process records within required timeframes. However, inherent challenges impact list maintenance effectiveness, which depends on accurate initial registrations, independent judgment from staff across 159 counties, and information from third parties that may lack the necessary data to match voter records (e.g., USPS change of address notifications).

State and local officials also reported conducting regular quality control checks—including duplicate checks, transaction reviews, and address validations—in accordance with best practices, though processes vary by county. However, we identified errors with voter records, including those with incorrect or invalid dates and duplicate registrations. These errors account for less than 1% of active voter registrations and may be remedied through strengthened controls and oversight.

Lastly, best practices emphasize the need for adequate staffing, training, and written guidance. While local officials generally reported that staffing is sufficient and relevant training is attended, state officials expressed a need for additional personnel to better monitor county processes. Additionally, we found that written policies and procedures were limited at the state and county levels.

What we recommend

We recommend SOS continue its efforts to ensure an applicant's identity and eligibility are verified and valid addresses are used for voter registrations. Additionally, we recommend SOS strengthen its oversight by creating additional guidance for counties related to list maintenance topics and quality control procedures over voter registration data. Finally, SOS should strengthen controls to minimize data errors.

We recommend DDS correct improperly issued REAL IDs, ensure any changes in citizenship status are reported to SOS for voter registration action, strengthen examiners' accuracy in verifying identity and citizenship documents, and resolve the issue that resulted in the submission of voter applications prior to REAL ID approval.

See **Appendix A** for a detailed listing of recommendations.

Agency Response: *SOS generally agreed with recommendations aimed at strengthening existing processes but indicated several conclusions and recommendations "do not fully reflect the statutory framework governing voter registration" or the "practical operation of the state's voter registration and list maintenance practices." SOS noted that "where recommendations align with our existing authority and ongoing efforts, the Secretary of State's Office agrees and remains committed to continual improvement." It also noted that it "remains committed to administering elections that are secure, accessible, and compliant with all applicable legal requirements."*

DDS generally agreed with recommendations and noted that it takes its responsibility seriously and is in full compliance with legal requirements for issuing driver's licenses and IDs, as well as voter registration data transmission. DDS further noted that while it already had systems in place, the audit noted some weaknesses that have since been addressed through strengthened controls, training, and disciplinary actions. Concerning the recommendation to ensure that changes in citizenship status are reported to SOS for voter registration action, DDS clarified that it "only checks citizenship status when the customer initiates a transaction related to his/her state-issued credential." Furthermore, DDS explained that the issue causing examiners to inaccurately assign citizenship status was limited to the inaccurate review of birth certificates.

DDS and SOS also provided technical corrections, which were incorporated into the report.

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Purpose of the Special Examination

This review of Georgia's voter registration and list maintenance procedures was conducted at the request of the Senate Appropriations Committee. Our review focuses on the following questions:

- To what extent does Georgia's voter registration process ensure that the elector's list includes voters' full legal names and valid residential and mailing addresses?
- To what extent do state and county policies and procedures for list maintenance align with statutory requirements and best practices?

A description of the objectives, scope, and methodology used in this review is included in **Appendix B**. A draft of the report was provided to the Georgia Office of the Secretary of State and the Georgia Department of Driver Services for their review, and pertinent responses were incorporated into the report.

Background

In all states except North Dakota, U.S. citizens must register before they can vote in federal, state, and local elections. Because voters commonly move or otherwise become ineligible to vote (e.g., due to criminal conviction or mental incapacity), it is necessary for state and local election officials to practice ongoing list maintenance by adding or updating voter information and removing ineligible voters from the voter rolls. Ensuring individuals registering to vote meet eligibility requirements—and keeping voter lists up to date and accurate—is essential for protecting against voter fraud, minimizing voting wait times, and minimizing costs (e.g., by not sending mail to old addresses).

Relevant State and Local Entities

Georgia's voter rolls are primarily managed by the Office of the Secretary of State and county registrars. The Department of Driver Services also plays a role in the process. Each are described below. Activities related to voter registration and list maintenance are discussed beginning on page 3.

Secretary of State

Georgia's Secretary of State (SOS) serves as the state's chief election official and hosts a centralized voter registration database—the Georgia Registered Voter & Information System (GARViS). Implemented in 2023, GARViS creates and stores the official voter list, which has information on voter registration, voter participation, and other election management data (e.g., candidate records). Election officials work within GARViS, which connects with several webpages—including the SOS Online Voter Registration (OLVR) and My Voter Page (MVP)—and with county election offices to allow near real-time data transmission. It also uses an automated programming interface to connect to external data sources, such as the Department of Driver Services' database.

The State Election Board

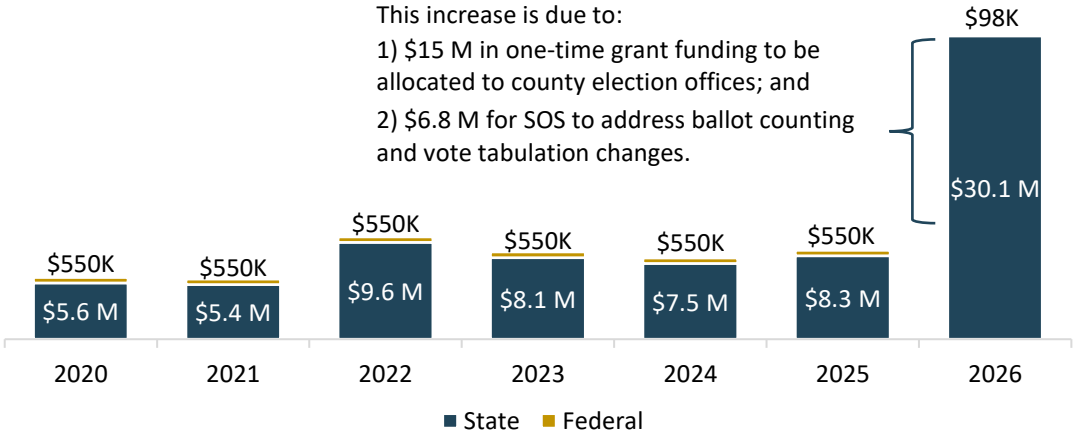
The Georgia State Election Board (SEB) was established by statute and is made up of five members. Since a 2023 legislative amendment, the SEB is attached to SOS for administrative purposes only. The SEB promulgates rules and regulations to promote uniformity in election practices, conducts hearings pertaining to county compliance with Georgia Election Code, and may order compliance or prohibit conduct that violates code. SOS can refer counties to the SEB over election administration practices.

The SOS Elections Division is primarily responsible for duties related to voter rolls, which include preparing and furnishing information on voter registration and voting, maintaining the official voter list, training county registrars, and performing other duties as required by law. The division has 18 staff involved with election management and oversight of county election administration. Additional SOS employees in the IT and Legal Divisions support elections, which includes providing information system support and sharing information with election officials. Finally, the SOS Investigations Division supports the Elections Division by handling elections-related investigations.

Between state fiscal years 2020 and 2026, the SOS Elections Division received $78.5 million (see **Exhibit 1**). Most ($74.7 million) is from state appropriations, which have increased significantly since 2020, primarily due to changes to election-related infrastructure (e.g., GARViS, hand recount of ballots) and partly due to increased postage and printing costs (e.g., precinct cards). Moreover, in the amended fiscal year 2026 budget, $15 million was appropriated in one-time grant funding for county election offices. Additionally, SOS received $3.4 million in federal funding for election security through the Help America Vote Act (HAVA) and the Coronavirus Aid, Relief, and Economic Security (CARES) Act.[1]

Exhibit 1

State appropriations for elections increased in recent years (state fiscal years 2020-2026)



Source: State appropriations acts

[1] *CARES awarded funds in 2020, and the grant program expired on March 26, 2022.*

County Election Officials

Counties must determine applicants' voter eligibility and perform list maintenance by reviewing and acting upon information impacting voter eligibility. Each county has a board of registrars or a board of elections and registration with three to five members. Counties may also have a chief deputy registrar and/or clerical staff responsible for daily voter registration and list maintenance duties. Additionally, to facilitate collection of voter registration applications, O.C.G.A. § 21-2-215 states that the heads of every high school, college, or university in the county (e.g., principal, assistant principal, president, or assistant president) shall be a deputy registrar.[2]

Department of Driver Services

The Georgia Department of Driver Services (DDS) is responsible for issuing non-commercial, commercial, and motorcycle licenses. DDS issues drivers' licenses and state identification cards based on the requirements set out in the federal REAL ID Act of 2005. For example, those applying for a REAL ID must submit documentary proof of identity, age, residency, and either U.S. citizenship or lawful status. Georgia's REAL ID program has been fully implemented since 2012.

In September 2016, Georgia implemented the automatic voter registration (AVR) system (22 other states also use AVR).[3] When an individual obtains or renews a drivers' license or state identification card through DDS, the system automatically submits a voter registration application to SOS (unless the individual opts out, is not at least 17.5 years old, or is not a U.S. citizen). Eligibility verification and voter registration are the responsibility of SOS and county registrar offices.

Voter Registration

According to O.C.G.A. § 21-2-216 individuals must meet the following requirements to register to vote in Georgia:

- United States citizen;
- Legal resident of the Georgia county/municipality in which they seek to vote;
- At least 17.5 years of age (but 18 years of age to vote);
- Not serving a sentence for conviction of a felony;[4] and
- Not found mentally incompetent to vote.

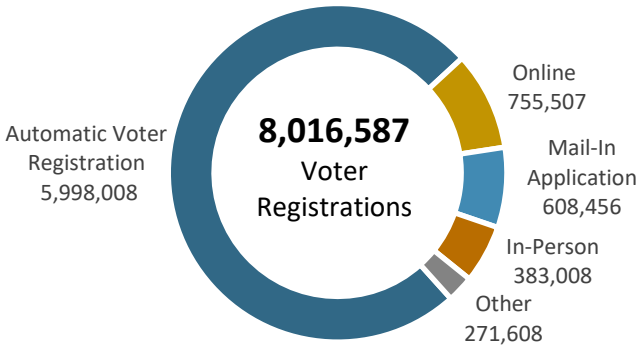
As of September 2025 (the date we obtained records from SOS), voter rolls include approximately 8.0 million registrations. The majority (7.3 million or 91%) are active, meaning the voter has interacted with the election system within the last five years.

[2]These individuals generally help with voter applications. Voter eligibility is determined by the county election staff.
[3]Georgia, Connecticut, and Oregon were the first three states to implement AVR, which was made possible under the National Voter Registration Act (NVRA, commonly known as the "Motor Voter Act"). NVRA requires most states—including Georgia—to offer voter registration opportunities to individuals conducting business at their respective bureaus of motor vehicles.
[4]Individuals do not lose their right to vote if they plead nolo contendere or are serving a sentence under the first offender or conditional discharge acts without having been adjudicated guilty.

Approximately 700,000 (9%) are inactive due to reasons such as no contact for five years, leaving the state, or returned mail; these voters may be removed if inactivity continues, as explained on pages 8-9. Both active and inactive voters can vote, request absentee ballots, or sign petitions. Approximately 15,000 (<1%) are pending; these voters cannot participate until eligibility is confirmed.

Individuals may use several methods when applying to become a registered voter.[5] Approximately 75% of registrations were created through DDS's AVR system (see **Exhibit 2**). Individuals may also directly submit online applications through the SOS web portal (known as Online Voter Registration or OLVR) or completed paper applications to the appropriate county registrar.[6]

Exhibit 2
Nearly 6 million voter registrations (75%) have been added or updated through the DDS AVR system (September 2025)



Source: Office of the Secretary of State electronic voter registration records

Regardless of the method, the individual's identity and eligibility information must be verified prior to registration. Federal and state statutes govern the verification of various eligibility criteria, as described below.

- **Identity** – In accordance with the federal Help America Vote Act (HAVA), applicants' names and dates of birth are confirmed by matching their driver's license or social security number information on the application with records from the motor vehicle agency or the Social Security Administration (SSA).[7] O.C.G.A. § 21-2-220.1 establishes comparable verification standards.

[5] To be eligible to vote in an election, applications must be made by the registration deadline—typically 29 days prior to any upcoming election.

[6] A small number of registrations have other registration codes such as the Electronic Registration Information Center (ERIC) or National Change of Address. These codes are related to list maintenance activities and indicate an existing registration was altered due to a change identified by these sources. Additional records have no registration code and are associated with records created prior to the implementation of GARViS.

[7] If an individual does not possess a Georgia driver's license or state identification card, nor a social security number, or if the information provided does not correspond with DDS or SSA records, the applicant will still be registered. However, they must present documentation at their initial voting attempt.

It should be noted that the 1993 National Voter Registration Act (NVRA) requires states to "ensure that any eligible applicant is registered to vote in an election" and that states may only require "such identifying information… necessary to enable the appropriate state official to assess the eligibility of the applicant." SOS has interpreted this to mean minor discrepancies between the name on a registration form and identity documents, which do not impact eligibility determination, should not prevent someone from registering.

- **Citizenship** – Pursuant to the NVRA, all applicants are required to affirm their citizenship status under penalty of perjury; however, submission of documentary proof of citizenship is not mandated during registration. Judicial decisions have determined that states may not impose additional documentary proof of citizenship requirements for federal registration forms, a policy applicable to Georgia's paper applications.[8]

  While paper-based registration applications cannot require proof of citizenship, those initiated through the automatic voter registration process can. This is because under the 2005 REAL ID Act, which sets standards for states' drivers licenses and ID cards, applicants must provide proof of citizenship (e.g., birth certificate, U.S. passport, naturalization card) or lawful presence to obtain a REAL ID. Only individuals who provided proof of U.S. citizenship are eligible to register to vote through AVR.

- **Residency** – Eligibility for voter registration in Georgia is limited to individuals who are residents of both the state and the specific county or municipality where they seek to vote. Residency requirements are stipulated by state law (O.C.G.A. § 21-2-217), which mandates that an applicant's residence must be their permanent domicile and expressly prohibits the use of post office boxes or similar mail addresses for this purpose. Although applicants are not required to provide proof of residence when registering to vote, proof is necessary for the REAL ID, which generates an automatic voter registration application. The REAL ID Act requires applicants to furnish at least two documents selected by the state that display the individual's name and principal residence.[9]

As shown in **Exhibit 3**, DDS data is used to verify voters' identity, residency, and citizenship status for AVR registrations, as well as online and paper applications that include a driver's license number. Pursuant to HAVA and state law (O.C.G.A. § 21-2-220.1), individuals registering to vote are required to provide their current driver's license or identification card number, if available. State law (O.C.G.A. § 21-2-216 (g)) mandates that SOS establish procedures to verify voter registration information using DDS records. Furthermore, O.C.G.A. § 21-2-221.2 stipulates that information submitted through the state's online portal (referenced on page 4) must also be verified using DDS data. As a result, nearly 98% of the 8.0 million registrations as of September 2025 were subject to validation through DDS.

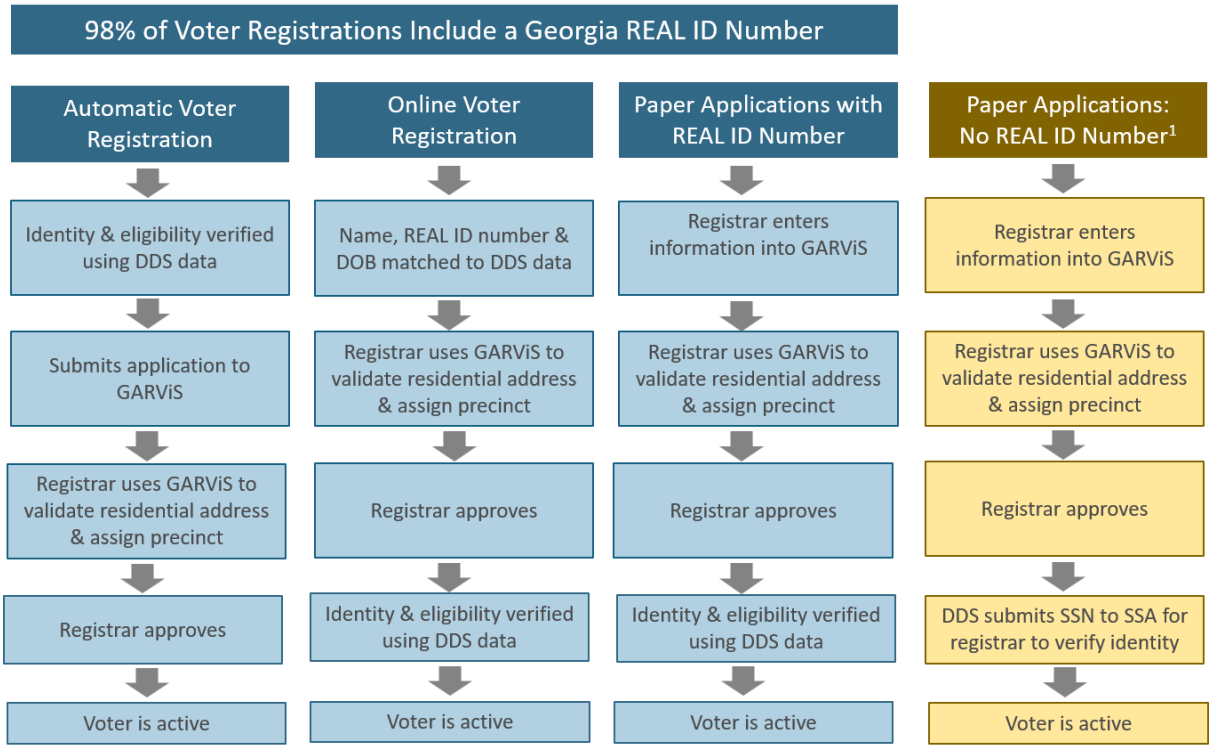
[8] State law (O.C.G.A. § 21-2-216(g)) requires voter registration applicants to present proof of citizenship and restricts county registrars from determining the eligibility of applicants without such proof.

[9] Accepted documents include postmarked USPS mail, mortgage or lease statements, deeds, utility bills, insurance policies or premium bills, and government-issued documents.

With the exception of registrations initiated online, county registrars are responsible for confirming the reported address is valid and appropriate for precinct assignment. For those applications without a REAL ID or social security number, county registrars or poll workers are required to validate identity and eligibility through a document review. Registrars then assign the registration as active (i.e., issuing a precinct card) or pending (due to missing or invalid information), or they reject the application.[10]

Exhibit 3

DDS data is used to verify identity and eligibility for 98% of voter registrations



[1] If an application does not include a Georgia REAL ID number or a social security number, the application is placed into a status that requires the applicant to provide identity documentation prior to being eligible to vote. If an application includes a social security number but not a REAL ID number, DDS data is only used to verify identity.

Source: Office of the Secretary of State, Department of Driver Services

Voter List Maintenance

List maintenance largely involves comparing the voter registration database with other agency records or conducting outreach to identify individuals whose eligibility may have changed. As a result, voter information can be updated and ineligible voters can be removed. The process and frequency for reviewing records can vary by state, though parameters are established in federal law.

[10] Applications with missing identity information can still be approved by county registrars and assigned a precinct; however, these applications are placed into active MIDR (Missing Identification/Documentation Required) status. These voters must provide the identity document prior to voting.

Federal Requirements

To protect against disenfranchisement, the NVRA limits the reasons for and the timing of the removal of voters from the registration database. States may cancel a voter's registration due to death, mental incapacity, criminal conviction, and written confirmation of a change of address outside of the voter's jurisdiction. Additionally, NVRA prohibits removing registrants solely because they fail to vote and establishes a notice-and-waiting process for identifying and removing these inactive voters (discussed further on pages 8-9). NVRA also requires that list maintenance be uniform, non-discriminatory, and in compliance with the Voting Rights Act of 1965.[11] Finally, states must complete "the systematic removal"[12] of ineligible voters no later than 90 days prior to a federal primary or general election.

HAVA requires each state to ensure its database is accurate and current by:

- Regularly obtaining information on voters from agencies that manage the state's felon and death records;
- Updating voter records expeditiously; and
- Eliminating duplicate records.

State Requirements

To identify potentially ineligible voters, state laws require data and information sharing with select state agencies and via interstate data-sharing agreements (see **Exhibit 4**). (Information on ineligible voters shall also be provided to the Council of Superior Court Clerks of Georgia to help maintain the accuracy of the statewide master jury list.) O.C.G.A. § 21-2-231 also authorizes county officials to search newspapers, obituaries, and use verifiable knowledge to determine whether a voter has died. Finally, O.C.G.A. §§ 21-2-229 and 21-2-230 allow a voter to challenge the qualifications of another voter, which a county may use as a basis for canceling a voter record or denying a registration application.

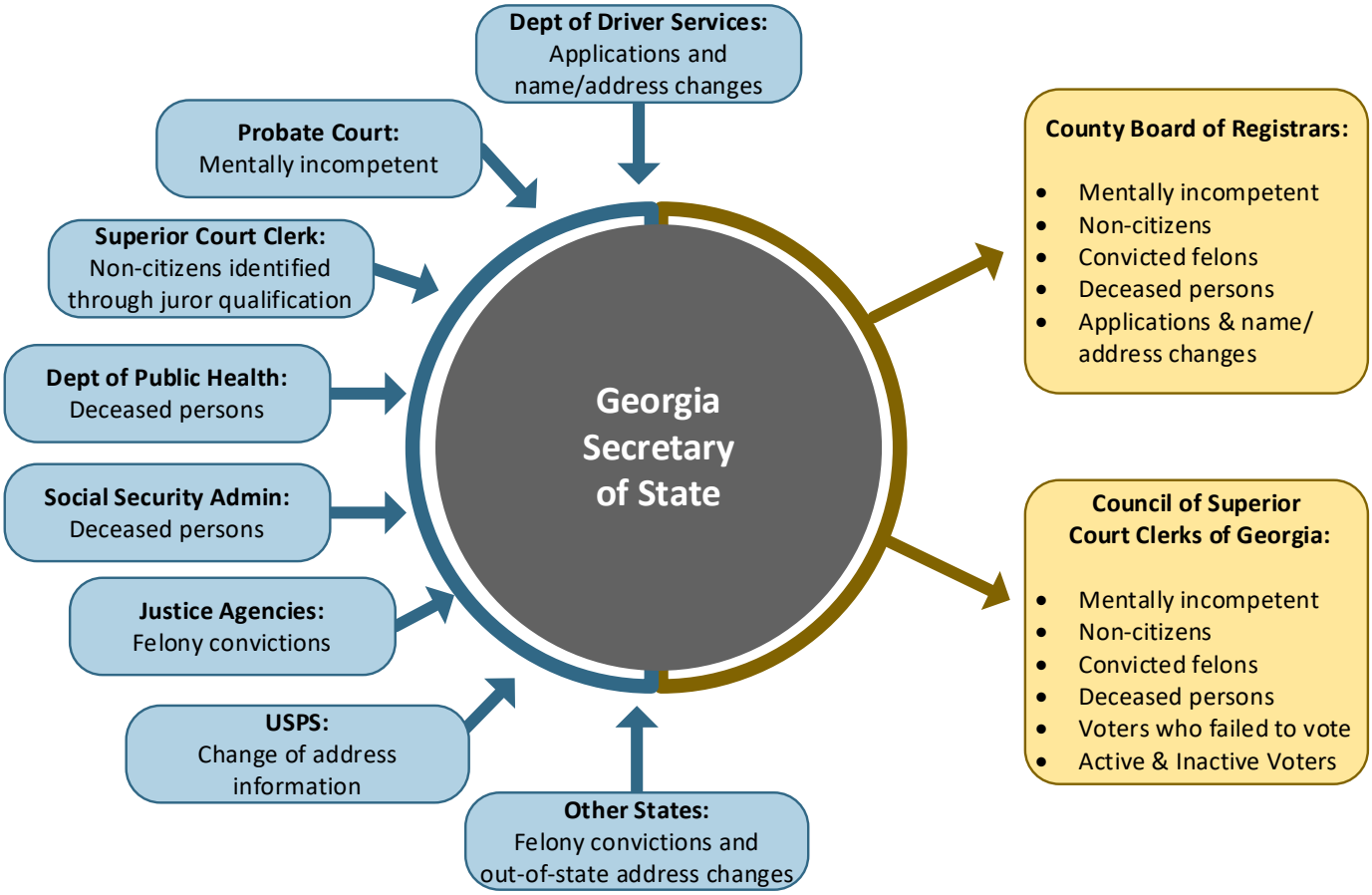
Since 2019, Georgia is one of 27 jurisdictions[13] (26 states and Washington, D.C.) that share data through the Electronic Registration Information Center (ERIC). O.C.G.A. § 21-2-232 requires SOS to "regularly" obtain information through ERIC on voters who may have died, moved, or otherwise become ineligible to vote (e.g., registered in a different state). While not required by law, Georgia also has state-to-state agreements with four states: Alabama and Florida (which are not ERIC members), as well as South Carolina and Virginia.

[11] The Voting Rights Act of 1965 primarily bars practices determined to be discriminatory (e.g., use of poll taxes or tests).

[12] NVRA does not define "systematic;" however, SOS attorneys indicated statewide general mailings are subject to this provision. Department of Justice guidance notes voter challenges based on large-scale comparisons with third-party databases are also restricted.

[13] Virginia announced it rejoined ERIC on April 30, 2026.

Exhibit 4
Regular information sharing is required for list maintenance[1]



[1] NVRA requires the U.S. attorney's office to share federal felony convictions with states. Additionally, information is obtained from the Social Security Administration, the U.S. Postal Service, and other states primarily through Georgia's membership with ERIC.

Sources: NVRA, HAVA, Georgia Election Code, and ERIC documents

Inactive Voters

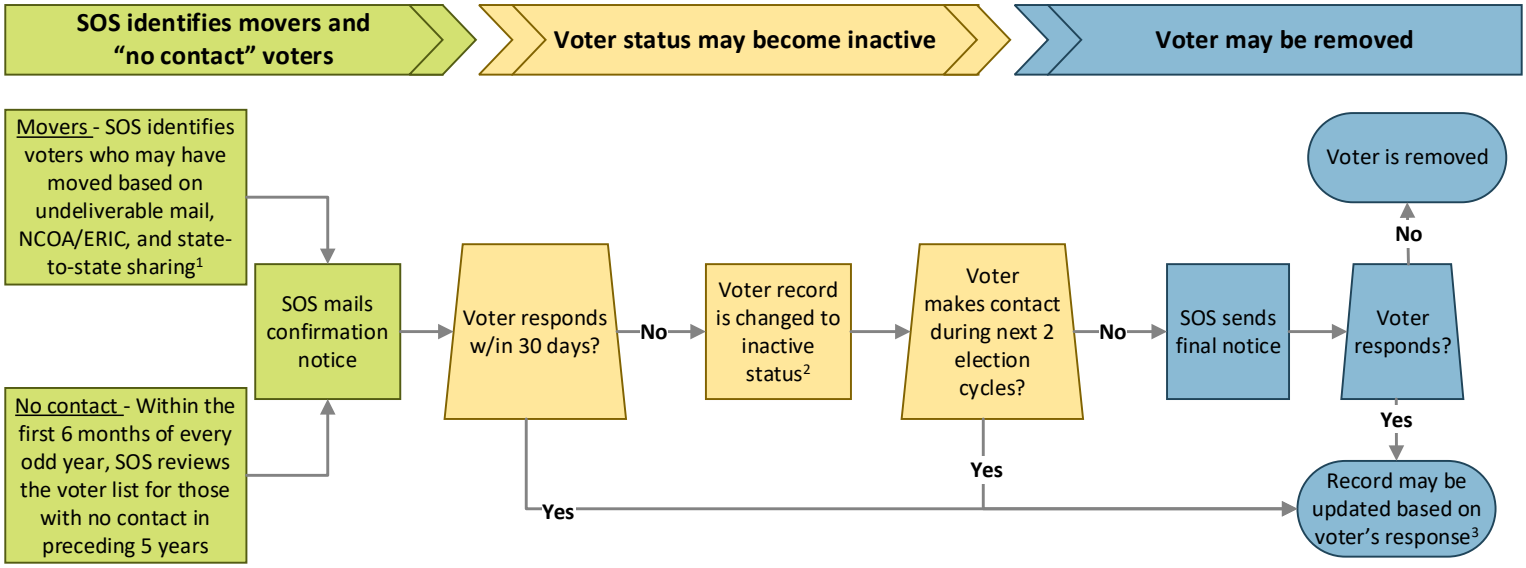
In accordance with O.C.G.A. § 21-2-235, SOS must maintain a list of active and inactive voters. As described below, registered voters are active unless determined to be no-contact or to have likely moved.

- **No-Contact** – "No contact" means that within the preceding five calendar years, the registrant has not filed an updated voter registration card, filed a name or address change, signed a petition, voted, requested an absentee ballot, or confirmed continuation of residency at the same address. O.C.G.A. § 21-2-234 requires SOS to identify no-contact voters and mail them a notice during odd-numbered years. Failure to respond to the notice within 30 days results in becoming inactive.
- **Change of Address** – Pursuant to O.C.G.A. §§ 21-2-232 through 21-2-234, election officials must use information from interstate data sharing and the United States Postal Service (USPS) to identify voters

who have likely moved out of the jurisdiction and who may be designated as inactive. SOS mails a notice to voters who have either filed a National Change of Address with USPS or have obtained a more recent driver's license or voter registration in a different state. Additionally, if USPS returns any election mail to the county registrar indicating it is undeliverable, the registrant is mailed a confirmation notice. Failure to respond to these notices within 30 days results in an inactive designation.

Inactive voters remain eligible to sign petitions and may vote if they affirm in writing their continued residency within the county. If they indicate in writing they have moved to a new county, their registration shall be transferred. However, pursuant to the NVRA, beginning on the date of the no-contact or change-of-address notice, voters who fail to respond to notices, fail to vote in two consecutive federal general elections, and have remained no-contact during this period may be removed from the voter rolls (see **Exhibit 5**).

Exhibit 5
Registered voters identified as inactive may be removed from the voter rolls



[1] This process excludes signed voter registrations sent by other states.

[2] If NCOA shows a within-county move for which no response is required, no designation of inactivity will occur.

[3] Removal occurs if the voter confirms an out-of-state move, but if the voter confirms an out-of-county move, then the registration will be transferred to the new county.

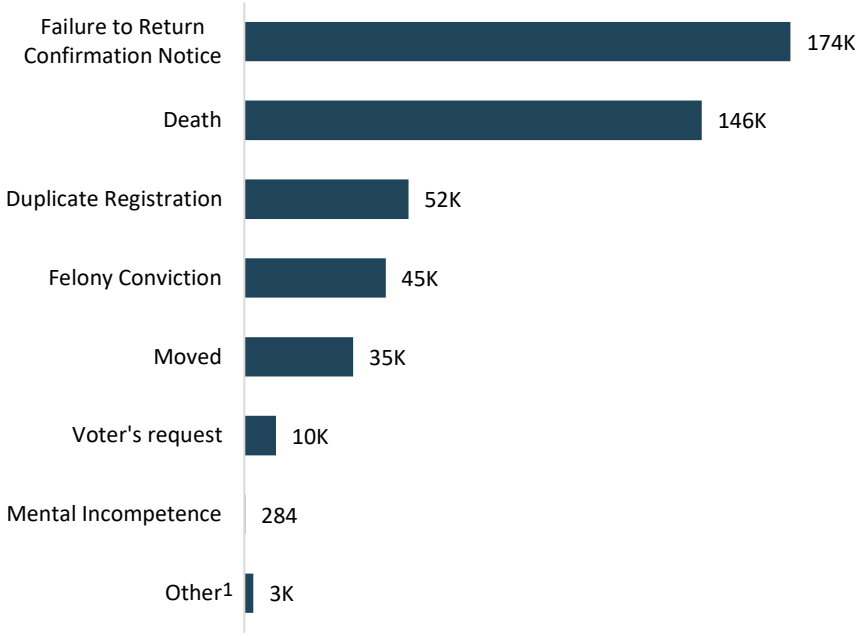
Source: O.C.G.A. §§ 21-2-232 through 21-2-235

Prior to cancellation, O.C.G.A. § 21-2-235 requires a final notice to be mailed no sooner than 60 days and no later than 30 days before removing the record. Under this process, for example, Georgia voters designated inactive prior to the 2022 federal general election—who remained no contact after the conclusion of the 2024 federal general election—would have received a final notice in 2025 alerting them that their registration will soon be canceled.

Voter Cancellations

As part of list maintenance, approximately 466,000 Georgia voters were removed from the rolls during the 2022-2024 federal election cycle. Most cancellations (nearly 70%) were due to failure to respond to a confirmation notice and death (see **Exhibit 6**).

Exhibit 6
Approximately 466,000 voters were removed during the 2022-2024 federal election cycles



[1] Other cancellation reasons include non-citizens identified through juror qualification, third-party challenges to voter registrations, and clerical errors.

Source: Election Administration and Voting Survey data

Requested Information

Finding 1: Nearly all voter registration identities could be validated using name and other information collected by DDS.

An individual's legal name is one of multiple pieces of information used to confirm a voter's identity, which also include date of birth, social security number, and driver's license number. As such, it is not necessary that all name components are listed on the voter registration. Using DDS data, we were able to validate the identity of nearly all voter registrations that listed a REAL ID number. For those that could not be confirmed using this process, a detailed inspection is necessary to ensure only those with validated identities are able to vote.

When registering to vote, individuals report their name, along with other information. Neither federal nor state law requires or defines a "full legal name" for voter registration purposes. While the Federal Election Commission stipulates that the national mail voter registration form (Georgia's mail-in application) must provide fields for first, middle, and last names, as well as a section for suffixes, it does not mandate that these fields be completed for the application to be approved. Additionally, a voter's "full legal name" is not required to identify duplicate registrations.[14]

According to the NVRA, election officials may not deny an individual's voter registration application based on minor errors or omissions if they are not material in determining the individual's qualifications. When examining a voter's name, for example, the omission of a component from the application (e.g., middle name) is likely irrelevant if the application includes sufficient documentation from which to determine voter eligibility, such as social security number, birth certificate, or photo identification.

SOS procedures indicate DDS records are used to confirm an applicant's identity and voter qualifications for nearly all voter registration applications. Because more than 98%[15] of voter registrations include a Georgia REAL ID number, we requested from DDS the most recent record associated with each voter registration to determine whether the information on the DDS record confirmed the identity and qualifications of the voter registration.

DDS was able to provide 7,880,641 REAL ID records for the 7,887,762 voter registrations that included REAL ID numbers.[16] We conducted a series of matches on various components, including name, date of birth, and social security number.

[14] SOS's current election software (GARViS) allows county registrars to use various criteria to identify potential duplicates during the voter registration process. Four tests are used during registration to determine duplicate records: (1) full driver's license exact match; (2) full social security number exact match; (3) first name, last name, birth date, and last four digits of social security number match; and (4) first name, birth date, and last four digits of social security number match.

[15] Approximately 129,000 voters did not have a REAL ID number included in their registration information. For these voters, the county registrar would use the reported social security number—which most of the 129,000 have—to validate their identity.

[16] The remaining 7,100 records (0.1% of the 7.89 million) could not be located in the DDS system even with a search on other information such as name and date of birth.

Although "full legal name" has not been defined for voter registration, for REAL ID purposes, a full legal name must be consistent with what is on the document provided to prove identity (e.g., birth certificate or passport).

As shown in **Exhibit 7**, DDS records confirmed the identity of 7,869,907 (99.8%) of the 7,887,762 voter registrations that listed a REAL ID number. The majority (7,065,611 or 90%) were confirmed based on the voter's REAL ID number and the full name. Additional confirmations were based on the REAL ID number combined with other iterations of voter name (e.g., first and last; first initial of first and last) or combined with information such as the social security number and date of birth.

Exhibit 7
Nearly all voter registrations could be confirmed using REAL ID data (September 2025)

Criteria Combinations Tested								Number Verified
REAL ID #	First Name	First Initial of First Name	Middle Name	Last Name	Suffix	Last 4 Digits SSN	DOB	
X	X		X	X	X			7,065,611
X	X		X	X				81,381
X	X			X				555,705
X		X		X				53,415
X				X		X	X	9,516
X	X					X	X	68,551
		X		X			X	35,728[1]
							Identity Verified	7,869,907
							Identity Not Verified With Data Analysis[2]	17,855

[1] DDS was unable to locate records for 42,849 REAL ID numbers listed in the voter registration data, indicating an incorrect number was recorded in the voter registration record. However, we were able to use a combination of two or more of the following elements—name, date of birth, social security number, and zip code—to identify 35,728 matching records with a different/corrected REAL ID number.

[2] Unable to verify with the above data-matching tests. Other documents or information available to county registrars may confirm identity.

Sources: Office of the Secretary of State electronic voter registration records, Department of Driver Services REAL ID records

Approximately 17,900 registrations (or 0.2% of the population reviewed) could not be matched with DDS records to confirm identity using our criteria, either because they had an invalid driver's license number or the number provided did not match the individual's information, as described below. A portion of records may be identified with other data or a detailed visual inspection. Others have already been flagged by SOS as problematic and placed in a status of "Missing Identification/Documentation Required" (MIDR[17]), which requires the individual to provide proof of identity prior to voting. However, we estimate between 786 and 1,163 voters whose identities cannot be verified with the reported REAL ID number or a social security number and have

[17] *MIDR differs from "pending status" because the application is approved and the voter may cast a ballot when they present the missing required identity document.*

not been flagged in the voter registration record as requiring additional identity documentation.[18]

- **Invalid REAL ID Number** – For 7,121 registrations, DDS had no match for the listed REAL ID number, and we could not find the individual using other criteria such as name and date of birth. The majority (5,064 or 71%) included a social security number that the county registrar could have used to verify identity and approve the registration.[19] Among the 2,057 with no social security number, 1,502 (73%) are in MIDR status or pending. The remaining 555 registrations are problematic because their identity cannot be verified using a valid driver's license or a social security number; 166 have a voting history (see text box below for a description of voting history). It is possible that county registrars verified some of these registrations through information not available in the registration data obtained for this audit.
- **Unmatched Information in DDS** – For 10,734 registrations, a record was identified in DDS, but the identity could not be confirmed using the criteria listed in **Exhibit 7**. We conducted an in-depth visual examination for a representative sample of 988 registrations.[20] In 583 records (59%), we observed slight name differences (e.g., Betsey vs. Elizabeth[21]) that would validate identity and explain why the record failed our data matching criteria. Among the 405 without a match, the majority (311 or 77%) included a social security number that the county registrar could have used to verify identity. Among the 94 with no social security number, 56 were in MIDR status. Of the remaining 38 registrations that were not in MIDR status, 12 have a voting history. Again, it is possible county registrars verified identity through other information not available in the registration data.

  To ensure the sample we used was representative of the population, we calculated a sample size necessary to yield a 95% confidence interval with a ±3% margin of error for the population proportion. Our resulting sample was randomly selected and did not include duplicates.[22] Based on the sample review, we estimate between 231 and 608 individuals have not been flagged in the registration data as requiring additional identity documentation despite having identities that cannot be verified with driver's license or social security numbers. We estimate no more than 281 of these have likely voted.

We provided SOS with a list of the unverified records for further review. After their review, any remaining registrations that cannot be verified based on current information can be placed in MIDR status.

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[18] Although state law (O.C.G.A. § 21-2-417) requires all registered voters to present photo identification to vote in person, the law also allows first-time voters who registered to vote by mail and did not present identification to vote as long as they provide a document such as a copy of utility bill, bank statement, or paycheck with their name and address to poll workers. In these cases, identity would not be verified with a photo identification prior to voting.

[19] This requires a full social security number. The data we requested included only the last four digits.

[20] The representative sample was taken from 10,197 records in active or inactive status. Records in pending status were removed from the population of 10,734 for this analysis because a voter in pending status cannot receive a ballot until the reason for the status is resolved.

[21] Not an actual example.

*[22] See **Appendix B** for additional methodology related to sampling and calculating estimates based on sample results.*

For the purposes of this report, we obtained only the last vote date rather than all instances in which an individual voted

Data obtained from SOS for this audit included a single record for each voter registration, including name, address, registration date, current status, and last vote date. The "last vote date" field indicates whether someone has voted at least once by displaying their most recent voting activity. This field does not reveal the total number of times an individual voted, nor does it indicate participation in elections prior to the latest vote recorded. Comprehensive voting history found in SOS's database was not necessary to meet our audit objectives.

Recommendation

1. SOS should review the records of individuals with identities that could not be confirmed with DDS records. If identity cannot be verified with existing information, these records should be placed in MIDR status.

SOS Response: *SOS agrees with the finding and partially agrees with the recommendation. SOS stated that "Georgia law requires all individuals to present Photo ID documenting their identity to vote. Because of this Photo ID requirement, election officials confirm the identity of any registered voter before the voter is permitted to cast a ballot."*

SOS agrees "to review records of individuals whom DOAA could not match with DDS records and will take appropriate action based on the findings of this review where legally permissible." However, "SOS may only remove registered voters from the active voter list when certain [state and federal] statutory requirements are met."

Finding 2: Although automated controls help prevent invalid addresses, some voter registrations with these addresses remain.

State law requires voters to register using the address associated with the place where they reside and intend to remain. Additionally, residency cannot be established in any county or municipality unless voters intend to make the county or municipality their permanent abode. While the majority of voter addresses reflected what could be considered a permanent residence, we identified instances of addresses that would not qualify as valid to establish residency and justify an assignment to a voter precinct.

A person's residence is statutorily defined as "that place in which such person's habitation is fixed" and where they intend to remain.

Voter addresses are included in registration documents to determine eligibility based on residence and assign the voter to the appropriate voting precinct, which is particularly important for non-statewide elections such as U.S. congressional, state legislative, and local elections. The determination of voting eligibility based on

residence is largely governed by state law.[23] While O.C.G.A. § 21-2-216 provides a general eligibility standard of residence within the state, as well as a county or municipality, other statutes further define acceptable residential addresses. For example, according to O.C.G.A. § 21-2-217, a person's residence (which is required to be included on voter registrations) is "that place in which such person's habitation is fixed" and where they intend to remain.

We compared residential addresses from the voter registration list with data obtained from USPS Coding Accuracy Support System (CASS)-certified third-party software[24] to identify instances in which the address may be insufficient to establish a voter's residence. As described below, we identified addresses that would not qualify voters to vote in their assigned precinct. These include addresses related to post offices and similar companies or criminal justice facilities, as well as those with erroneous information. In total, these invalid registration addresses represent 0.05% of the approximately 8.0 million on the voter roll as of September 2025.

Many of the addresses discussed below were from registrations created prior to the implementation of the SOS's GARViS system in 2023. GARViS includes several automated controls that will help ensure new registrants' addresses are valid permanent residences, specifically mitigating risks related to commercial and erroneous addresses. However, some records from the prior system may still need to be checked and corrected.

Post Offices and Similar Companies

Post offices, mail rooms, commercial mail receiving agencies, or virtual mail companies are businesses where an individual can receive mail in a place that is not where they live. State law (O.C.G.A. § 21-2-217) prohibits voters from using a post office box or private mailbox service address to establish residency.

We identified 2,784 voter registrations that listed these company addresses as their residential address. Most (2,769 or 99.5%) were in active/inactive status and 1,741 (63%) had a voting history[25] meaning at least one vote has been recorded in GARViS (see text box on page 14). The majority occurred in the Metro Atlanta region (with 62% in Fulton County); however, there were instances throughout the state.

Most of the records identified (2,091 or 75%) were created through the motor vehicle registration system; however, DDS's requirements related to proving residency are currently insufficient for both REAL ID issuance and voter registration. Although first-

[23] Federal regulations (11 CFR Part 9428) require applicants to provide "the address where the applicant lives" on the voter registration form and specifically prohibit the use of a post office box.

[24] USPS Coding Accuracy Support System (CASS) program and National Change of Address (NCOA) data can be used to assess the accuracy and reliability of reported mailing addresses as well as an individual's most current mailing address. It should be noted the USPS service flagged approximately 2,150 addresses with 10 or more voter registrations as commercial/business addresses. However, we determined most of these addresses were associated with legitimate residences, such as apartment buildings, nursing homes, mobile home parks, and extended stay hotels.

[25] As noted on page 14, we obtained only the current address and last vote date rather than all instances in which an individual was registered and voted. Consequently, some of these individuals' votes may have been cast when they were registered at another address.

time applicants are required to provide two documents to prove residency, allowed documents, such as "postmarked mail," could list mailing addresses rather than residences.[26] In addition, applicants who are updating or renewing their REAL ID, including those who are changing their address, are not required to provide any document with their residential address other than a signed attestation that "under penalty of law" the individual swears or affirms they are a resident of the state and the information on the application is true and correct.

State voter registration statutes and regulations related to residency documentation are less specific than DDS's. While state law (O.C.G.A. § 21-2-217 (b)) allows county registrars to consider a variety of information in determining the applicants' residence, it does not require any documentation as proof.[27] Mail-in voter registration forms request that applicants supply proof of residence either with their application or when voting for the first time. The content of these forms is prescribed by the federal Help America Vote Act (HAVA), which lists the documents that must be accepted—such as a Georgia driver's license or ID number or the last four digits of a social security number. While these documents do not necessarily confirm that the applicant's address is current or accurate, HAVA prohibits the state from requiring additional documents to prove residency.

While statutory and regulatory requirements for residency documentation are vague, GARViS includes automated controls to limit the entry of invalid addresses. Specifically, GARViS allows the county registrar to identify and designate certain addresses as commercial only. Registrations using these addresses are then marked pending and the applicant is notified of the address issue. However, this control depends on the county registrar to accurately designate commercial addresses.

Criminal Justice Facilities

Under state law, correctional facilities or county jails may not qualify as valid residential addresses for voter registration. As described below, we found nearly 1,000 instances of these addresses on active/inactive registrations. Nearly 40 had a record of voting after their latest registration date; however, it was not possible to determine whether the votes were cast while at the stated residence.

- **Correctional Facilities** – O.C.G.A. § 21-2-216(b) prohibits individuals who have been convicted of a felony from registering, remaining registered, or voting until their sentence is completed. Residents of correctional facilities (e.g., prisons or transitional centers) are likely serving sentences for felony convictions. We identified 863 voter registrations listing a Georgia Department of Corrections (GDC) prison or transitional center as the current

[26] Mortgage statements, lease agreements, utility bills, or vehicle registrations list the residential address, while bank statements or social security statements—which DDS currently accepts—may only list a mailing address.

[27] The only documentation required in state law to accompany voter registrations is proof of identity and citizenship (O.C.G.A. § 21-2-220.1 and § 21-2-216). However, if the applicant affirms that they do not have such proof, the application can still be approved, and the individual will be required to present documentation prior to voting (O.C.G.A. § 21-2-417). Such documentation includes a current utility bill, bank statement, government check, paycheck, or other government document showing the voter's name and address.

residential address (totaling 10 facilities across the state). All were in active/inactive status, and 7 (0.8%) voted after their latest registration date.

More than 98% (849) of these registrations were created through the AVR system. According to DDS staff, Georgia driver's licenses are issued to inmates at transitional centers and to inmates upon release from state prisons. GDC requires the inmates of transitional centers to use the address of their assigned facility for their home address when obtaining these licenses; it does not indicate released inmates should use the prison address. It is likely that these driver's license applications did not include an "opt out" from AVR, and the voter application was submitted to SOS because DDS had not flagged these addresses as ineligible for voter registration.

- **County Jail** – As noted on page 15, O.C.G.A. § 21-2-216 and § 21-1-217 require voters to register with the address associated with their permanent residence. Because individuals are in county jails while awaiting trial, awaiting a transfer to a state prison following conviction, or serving a maximum 12-month sentence for a misdemeanor crime, these addresses would likely not be considered permanent. We identified 102 voter registrations listing the Fulton County jail as the current residential address. All were in active/inactive status and 31 (30%) voted after their latest registration date.

  More than 95% (97) of these registrations were created through paper applications. This address had not been flagged by the county as invalid for voter registration.

Erroneous Addresses

Ensuring the residential address on a voter's registration is real and an identifiable location is necessary to establish that the voter is a resident and assigned to the appropriate voting district. We used USPS data to identify residential addresses with invalid or missing key elements such as street numbers or names.[28]

We identified approximately 3,000 voter registration records with placeholder terms that indicate missing or invalid information (e.g., "Missing Street Address" or "Invalid"). The majority of these records (2,591 or 86%) did not have an assigned precinct and thus cannot receive a ballot or vote. Among the 436 with an assigned precinct, 187 (43%) voted after their registration date. These voters were in counties across the state.

The relatively small number of such address errors can likely be attributed to the system improvements made in GARViS. In the updated version, county registrars are no longer able to type in a street address; rather, they must select from a drop-down menu listing pre-determined street names and segments. The GARRA system, described on pages 31-32, can also retroactively identify errors in registrations created prior to 2023.

[28] USPS data also identified certain addresses with issues such as incorrect street numbers, names, or sub-premise numbers. After examining a sample, we determined that most of these were valid for registration. Therefore, we found the flagged data unreliable for reporting purposes.

It should be noted that GARViS's automatic data entry controls are not used for mailing addresses. If registration-related mail is returned as undeliverable and a voter does not respond to subsequent communications, they will be moved to inactive status and subject to removal. We found approximately 70,000 voter registrations with mailing addresses identified as having errors.[29] While our limited review of these addresses found some appeared valid, we were unable to determine how many are truly "undeliverable."

Commercial Addresses

State law does not explicitly invalidate commercial addresses; however, they do qualify under state law (O.C.G.A. § 21-2-230(b)) as probable cause for voter challenges. Two of the most common types of commercial addresses included in the voter registration list are associated with colleges/universities and homeless shelters, described below. Additional guidance is likely needed to ensure voter registrants—as well as individuals and organizations that may be assisting with registrations—are aware of the requirements related to these addresses.

- **College Addresses** – State law holds college students to the same residency standards for voting as the general population. O.C.G.A. § 21-2-217 specifies that residency can neither be gained nor lost by an individual's presence or absence while enrolled at an institution of higher learning. These voters, therefore, must register to vote using their permanent residential address as defined in statute. This could include a college dormitory or apartment (if the student intends to remain at the address) or the student's family home (all of which represent a specific location of residence).

  We identified approximately 11,500 voter registrations that utilize addresses associated with general college locations or mail rooms, rather than specific residences. These types of addresses may not meet the criteria for establishing a student's domicile. As stated on page 15, post office boxes and private mail services are not considered valid for residency purposes. Furthermore, general college addresses do not specify an actual domicile, such as a dormitory, apartment, or house.[30]

- **Homeless Shelters/Churches** – We identified 72 addresses in 20 counties linked to approximately 10,000 voters registered at homeless shelters, churches, or homeless service organizations. Most of these registrations were created through AVR. Homeless service organizations can assist with obtaining official IDs by providing affidavits that their clients can use the address for identification purposes. In addition, many of these organizations also provide clients with shelter services and therefore may accurately represent where the individual resides.

  O.C.G.A. § 21-2-217 (amended in 2024) requires homeless individuals to use

[29] Errors include addresses not found in USPS files or those with missing or invalid components. Because residential addresses may also be used as mailing addresses, many of these errors were also identified in the residential address analyses previously discussed.
[30] This analysis is limited to determining whether an address indicates a specific domicile, not whether the address is considered a student's permanent address. "Permanency" is dependent on the student's intent, which could not be determined in the analysis.

the county registrar's address as their mailing address when registering to vote if they do not have a permanent address. We identified only 337 registrations using the county registrar's address. Because the requirement had been in effect for less than one year at the time of our review (and homeless individuals may have already had a permanent address where they receive elections mail), many registrations for homeless individuals include different mailing addresses. In addition, voter registrations initiated through DDS/AVR are unlikely to list the county registrar's office as the mailing address. This is because the mailing address on these records is meant for DDS communications, not necessarily voter registration.

Recommendations

1. DDS should revise the list of documents accepted to ensure they are limited only to those that indicate a residential address.
2. SOS should continue its efforts to ensure valid addresses are used for voter registrations, particularly that invalid commercial addresses and other address errors are flagged for correction.
3. SOS and DDS should flag addresses associated with Georgia Department of Corrections facilities and county jails for review as potentially ineligible for voter registration.
4. Clarification should be provided regarding the type of addresses used for college/university students to ensure that the addresses meet statutory residency requirements.
5. SOS or county registrars should develop and provide guidance to homeless service organizations to ensure their clients use the county registrar's office as their mailing address, when required.

SOS Response: *SOS partially agrees with this finding, noting that it "will continue training county election officials on the full capabilities of the Georgia Registered Voter Information System (GARViS), including tools that identify commercial addresses and other address anomalies." SOS also noted it "will continue to utilize the GARRA tool to flag voter records at commercial addresses for county registrars to investigate." Finally, SOS stated that to "the extent further clarification on the permissible types of residential addresses is needed, it should be addressed by the legislature."*

DDS Response: *DDS partially agrees with this finding, noting that the Georgia laws referenced in the finding that relate to acceptable addresses for voter registration "do not pertain to the issuance of credentials, which must follow the REAL ID Act of 2005." DDS also stated it takes its responsibility seriously, acknowledging "that there is difficulty in verifying a person actually lives at a particular address." DDS further stated it is "REAL ID compliant and will continue to attempt to verify all residential addresses."*

Recommendation 2.1: *DDS partially agrees with this recommendation, explaining it is compliant with the REAL ID Act of 2005 and it informs individuals that they are required to provide proof of their residential address. However, DDS notes it is "constantly seeking changes to clarify issuance requirements." Regarding compliance with the REAL ID Act, DDS pointed to being "initially certified by the United States Citizenship and Immigration Services for REAL ID in 2012, recertified in 2018," and pending recertification for 2026.*

Recommendation 2.2: *SOS agrees with this recommendation, stating it "will continue training counties to use all features of GARViS" and will further "continue to utilize the GARRA tool" to flag records for investigation.*

Recommendation 2.3*: DDS agrees with this recommendation, noting that the recommended action has been completed.*

SOS partially agrees with this recommendation, noting that legislative clarification is needed because state law permits absentee ballots to be sent to county jail addresses. SOS also noted it has processes for removing convicted felons from the voter list and preventing them from voting.

> ***Auditor's Response****: Although state law permits absentee ballots to be sent to county jail addresses, it does not specifically address whether county jail addresses can be used to establish residency for voter registration purposes.*

Recommendation 2.4: *SOS disagrees with this recommendation, stating that "state law permits college and university students to be registered at their campus address" and that the issue should be addressed by the legislature if additional clarification is needed.*

> ***Auditor's Response***: *We are not questioning the use of campus addresses for voter registration; however, we do recommend guidance be developed regarding the type of address that is permissible. For example, campus mailrooms do not appear to qualify as a student's residence for voting registration purposes.*

Recommendation 2.5: *SOS partially agrees with this recommendation, stating that while it agrees to make guidance available to organizations at their request, "legislative action is needed to clarify the residential address requirements for homeless voters in the Elections Code."*

Finding 3: Processes are generally effective in preventing non-citizens from registering, but control improvements are needed to further minimize the risk of human error.

State and federal laws require U.S. citizenship to vote, and most voter registrations are verified using DDS REAL ID records. Despite these safeguards, human error resulted in the registration of 2,570 potential non-citizens who are currently or were previously active and able to cast a ballot. These errors resulted in either the

misclassification of citizenship status on REAL IDs or insufficient verification of citizenship by county registrars.

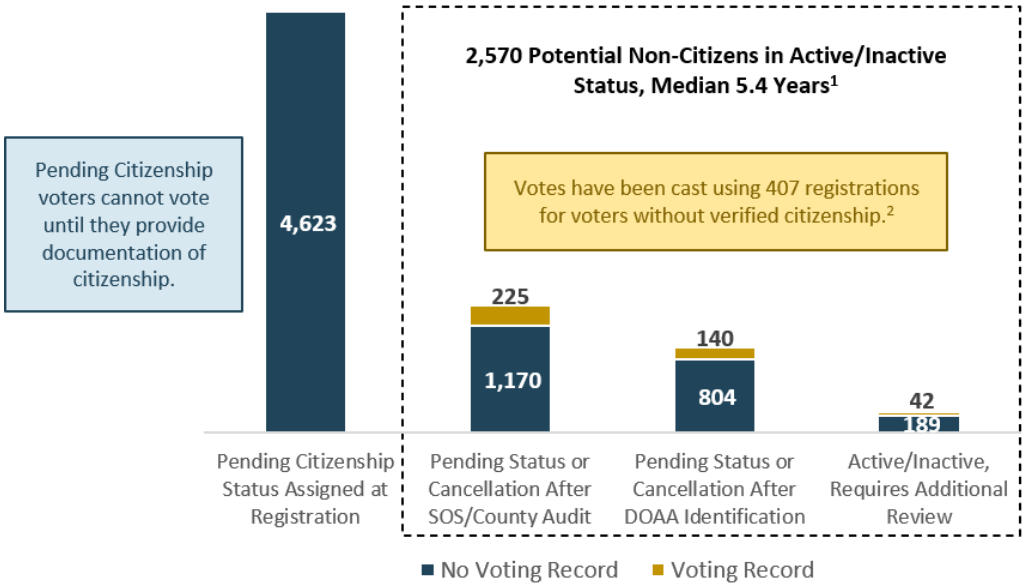
This analysis was conducted after data reliability testing identified questionable citizenship values in DDS records used for the identity analysis in Finding 1.

Federal (18 U.S.C. § 611) and state (O.C.G.A. § 21-2-216) laws require voters to be U.S. citizens to participate in elections. While the federal NVRA prohibits states from requiring documentary proof of eligibility (i.e., citizenship) on paper applications, voter registrations that include a driver's license number undergo these checks to comply with the REAL ID Act requirement. Those that provide evidence of non-citizenship (and lawful presence) to DDS are flagged and placed in pending status; they then must present proof of citizenship to become an active voter. More than 98% of voter registrations include a REAL ID number, as described on page 11.

As shown in **Exhibit 8**, county offices flagged 4,623[31] voter registration applications as requiring proof of citizenship. As a result, the registrations were placed in pending citizenship status, and these individuals have not been able to cast a ballot. However, we identified 2,570 potential non-citizen registrations that were not initially flagged by county offices and were consequently in active status for a median of 5.4 years before action was taken. Of the 2,570 registrations, 407 (16%) have been used to vote. These registrations are described below the exhibit.

Exhibit 8

Approximately 2,600 potential non-citizen registrations were in active or inactive status prior to action (September 2025)



[1] Most (2,339) are now in pending citizenship status or have been canceled; however, the registrations were active/inactive for a median duration of 5.2 years prior to the status change.

[2] The last vote date recorded for these 407 registrations ranged from 1996 to 2025. Consequently, many of these voters may not have voted in the same election.

Sources: Office of the Secretary of State, Georgia Department of Driver Services

[31] *This includes voters registered as of September 24, 2025 (the date the audit team acquired voter registration data).*

- **Identified during SOS or county audits** – Prior to our review, SOS or county offices placed 1,395 previously active registrations in pending citizenship status; 225 had a voting history. Many were placed in pending status as a result of statewide citizenship audits conducted by SOS from 2024 through April 2026. These audits used juror affidavits of non-citizenship, DDS data, and federal SAVE[32] database searches. Updates to the SAVE program in 2025 made it a more effective tool for these audits. In particular, SOS could process large batches of queries, use full or partial social security numbers as unique identifiers, and use the program free of charge.
- **Identified by the audit team** – We identified an additional 1,175 voter registrations in active/inactive status where the latest REAL ID on file with DDS showed they were not U.S. citizens and the SAVE research could not confirm U.S. citizenship. Additionally, there were no indications in GARViS that county offices obtained proof of citizenship. Records show that 182 (15%) of these registrations had a voting history.

  After further review by SOS and county registrars, 944 were placed in pending status or canceled. SOS has not yet been able to confirm the citizenship status of the remaining 231 active/inactive status voters. For these cases, SAVE research was inconclusive or county research had not been completed. According to SOS staff, further research will be conducted.

We identified internal control weaknesses at both DDS and county registrars that contributed to the registration of potential non-citizens. These weaknesses are described below.

REAL ID Control Weaknesses

To identify the potential reasons that non-citizens were registered as active voters, we requested that DDS review records for 359 voter registrations initiated through AVR, despite these individuals' most recent REAL ID documentation indicating non-U.S. citizenship. Based on the AVR process, these individuals should have been automatically blocked from registering through that system.

In all instances, DDS staff erroneously identified the individual as a citizen when they were registering for a driver's license or state identification card (in many cases, these errors occurred after the REAL ID Act, as described in the text box on page 23.) A voter application was then automatically generated, and the county approved registration without further verification because DDS served as confirmation of citizenship. DDS ultimately corrected the citizenship status upon further review of the initial REAL ID application or when the individual renewed their identification. However, there was no mechanism to notify SOS that the non-citizen should be removed from the voter registration list.

[32] *Systematic Alien Verification for Entitlements. This program is managed by the U.S. Citizens and Immigration Services and allows federal, state, and local benefit-granting agencies to verify a person's immigration status when determining eligibility for public benefits, licenses, or other services. Agencies can conduct a search with biographical information and an identifier; SAVE then performs electronic matching across various federal agencies (e.g., Social Security Administration, Department of Homeland Security) and will return with citizenship/immigration status if a match is found.*

It should be noted that most of the other registrations initiated outside AVR (e.g., mail-in, online applications) included a driver's license. As such, they may have also been impacted by DDS's control weaknesses.

Voter Registration Control Weaknesses

County registrars processed and activated at least 395 voter registrations after the issuance of REAL IDs that indicated the applicants were non-citizens. If the related DDS record indicates the applicant is not a citizen, counties are required to obtain proof of citizenship. Applicants should remain in "pending citizenship" status until such proof is received. However, it appears that counties either did not acquire the required documentation or did not adequately verify the information presented.

Internal control weaknesses at DDS impacted the reliability of citizenship status on REAL IDs and applications submitted through AVR

We identified 359 voter registration records initiated through the Automatic Voter Registration (AVR) system even though the latest REAL ID record showed they were in fact not citizens. DDS records initially indicated these individuals had U.S. citizenship status. In some cases, examiners corrected the record prior to issuing the identification; in others, the identification was issued with incorrect citizenship status. Immediately after the misclassification of the applicant as a U.S. citizen, the voter registration application was automatically submitted to SOS (52 of these individuals have a voting history). We were able to identify these voter registrations because DDS either corrected the record before an ID was issued or corrected citizenship status later at ID renewal. There was not a mechanism in place for DDS to notify SOS about these changes for voter registration updates.

Individuals were initially incorrectly granted citizenship status on their Georgia identification typically because examiners misclassified documents or failed to obtain necessary documents. In particular, employment authorization cards (or other documents) were miscategorized as U.S. birth certificates. DDS stated this can occur because birth certificates are only visually inspected versus validated against an external data source. By contrast, other documents that would verify citizenship—such as U.S. passports or naturalization certificates—are verified with their respective agencies. Some birth certificates can be validated through systems such as Georgia Vital Records (limited to Georgia births) or the Electronic Verification of Vital Events (EVVE) system, which is used by other states' driver services programs. DDS staff cited high costs and questionable effectiveness as barriers to EVVE adoption.

DDS has opened investigations and taken personnel actions as a result of this review and our recommendations. It has also implemented procedures to resolve the issue that resulted in the submission of voter registration applications prior to REAL ID approval. To identify additional REAL IDs that were inaccurately categorized but had not yet been corrected, DDS queried all active driver's licenses (approximately 9 million) against the SAVE database and reviewed identity documents recorded in its system. DDS's review found an additional 3,285 Real IDs may have been issued with incorrect citizenship status. DDS requested these individuals provide proof of identity and citizenship by May 15, 2026, to update or retain their REAL ID. After this action, DDS reported that it was able to verify U.S. citizenship for 750 individuals and lawful presence for 678 (these IDs were reissued with the correct non-U.S. citizenship status) and canceled the remaining 1,857 IDs it was unable to verify. DDS also reported that this information was provided to SOS.

Recommendations

1. DDS should identify, retract, and correct REAL IDs that have been incorrectly issued. DDS should forward to SOS information regarding any IDs associated with a loss in citizenship status to ensure voter registration action.

2. DDS should implement a process to ensure that examiners accurately identify, categorize, and verify identity and citizenship documentation. This process could include adopting the use of the Electronic Verification of Vital Events system to assist in the verification of birth certificates.
3. DDS should ensure it has resolved the issue that resulted in the submission of voter registration applications prior to issuance of a REAL ID.
4. SOS should establish a collaborative process with DDS to periodically identify voter records in cases where the most recent REAL ID reflects non-citizen status and verify that county registrars have obtained appropriate documentation confirming citizenship.
5. SOS should forward to DDS information regarding non-citizens identified through their audits of voter registration records that include a REAL ID number.

SOS Response: *SOS agrees with this finding, stating "it is the priority of SOS to ensure that only U.S. citizens are registered to vote in Georgia as required by state and federal law." Furthermore, "SOS has conducted multiple full citizenship audits of the voter list in 2024 and 2026" and utilized SAVE to verify citizenship for all applicants who do not provide citizenship documentation. SOS also noted that the Department of Homeland Security recognized SOS as a national leader in doing so. When SOS identifies potential non-citizens, they are placed in "Pending Citizenship" status and will not be permitted to vote unless documentation of citizenship is provided. Finally, SOS noted it implemented controls to verify citizenship at the time of registration, prevent non-citizens from being able to vote, and remove any detected non-citizens from the active voter list.*

DDS Response: *DDS partially agrees with this finding, acknowledging that "while systems and controls were already in place, there were some weaknesses. DDS has strengthened and implemented additional controls to address this, such as issuance training and progressive disciplinary measures that have resulted in terminations."*

Recommendation 3.1: *DDS agrees with this recommendation, noting it has already been addressed and resolved. DDS further explained that from "February through May 2026, DDS conducted a Quality Assurance Review of all active records (over 9 million). As a result, DDS identified 3,285 records requiring additional information. Of those records, 1,428 submitted documentation to verify citizenship status or lawful presence. The remaining 1,857 credentials could not be verified and were canceled. To date, there are no unverified or unmatched records. This information has been shared with the SOS's office for reconciliation." Moreover, DDS has and "will continue to work with SOS to establish a procedure to periodically identify voter records in cases where the most recent REAL ID reflected non-citizen status."*

Recommendation 3.2 *DDS agrees with this recommendation, noting that*

rather than using EVVE to address this recommendation, it is now requiring a secondary verification of all transactions involving birth certificates. DDS stated it will consider using EVVE or other similar solutions if funding is available. However, DDS explained that the lack of jurisdictional standards for birth certificate issuance and the fact that not all states participate in EVVE impacts verification. DDS stated it will continue to use third party verifications such as SSOLV, SAVE, and USPVS to verify social security numbers, immigration documents, and U.S. passports.

DDS also noted it has "executed disciplinary measures to emphasize the importance of the verification process. If an examiner fails to follow issuance procedures, the examiner is subject to disciplinary action, leading up to and including termination." Finally, DDS noted the Quality Assurance Review it conducted resolved the issue of records with incorrect or unverified citizenship status.

Recommendation 3.3: *DDS agrees with this recommendation, noting "the issue was the result of human error" and that "the problem has been resolved through a reconciliation process between SOS and DDS."*

Recommendation 3.4: *SOS agrees with this recommendation, stating it is collaborating with DDS to create a reconciliation process.*

Recommendation 3.5: *SOS agrees with this recommendation, stating if it identifies non-citizen records that include a driver's license number, staff will forward this information to DDS. DDS stated it "will continue to work with SOS when investigating the accuracy of information provided regarding citizenship."*

Finding 4: Election officials regularly use required third-party information for timely list maintenance, but challenges exist.

State and county election officials use third-party information to maintain voter lists, consistent with statutory requirements and best practices. Our review also found that changes to voter records are typically processed promptly. However, challenges arise when utilizing third-party information because it depends on external entities and data that may lack the necessary detail to accurately match voter records.

A dashboard providing information on each county's processes can be found on our website at DOAA Voter List Maintenance Dashboard.

Georgia law and federal requirements establish expectations for list maintenance (i.e., updating or canceling existing voter registrations). Federal law establishes minimum requirements that include utilizing state records on felonies and deaths. State law requires SOS to obtain information from third parties, including justice agencies, courts, and vital records offices. This information is used to identify voters who may have become ineligible due to felony convictions, death, mental incapacity, or changes in residency. SOS uses the information in its statewide list maintenance processes and shares the information with counties, which are responsible for updating voter records. The number of voters removed from rolls during the 2022-2024 federal election cycle can be found in **Exhibit 6** on page 10.

To assess compliance with statute, we interviewed state and county officials, reviewed relevant documents, analyzed a sample of transactions, and surveyed Georgia's 159 counties (148 or 93%, responded).[33] Information on each county can be found on our website at DOAA Voter List Maintenance Dashboard.

State and county officials generally adhered to requirements (see **Appendix C**), though there may have been gaps in court reporting. Despite general adherence, challenges still exist when utilizing third-party information (see text box on page 27 for further discussion).

Secretary of State

SOS has relevant list maintenance processes that generally align with legal requirements but are not documented in formal policies and procedures, as discussed in Finding 6. We assessed SOS's list maintenance processes based on interviews and a review of various agency documents.

Information Sources

As required by law, SOS obtains information from multiple sources. However, reporting practices vary.

- **Felony Convictions** – SOS reported it receives felony conviction data monthly from the Georgia Crime Information Center and the Departments of Corrections and Community Supervision. The U.S. Attorney's Office also submits information as needed. These processes align with state law (O.C.G.A. § 21-2-231) and federal requirements under NVRA and HAVA. SOS does not routinely obtain criminal data from other states (as permitted under O.C.G.A. § 21-2-231), though it may use such data if provided.
- **Death** – SOS obtains vital records from the Department of Public Health weekly and from the Social Security Death Master File via Electronic Registration Information Center (ERIC) approximately every 60 days. (ERIC uses data matching technology to improve voter registration data accuracy and is cited as a useful resource in the U.S. Election Assistance Commission's best practices.) These processes comply with state law (O.C.G.A. §§ 21-2-231 and 21-2-232) and HAVA.
- **Address Changes** – As required by state law (O.C.G.A. §§ 21-2-221, 21-2-232, and 21-2-233), SOS obtains address information through USPS National Change of Address (NCOA) data, ERIC, and DDS. SOS has also coordinated state-to-state exchanges with several other states (Alabama, Florida, South Carolina, and Virginia) in accordance with best practices.

[33] *County responses outlined in Findings 4-7 are reported as a percentage of total respondents. Two counties are included as respondents in these findings but are excluded from the online dashboard at their request.*

Challenges to list maintenance persist despite adherence to laws and best practices

As discussed below, the decentralized nature of list maintenance activities and data limitations create ongoing challenges to accurate and reliable list maintenance. Given this environment, it is not possible to eliminate all associated risks even when controls are implemented and recommended actions are performed.

- **Decentralized process – List maintenance depends on information being submitted by numerous entities beyond SOS's oversight authority, including courts and other states. Once SOS receives the information and transmits it to the counties, decisions to update records or remove voters rely on the judgment of staff across 159 counties that vary significantly in staffing levels and experience.**
- **Limitations of third-party data – Third-party data sources are not designed for election administration and may lack necessary information to confirm a match with voter records. For example, although the NCOA is one of the most commonly utilized sources, the following challenges exist:**
  - **Not all movers submit a change-of-address request.**
  - **Change-of-address requests do not include birth dates or social security numbers, making it challenging to match records to a voter. Furthermore, individuals can file one change-of-address request for an entire household, so linking this change to each voter can be difficult.**
  - **Some voters who file a change-of-address request do not intend to update their voter registration (e.g., people re-directing mail while they travel for an extended period).**
  - **NCOA reviews result in notices asking voters to confirm whether they still reside at their registered address or have moved. Ideally, voters respond and records are updated as needed; however, nearly 70% of notices nationwide receive no response, according to an Election Assistance Commission survey.**
- **Dependence on accurate registration data – Initial registrations that contain inaccurate data (e.g., typos) or missing information (e.g., social security numbers) impact the effectiveness of list maintenance processes that rely on data matching.**

- **Non-citizens and mentally incompetent** – Under O.C.G.A. § 21-2-231, superior and probate courts are required to report monthly to SOS individuals who self-identify as non-citizens during juror qualification and those declared mentally incompetent. SOS indicated 35 superior and 121 probate courts have "regularly" reported. Non-reporting courts may have had no cases to report, may have reported directly to the county, or may not have reported at all. Interviews with court staff revealed inconsistent practices and limited awareness of reporting requirements. In November 2025, SOS created court reporting instructions and a form requiring courts to either list individuals identified as non-citizens or check a box that there are no individuals to report; SOS also indicated that reporting is being monitored monthly and a similar process will be established for probate courts.

Processing Updates

SOS uses third-party data to perform statewide list maintenance and transmits other updates to counties for action. SOS actions described below occur at frequencies consistent with statute, which can ultimately lead to removal from the voter registration list if responses are not received. SOS's procedures to identify, notify, and cancel

inactive voters do not conflict with the state and federal requirements to complete these list maintenance activities no later than 90 days prior to a federal election.

"No-contact" registrants have not voted or had other contact (e.g., updated registration, signed a petition, requested absentee ballot, etc.) within the preceding five years.

- **Change of Address** – According to O.C.G.A. §§ 21-2-232 and 21-2-233, voters with an identified change of address shall be mailed a confirmation notice. The voter must have at least 30 days to respond in writing or they become inactive but remain eligible to vote.[34]

  Based on interviews, we determined SOS's processes to notify voters are consistent with law. Between 2021 and 2025, SOS reported mailing 2.2 million address confirmation notices.

- **No Contact** – To identify no-contact voters, O.C.G.A. § 21-2-234 requires that—within the first six months of each odd-numbered year—SOS review the voter list for voters who have had no contact in the preceding five calendar years and mail them a confirmation notice. Those who fail to respond after 30 days become inactive.

  Based on interviews, we determined SOS's processes to identify and notify no-contact voters are consistent with law.[35] In 2021, 2023, and 2025, SOS reported mailing nearly 590,000 notices.

- **Inactive Voters** – To identify and cancel inactive voters' registrations, the NVRA and O.C.G.A. § 21-2-235 require that a notice must be mailed to inactive voters no sooner than the day after the second November general election following a designation of inactivity. This occurs no less than 30 days and no more than 60 days prior to cancellation.

  Based on interviews, we determined SOS's processes to identify, notify, and cancel inactive voters are consistent with law. SOS reported multiple staff (including a data analyst) vet the list of inactive voters by reviewing for clerical or system errors pertaining to dates of last contact, last ballot cast, and registration; staff further compare the current inactive voter list with the inactive voter lists from the two preceding federal November elections. Between 2021 and 2025, SOS reported mailing nearly 790,000 inactive voter cancellation notices; once canceled, individuals must re-register to vote.

Counties

County election offices are responsible for daily list maintenance. Counties differ in the information sources utilized but typically process updates in a timely manner.

County responses are reported as a percentage of total respondents (148 counties).

Information Sources

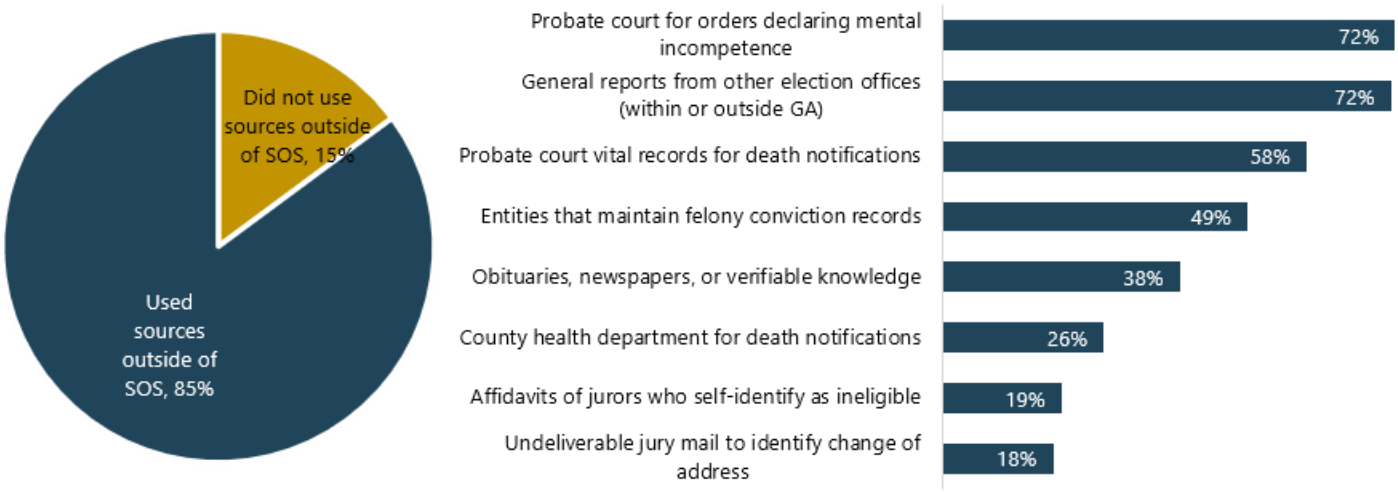
All counties receive data from SOS, and 85% reported they supplement this with at least one third-party source (see **Exhibit 9**). Counties that use third-party sources most commonly reported receiving mental incompetence orders directly from probate courts or reports from other election offices within or outside Georgia. In

[34] *If NCOA shows a within-county move for which no response is required, no designation of inactivity will occur.*
[35] *It should be noted that this process relies on the voter's recorded date of last contact; we identified errors in this field for approximately 20,000 of the 8 million (0.25%) voter records reviewed (see Finding 5).*

contrast, fewer counties reported receiving information from county health departments or jury divisions. It should be noted several counties we surveyed indicated they do not find third-party resources necessary because all counties receive voter eligibility information from SOS. Others noted a lack of policies and procedures for using third-party sources or lack of access to third parties.

Exhibit 9

Counties often reported use of third-party sources



Source: DOAA survey

In addition to the sources shown above, counties may also become informed of changes to voter information through voter challenges, which are authorized under state law (O.C.G.A. §§ 21-2-229 and 21-2-230). Specific procedures can vary, but the county is responsible for notifying parties, conducting hearings, and updating records as needed.

Processing Updates

HAVA requires updates to be processed "expeditiously" once voter information is received. Additionally, O.C.G.A. § 21-2-231 requires counties to initiate appropriate action within 60 days of receiving information impacting voter eligibility.

Nearly all counties surveyed indicated that voter record updates typically occur within 15 business days and that action is always initiated within 60 days of receiving voter eligibility information, with few exceptions.[36] We analyzed a sample of voter record updates[37] and found that estimated processing times generally aligned with the survey responses.

It should also be noted that federal election deadlines for new registrations must

[36] *Counties noted that updates, such as processing information on felons or deaths, can be longer during election windows. Additionally, voter cancellations can be delayed if information is inconclusive or insufficient.*

[37] *We reviewed all recorded transactions from March and May of 2024 and January and August of 2025.*

occur no more than 30 days prior to the election. To prevent backlogs from occurring during this period, counties can continue to process applications after a registration deadline and flag them in GARViS so they do not take effect until after the election window. However, counties we interviewed expressed concern with the reliability of this feature. SOS indicated that the GARViS workflow issues were resolved during the course of this audit and that training was provided to the counties in March 2026.

Recommendation

1. To ensure compliance with state law, SOS should continue reviewing its records for county courts that have failed to report. As necessary, SOS should verify whether there has been a lapse in reporting.

SOS Response: *SOS partially agrees and stated that while staff have established reporting procedures, forms, and instructions for courts to timely report voter information, "state law places the legal duty to report on the courts, and it is their responsibility to comply with these requirements."*

Finding 5: Election officials reported using various quality control reviews, but procedures could be strengthened to improve accuracy.

Consistent with laws and best practices, state and county election officials reported conducting quality control reviews, although procedures vary by county. Additional quality control procedures accompanied by formal state guidance may help detect or prevent data entry errors that we identified, which impact the reliability of statewide list maintenance processes.

According to the U.S. Election Assistance Commission's best practices, election officials should establish written quality control procedures. Quality control reviews should include routine system-wide reviews of the voter registration database and near real-time reviews of changes to voter records (i.e., transactions). System-wide reviews can include procedures to identify invalid voter addresses, outdated voter information, overall trends, and duplicate records. Duplicate records must also be eliminated pursuant to the Help America Vote Act of 2002. Finally, reviews of each change to a voter record can help detect errors, such as typos or changes made to the wrong voter record.

To assess the extent to which state and county election officials conduct quality control reviews, we interviewed and surveyed state and county election officials—148 of 159 counties (93%) responded. All officials reported quality control procedures, which vary by county. However, control weaknesses and data errors we identified (see Findings 1-3) may be remedied with additional quality control procedures.

Secretary of State

SOS reported it conducts system-wide reviews for identifying potential non-citizens and when initiating statewide mailings. SOS also flags records for counties to review.

- **Citizenship** – SOS reported it has conducted three citizenship reviews since 2021. Staff stated they identified potential non-citizens by reviewing juror affidavits from self-identified non-citizens and using the Department of Homeland Security's Systematic Alien Verification for Entitlements. Voter registrations for approximately 1,400 voters were placed in "pending citizenship status" or canceled following these and other county reviews. All of these records were active at some point, and votes had been cast for 225 (16%). According to SOS, these individuals were sent a letter informing them of the status change and the need to provide proof of citizenship to regain "active" status. SOS staff stated these individuals have also been reported to relevant district attorney offices as having potentially unlawfully registered to vote.

  As discussed in Finding 3, we identified 1,175 potential non-citizens registered and in active or inactive status at the time of our review. Most (80% or 944) have been placed in pending status or canceled; no action has been taken for the remaining 231 because further investigation is required.

- **Inactive Voters** – As discussed on page 28, SOS identifies no-contact voters who may become inactive during odd-numbered years. During the identification process, SOS indicated staff compare the recorded date of last contact with multiple other recorded dates (e.g., registration date, last vote date) to ensure none of the dates occurred within the preceding five calendar years.

  Our review of the 8.0 million voter registration records found approximately 20,000 records (0.25%) with illogical dates of last contact (e.g., prior to last vote date, future date). We reviewed a sample of 60 records and found these changes are usually due to human error or system errors that coded dates incorrectly. While SOS indicated that there have been some system improvements, current controls do not prevent or identify all of these errors.[38]

  Dates improperly coded prior to the registration date or last vote date could result in a no-contact identification despite recent contact. (It should be noted that SOS indicated staff also look at the date of last status change prior to cancellation, which should protect against improper cancellations even if there is an error in the date of last contact.) Alternatively, future dates could prevent identifying voters who meet the no-contact criteria. While SOS processes may identify some of these records,[39] conducting periodic, system-wide reviews for illogical dates can help identify and resolve errors shortly after they occur.

- **Database Reviews** – In December 2025, SOS launched the Georgia

[38] *Dates may be updated during normal business processes or if identified and corrected during record review.*

[39] *Current SOS processes do not include a review to identify errant dates of last contact, specifically those that are in the future or prior to the last vote date. SOS staff indicated other dates used during the identification process serve to minimize risks.*

Registration Review Application (GARRA), which is programmed to weekly flag records that may need additional review.[40] GARRA flags voters aged 104 years and older or born before 1900, and it compares the date of birth to the registration date and date of last contact. GARRA also checks for addresses that are missing, invalid, business locations, vacant, post office boxes, or that have 10 or more registered voters.

Furthermore, SOS utilizes system-wide matching criteria to identify duplicate records nightly. SOS also obtains duplicate records matched in other states' data from ERIC approximately every 60 days. While SOS data indicates duplicates are regularly eliminated, we identified 1,210 individuals with more than one voter registration in active or inactive status. Many of these records contained identifiers flagged by SOS (i.e., duplicate driver's license number, duplicate social security number), which counties may have reviewed. However, SOS noted any duplicate pairs that are erroneously cleared by the county registrar will not be presented again for future review. Most of these registrations (955 or 79%) had both records designated as active, and we found three cases where both duplicate records were used to vote in the same election.

Counties

Counties are responsible for reviewing and resolving records that SOS flags. All counties surveyed also reported additional internal quality control procedures, which vary by county (see **Exhibit 10**). These include database reviews, transaction reviews, and address reviews (described below the exhibit). However, as discussed on page 37, there is limited written guidance on quality control procedures for list maintenance.

- **Database Reviews** – Best practices recommend that election officials conduct "regular" reviews of macro-level data, including reviewing for potential duplicate record matches requiring elimination and for voters coded as more than 100 years old due to data errors.

  In addition to the SOS duplicate reviews, 134 counties (91%) reported routine reviews for duplicates (e.g., daily, monthly). Most counties (95 or 64%) also reported conducting internal reviews of voter dates of birth.

- **Transaction Reviews** – Best practices recommend that election officials conduct near real-time reviews of voter record transactions, preferably as soon as possible after processing. Ideally, a second staff member reviews the source document and compares it to the data entered. Additionally, it is useful to spot check transactions to understand the anticipated volume of transactions and detect abnormalities. GARViS-generated audit reports can assist with transaction reviews.

  Approximately half of counties (82 or 55%) reported that a second staff member reviews source documents, and half (74) review volume trends. Most

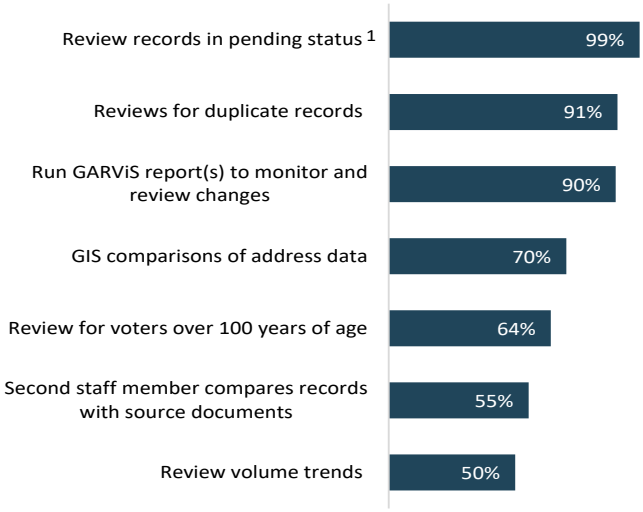
[40] *We obtained voter registration data before GARRA went into effect. GARRA may detect and minimize occurrences of the errors we discuss throughout the report.*

counties (133 or 90%) indicated they use GARViS reports to review changes, but only 41% (60) reported doing this soon after processing (i.e., weekly or daily). Eleven counties (7%) reported performing none of the stated transaction reviews; these counties were mostly rural with voting populations of less than 30,000.

County responses are reported as a percentage of total respondents (148 counties).

Exhibit 10

All counties reported internal quality control procedures of varying types



[1] Records in pending status are typically under review due to missing or incorrect information.

Source: DOAA survey

- **Address Reviews** – Best practices note that "regular" comparison checks of address data can increase data quality, including ensuring voters are correctly assigned precincts. A Geographic Information System (GIS) is an option for regular comparison checks, and additional validation steps can be taken when errors are identified.

  Most counties (104 or 70%) reported incorporating GIS. Counties that do not use GIS primarily indicated it is due to lack of access or training. Moreover, most counties (147) reported taking additional steps when an address is determined to be invalid, which typically includes correcting standardization issues (e.g., typos), contacting the voter for additional information, and reviewing guidance on standard street formatting (e.g., RD versus road). As discussed in Finding 2, we identified nearly 6,800 records with addresses that may be insufficient to establish a voter's residence (e.g., placeholder or commercial address).

- **Other Reviews** – Counties also reported quality control procedures in addition to those identified as best practices. Nearly all counties surveyed (147) reported reviewing records that have been pending for an extended period.[41] Additionally, in Spring 2025 SOS introduced a Not Eligible Georgian

[41] SOS places non-citizens that were found to have been registered voters into "pending citizenship status" until proof of citizenship is provided.

module in GARViS to detect and flag when a potentially non-eligible person (i.e., non-citizen, mentally incompetent) registers to vote. SOS indicated it prefers counties to use this feature, but only 22% (32) reported doing so.

Recommendations

1. SOS should strengthen controls to prevent and detect duplicate records. For example, SOS could have a process to periodically review duplicate pairs that were cleared by the county registrars to ensure none were cleared in error.
2. SOS should strengthen controls to prevent improper coding for dates of last contact. SOS should also establish periodic, system-wide reviews using GARRA to detect illogical dates of last contact, including future dates and dates prior to the last vote date.
3. To help establish uniform quality control reviews, SOS should create written quality control policies and procedures for the counties. Policies should encourage preventing duplicates, conducting transaction reviews shortly after processing, and using GARViS features that improve quality control (e.g., audit reports, Not Eligible Georgian).
4. SOS should strengthen monitoring activities to ensure that counties follow quality control procedures and appropriately resolve errors, including duplicates and issues flagged by GARRA.

SOS Response: *SOS disagrees with this finding. SOS stated it has "implemented controls in GARViS that are effective in preventing and detecting potential errors and duplicate records." Additionally, SOS stated it monitors county registrars' activity in GARViS daily to ensure that they are completing updates in a timely manner. Finally, SOS notes "it is the legal duty of the county registrars to correctly process registrations and maintain accurate voter records."*

Recommendation 5.1: *SOS disagrees and stated it has implemented controls in GARViS that are "effective in preventing and detecting duplicate records." While SOS stated it will continue monitoring activity in GARViS as staff currently do, "it is the legal duty of the county registrars to correctly process duplicate records."*

Recommendation 5.2: *SOS partially agrees and stated that staff will explore whether the recommended controls can be implemented without creating other issues or preventing county registrars from being able to update records as needed.*

Recommendation 5.3: *SOS disagrees and stated that staff currently provide frequent training and technical assistance for county registrars and will provide a guidance document on best practices as well. SOS further stated that "policies and procedures are best developed at the county level because county registrars have the legal responsibility for voter registration."*

Recommendation 5.4: *SOS disagrees and stated it has implemented controls in GARViS that are "effective in preventing and detecting errors in voter records." While SOS stated it will continue monitoring activity in GARViS as staff currently do, "it is the legal duty of the county registrars" to appropriately resolve errors. SOS has also requested the legislature provide additional resources to further strengthen monitoring activities.*

Finding 6: County election officials generally reported sufficient staffing and participation in relevant training, but SOS has requested additional staff. Additionally, written guidance is limited.

While county election officials generally reported staffing is sufficient for year-round and peak list maintenance processing periods, state officials noted a desire for additional staff. County officials also largely reported that staff recently attended training on federal and state voter registration and list maintenance topics, in accordance with best practices. However, SOS and most counties lack written policies and procedures for list maintenance.

According to the U.S. Election Assistance Commission's best practices, investing in resources and technology to ensure a strong voter list maintenance program is essential for the program's success. To do this, officials should identify staff resource needs, and staff should be aware of applicable laws that may change, which requires ongoing monitoring and training. Additionally, adequate training and written procedures for database processing are useful to ensure accuracy and uniformity.

To assess adherence to best practices regarding staffing sufficiency and training, we interviewed and surveyed state and county officials—148 of 159 counties (93%) responded. To determine the prevalence of written guidance, we requested the policies and procedures related to list maintenance from all counties and received documents from 27 counties. Results are discussed below.

Elections Staffing

To ensure adequate resources, best practices recommend that election officials identify year-round and peak processing staffing needs, including the allocation of staff to perform timely quality control reviews and database changes. SOS and county officials explained that peak processing periods typically occur during elections and statewide general mailings. To identify staffing needs, officials indicated they consider the size of elections based on prior history. As described below, state and county officials described staffing as generally adequate.

- **State-level staffing** – The SOS Elections Division has 18 staff, as well as employees within IT and legal divisions who are regularly involved with voter registration and list maintenance processes (e.g., system administration for GARViS, information sharing with the counties). Additional SOS staff are also involved with these processes during peak periods; for example, mailroom

staff assist with general mailings and investigators visit polling locations on election days.

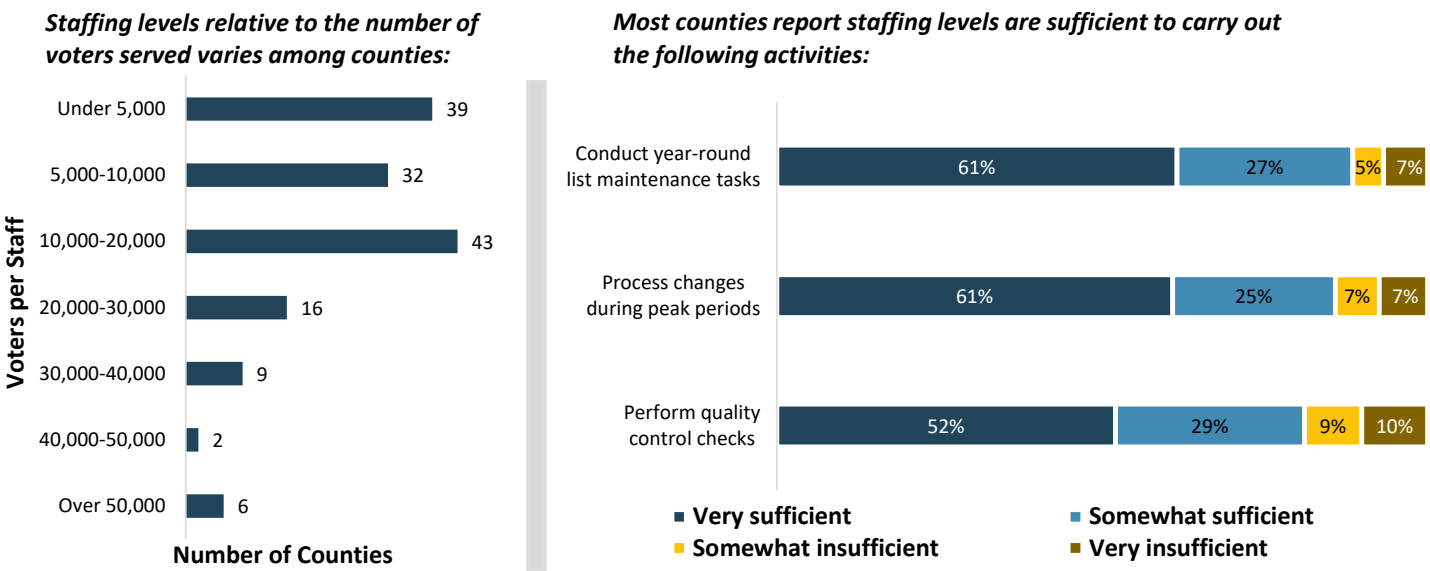
While SOS indicated staffing is sufficient for carrying out statutorily required duties, management noted a desire for additional in-house auditors to better monitor county processing. SOS Elections indicated it requested 23 additional positions (9 of which were for auditor roles) in fiscal year 2025 and received 5, including 2 auditors.

- **County-level staffing** – Counties generally reported 1-25 staff positions assigned to daily voter registration and list maintenance activities, with most counties ranging from 1 to 4. However, county voting staff serve varying voter populations. Of the 148 survey respondents, 72 counties reported 10,000 or fewer voters per staff member, while six metro Atlanta counties reported more than 50,000 voters for every staff member (see **Exhibit 11**). Few respondents (25%) reported using seasonal or temporary staff, and usage was primarily reported by urban counties (57%) for both year-round and peak processing.

  Overall, respondents reported general satisfaction with staffing levels in both urban and rural counties. Counties that reported inadequate staffing typically cited funding as a constraint.

Exhibit 11

Staffing levels vary but most counties report that staffing is sufficient[1]



[1] County staffing levels represent the number of staff assigned to daily voter registration and list maintenance activities and may not include all county election staff (e.g., poll workers, absentee ballot clerks).

Sources: DOAA survey and SOS data

Election Staff Training

Best practices recommend that staff leading voter list maintenance activities understand federal and state voter list maintenance responsibilities, including federal and state laws. Further, best practices recommend continuous monitoring of federal

and state laws for changes, as well as continuous list maintenance training for staff. For counties, O.C.G.A. §§ 21-2-100 and 21-2-101 require election superintendents and board members (or a designee) to attend at least 12 hours of training annually and obtain the Georgia Election and Registrar Official Certification (GEROC).

The method used to ensure staff training varies at the state and county levels, as described below.

- **State-level training** – SOS provides internal training to its employees and hosts webinars for the counties. The webinars include topics such as changes to GARViS, legal changes, and election best practices. SOS also disseminates written guidance (discussed below).
- **County-level training** – Most counties (139 or 94%) reported staff attended training in the past year for state and/or federal voter registration and list maintenance laws, in accordance with best practices. Additionally, SOS maintains training logs that show all counties have at least one staff member who has obtained the GEROC and attended the 2025 Georgia Association of Voter Registration and Election Officials conference, which hosts general election administration seminars (e.g., poll pad reporting, voter outreach, legislative updates).[42]

County responses are reported as a percentage of total respondents (148 counties).

Voter Roll Guidance Documents

To help ensure consistent database processing, best practices recommend election officials maintain written procedures, which may include checklists or flow charts. SOS guidance is limited to outdated GARViS user manuals and PowerPoint slides from training events that cover various processes. Most counties do not maintain internal guidance documents but can access SOS documents from an online portal.

- **SOS guidance documents** – SOS does not have formal policies and procedures for list maintenance but does maintain training PowerPoint slides and a GARViS user manual that county staff can utilize. Training slides cover topics such as reviewing pending records and preventing duplicate records, but they are not clearly organized or comprehensive. For example, training slides do not clearly communicate how to process potential felony conviction records sent by entities outside SOS or provide detailed instructions on quality control activities. Additionally, the GARViS user manual that was created when the initial system launched in 2023 is now outdated, but the vendor is expected to update the manual prior to the project closeout.
- **County guidance documents** – Of the 159 Georgia counties, 27[43] (17%) reported developing internal written guidance, but the format and scope vary widely. Sixteen (16) of these 27 counties have developed standard operating procedures. However, one county only had flow charts, five counties only had

[42] All but 20 counties had at least one person who completed 12 or more training hours. Staff from the 20 counties that did not complete 12 hours at the conference may have obtained additional training, but this was not verified.
[43] Of the remaining 132 counties, 104 (65%) indicated staff solely rely on SOS written guidance and 28 counties (18%) did not indicate whether county-level documents had been created.

policies on a limited number of topics (e.g., voter registration intake, voter challenges), and five counties did not provide current guidance specific to either voter registration or list maintenance.

Recommendation

1. SOS should develop formal policies and procedures on elector list maintenance topics and make them available to counties.

SOS Response: *SOS disagrees and stated that staff currently provide frequent training and technical assistance for county registrars and will provide a guidance document on best practices as well. SOS noted that counties have established their own processes for list maintenance based upon the county's size and available resources. SOS further stated that "policies and procedures are best developed at the county level because county registrars have the legal responsibility for voter registration."*

Finding 7: State and county officials reported various public engagement strategies related to list maintenance.

According to best practices, election officials can use various public engagement strategies to obtain up-to-date information directly from voters, which helps ensure a current and accurate database. State and county officials report conducting public engagement activities, but specific strategies vary across counties.

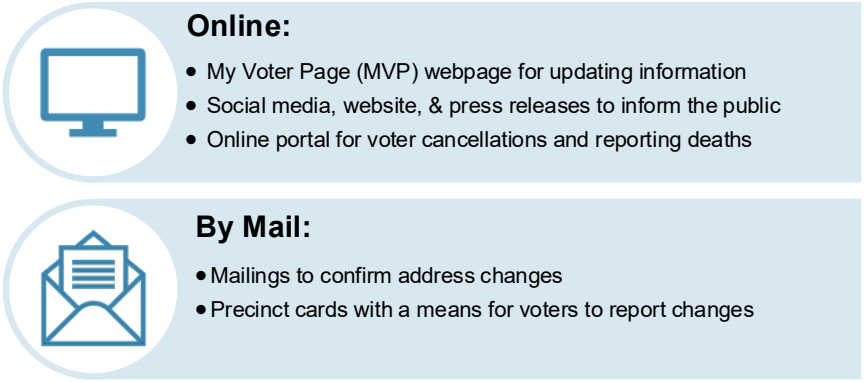
The U.S. Election Assistance Commission's best practices recommend that election officials reach out to the public to obtain information from voters (e.g., moves, deaths). This includes the use of social media, press releases, and media engagements to remind voters to update registration information or to highlight voter list maintenance activities. Additionally, elections websites can be used to describe list maintenance processes, explain various notifications, and provide guidance on specific scenarios, such as name or address changes and family deaths.

The extent to which SOS and counties conduct public engagement activities to support list maintenance activities is described below.

Secretary of State

As shown in **Exhibit 12**, the SOS Elections Division conducts public engagement in a manner that is generally consistent with best practices.

Exhibit 12
SOS uses webpages and mailings for list maintenance



Source: DOAA review of SOS documents and websites

- **Online** – The SOS My Voter Page (MVP) is a webpage for voters to review and update their information, which is transmitted in real time to local election officials for review and approval. SOS social media accounts, website, press releases, and other media sources are used to inform the public about the MVP, particularly when SOS is conducting its statewide list maintenance activities. Additionally, SOS operates a portal that allows voters to cancel their own registration; the portal can also be used to report a voter's death.
- **By Mail** – As discussed in Finding 4, SOS conducts statewide list maintenance annually, which involves mailing notices to voters who appear to have moved or have failed to vote in multiple elections. These notices are sent in prepaid, pre-addressed envelopes, which voters can use to update their information in writing (notices also direct voters to the MVP). Alternatively, precinct cards are formatted to allow voters to report a change of address by mail using the space on the card.

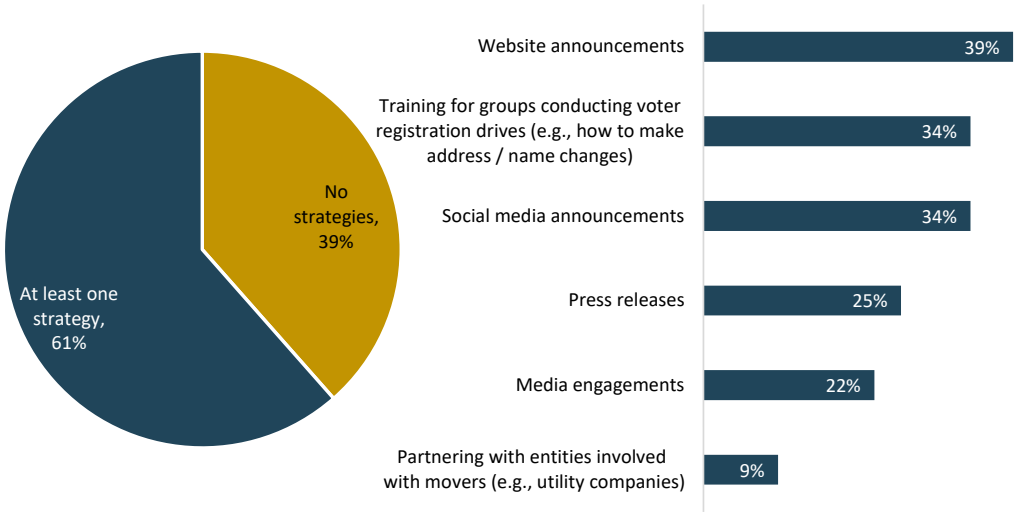
Counties

County responses are reported as a percentage of total respondents (148 counties).

Counties that responded to our survey reported several public engagement strategies, though they varied. Overall, 91 of 148 county respondents (61%) reported using at least one public engagement strategy. Rural counties were less likely to report using public engagement strategies—46% reported no strategies. By contrast, the majority of urban counties (84%) reported at least one.

As shown in **Exhibit 13**, counties commonly reported using websites (58 or 39%) and social media (50 or 34%) to inform the public about list maintenance. Additionally, 50 counties (34%) reported that voter registration groups are trained to inform the public on how to keep their information up to date, which is consistent with best practices. While also a recommended best practice, only 14 counties (9%) reported using community partnerships with entities involved with movers (e.g., utility companies, colleges) to keep voter information up to date.

Exhibit 13
While most counties report using public engagement, strategies vary



Source: DOAA survey

We reviewed 43 county websites and found that most did not describe list maintenance processes, explain notifications, or provide guidance for specific scenarios (e.g., family member death). However, most (36) of the websites provided some useful information, such as links to the MVP website and/or voter cancellation portal. The remaining seven counties did not provide any information relevant to voter list maintenance.

SOS Response: *SOS agrees with this finding.*

Appendix A: Table of Findings and Recommendations

	Agree, Partial Agree, Disagree	Implementation Date
Finding 1: Nearly all voter registration identities could be validated using name and other information collected by DDS. (p. 11)	SOS - Agree	**N/A**
1.1 SOS should review the records of individuals with identities that could not be confirmed with DDS records. If identity cannot be verified with existing information, these records should be placed in MIDR status.	SOS – Partially Agree	N/A
Finding 2: Although automated controls help prevent invalid addresses, some voter registrations with these addresses remain. (p. 14)	SOS – Partially Agree DDS – Partially Agree	**N/A**
2.1 DDS should revise the list of documents accepted to ensure they are limited to only those that indicate a residential address.	DDS – Partially Agree	DDS – Ongoing
2.2 SOS should continue its efforts to ensure valid addresses are used for voter registrations, particularly that invalid commercial addresses and other address errors are flagged for correction.	SOS – Agree	SOS – Ongoing
2.3 SOS and DDS should flag addresses associated with Georgia Department of Corrections facilities and county jails for review as potentially ineligible for voter registration.	SOS – Partially Agree DDS – Agree	SOS – Ongoing DDS – Complete
2.4 Clarification should be provided regarding the type of addresses used for college/university students to ensure that the addresses meet statutory residency requirements.	SOS – Disagree	N/A
2.5 SOS or county registrars should develop and provide guidance to homeless service organizations to ensure their clients use the county registrar's office as their mailing address, when required.	SOS – Partially Agree	FY 2027
Finding 3: Processes are generally effective in preventing non-citizens from registering, but control improvements are needed to further minimize the risk of human error. (p. 20)	SOS – Agree DDS – Partially Agree	**N/A**
3.1 DDS should identify, retract, and correct REAL IDs that have been incorrectly issued. DDS should forward to SOS information regarding any IDs associated with a loss in citizenship status to ensure voter registration action.	DDS – Agree	Complete
3.2 DDS should implement a process to ensure that examiners accurately identify, categorize, and verify identity and citizenship documentation. This process could include adopting the use of the Electronic Verification of Vital Events system to assist in the verification of birth certificates.	DDS – Agree	Complete

	Agree, Partial Agree, Disagree	Implementation Date
3.3 DDS should ensure it has resolved the issue that resulted in the submission of voter registration applications prior to issuance of a REAL ID.	DDS – Agree	Complete
3.4 SOS should establish a collaborative process with DDS to periodically identify voter records in cases where the most recent REAL ID reflected non-citizen status and verify that county registrars have obtained appropriate documentation confirming citizenship.	SOS – Agree	Ongoing
3.5 SOS should forward to DDS information regarding non-citizens identified through their audits of voter registration records that include a REAL ID number.	SOS – Agree	Ongoing
Finding 4: Election officials regularly use required third-party information for timely list maintenance, but challenges exist. (p. 25)	SOS – Partially Agree	**N/A**
4.1 To ensure compliance with state law, SOS should continue reviewing its records for county courts that have failed to report. As necessary, SOS should verify whether there has been a lapse in reporting.	SOS – Partially Agree	Ongoing
Finding 5: Election officials reported using various quality control reviews, but procedures could be strengthened to improve accuracy. (p. 30)	SOS – Disagree	**N/A**
5.1 SOS should strengthen controls to prevent and detect duplicate records. For example, SOS could have a process to periodically review duplicate pairs that were cleared by the county registrars to ensure none were cleared in error.	SOS – Disagree	N/A
5.2 SOS should strengthen controls to prevent improper coding for dates of last contact. SOS should also establish periodic, system-wide reviews using GARRA to detect illogical dates of last contact, including future dates and dates prior to the last vote date.	SOS – Partially Agree	FY 2027 (GARRA)
5.3 To help establish uniform quality control reviews, SOS should create written quality control policies and procedures for the counties. Policies should encourage preventing duplicates, conducting transaction reviews shortly after processing, and using GARViS features that improve quality control (e.g., audit reports, Not Eligible Georgian).	SOS – Disagree	N/A
5.4 SOS should strengthen monitoring activities to ensure that counties follow quality control procedures and appropriately resolve errors, including duplicates and issues flagged by GARRA.	SOS – Disagree	N/A

	Agree, Partial Agree, Disagree	Implementation Date
Finding 6: County election officials generally reported sufficient staffing and participation in relevant training, but SOS has requested additional staff. Additionally, written guidance is limited. (p. 35)	SOS – Disagree	**N/A**
6.1 SOS should develop formal policies and procedures on elector list maintenance topics and make them available to counties.	SOS – Disagree	N/A
Finding 7: State and county officials reported various public engagement strategies related to list maintenance. (p. 38)	SOS – Agree	**N/A**
7.1 No recommendations	N/A	N/A

Appendix B: Objectives, Scope, and Methodology

Objectives

This report examines voter registration and list maintenance processes administered by the Office of the Secretary of State. Specifically, our examination set out to determine the following:

1. To what extent does Georgia's voter registration process ensure that the elector's list includes voters' full legal names and valid residential and mailing addresses?
2. To what extent do state and county policies and procedures for list maintenance align with statutory requirements and best practices?

Scope

This special examination generally covered activity related to voter registration and list maintenance that occurred during calendar years 2023 through 2025, with consideration of earlier or later periods when relevant. Voter registration data used in our analysis was extracted from the Office of the Secretary of State's (SOS) electronic voter registration list on September 24, 2025, and REAL ID data used in our analysis was extracted from the Department of Driver Services (DDS) information system on November 24, 2025.

Government auditing standards require that we also report the scope of our work on internal control that is significant within the context of the audit objectives. All of our objectives address aspects of voter registration and list maintenance internal control structure. Specific information related to the scope of our internal control work is described by objective in the methodology section below.

Methodology

Information used in this report was obtained by reviewing relevant laws, rules, and regulations; reviewing agency websites and documents; interviewing officials and staff from DDS, SOS, county election offices, and county courts; and reviewing the U.S. Elections Assistance Commission's *Best Practices: Voter List Maintenance* and policy survey data. Additionally, we analyzed and compared voter data from multiple databases, including:

- **Georgia Voter Registration & Information System (GARViS)** – GARViS is a centralized electronic platform used by SOS and county election offices to maintain and manage voter records, including personal identifying information, registration applications, registration status, precinct assignment, and voting history. GARViS integrates data from multiple sources such as DDS and the Electronic Registration Information Center (ERIC). GARViS is also integrated with the My Voter Page (MVP), where voters can update their voter record. SOS worked with the audit team to create custom queries to extract the voter registration and list maintenance data necessary to complete the audit objectives. Our data reliability assessment determined the voter registration data was sufficiently reliable for use in our analyses.
- **Driver Record and Integrated Vehicle Enterprise System (DRIVES)** – DRIVES is a centralized electronic platform used by DDS to maintain and manage Georgia's driver licensing and motor vehicle records, including personal identifying information, driver status, credential history, and REAL ID verification data. The system supports secure data sharing with SOS, enabling the verification of

voter identity elements such as name, date of birth, and social security number. DRIVES is also the source of automatic voter registration applications. DDS worked with the audit team to create custom queries to extract the REAL ID data necessary to complete the audit objectives. Our data reliability assessment determined the REAL ID data was sufficiently reliable for use in our analyses.

We also surveyed counties to establish their voter registration and list maintenance processes. We recorded an overall response rate of 93% (148 responses from 159 recipients). Based on the response rate, we concluded that responses received were sufficient to incorporate them in our findings. We generally included neutral responses (e.g., "unsure" or "not applicable") but removed responses from specific questions if it was determined the answers were not reliable. We also followed up with counties to confirm responses and made adjustments as needed.

To determine the extent to which Georgia's voter registration process ensures that the elector's list includes voters' full legal names, we reviewed the National Voter Registration Act of 1993, the Civil Rights Act of 1964, the Help America Vote Act of 2002, and Title 11 of the electronic Code of Federal Regulations to identify federal requirements regarding voter registration. We also reviewed O.C.G.A. code sections regarding voter registration and State Elections Board rules and regulations to identify state-specific requirements.

We interviewed SOS elections staff, SOS information technology staff, and staff at some county elections offices to determine the various methods of submitting and processing voter registration applications and specific controls surrounding name elements. We also conducted a limited information system control review of GARViS, the information system that SOS and counties use to process voter registration applications and maintain voter records.

As noted in the finding on page 11, federal law prohibits limiting eligibility based on non-material errors or omissions, such as whether all components of a person's name are listed on the registration. As such, we focused our analysis on verifying identity and eligibility. As described below, this analysis focused on identity verification (i.e., various components of a name, social security number, and birth date) and eligibility verification (i.e., U.S. citizenship). We compiled and analyzed voter registration data from GARViS, including all name elements, date of birth, social security number, and REAL ID number. We then obtained the most recent REAL ID records from DDS for all voter registration records where a REAL ID number was present.

- **Identity Verification** – We compared name elements provided in voter registration data to elements provided in REAL ID data to identify the extent to which these elements matched, and we reviewed identifying information such as date of birth and social security number to further confirm voter identity. Additionally, we compiled REAL ID data for voter registrations that did not include a REAL ID number (or provided an invalid number) by matching voter records to DDS records based on first initial, last name, and date of birth. These matches were subsequently reviewed and were included in the reported number of verified voter identities if determined to match.

  We conducted a secondary analysis of records where the REAL ID number, first initial of first name, and last name in SOS records did not match DDS records to determine whether records that were not identified in our initial matching could be confirmed to be the same individual. To do this, we

manually reviewed a statistically valid sample and projected the results to the full population of 10,197 unmatched records. To ensure the sample was representative, we used random selection without replacement and calculated a sample size necessary to yield a 95% confidence interval with a ±3% margin of error for the population proportion. We assumed a conservative population proportion of 50% in our calculation. This produced a minimum required sample size of 967 records. To account for potential duplicates, 1,100 records were selected. After removing duplicates and pending records, 988 unique records remained for review.

During the manual review, 583 of 988 sampled records were confirmed to be the same individual and 405 could not be confirmed. Among those not confirmed to be the same individual, 94 did not have a social security number, which could have been used by county offices to verify identity in the absence of a valid driver's license number. Of these 94, 56 were in MIDR status, which requires them to present identity documents to vote. The remaining 38 were not in MIDR status and were able to vote without further documentation (12 have a voting history). Using these sample results, we calculated proportions for each sub-population and applied 95% Wald confidence intervals. Projecting these results to the full population of 10,197 records, we estimate the following:

Population & Subpopulation Confidence Interval Calculation, Estimates

	Match	Non-Match	No SSN	No MIDR	Voted
Sample Subpopulation	583	405	94	38	12
Lower Bound	5,719	3,882	749	231	39
Upper Bound	6,315	4,478	1,215	608	281
Estimate	**6,017**	**4,180**	**970**	**392**	**124**

- **Eligibility Verification (U.S. Citizenship)** – While conducting a data reliability check for the REAL ID records used for our identity verification analysis, we found records where the citizenship field showed documentation had been submitted to DDS indicating the person was not a U.S. citizen. Because U.S. citizenship is required for voter registration, this result prompted additional steps to verify this information and evaluate how well DDS and SOS eligibility controls were working.
    - We identified voter registrations where the latest associated REAL ID indicates non-U.S. citizen status. When the registrations were missing or included an invalid REAL ID number, we identified the correct REAL ID number for the individual by matching one or more components of the voter's name. Additional matching criteria were employed, including social security number, birth date, and/or residential zip code.
    - SOS and DDS researched the citizenship status for the individuals listed on these registration records using the Department of Homeland Security's Systematic Alien Verification for Entitlements (SAVE) program administered by the U.S. Citizenship and Immigration Services (USCIS). The SAVE research confirmed U.S. citizenship status for 13,128 (72%) of the 18,159 questioned voter registrations.
    - SOS reviewed voter registration records for the remaining 5,031 (28%) voters to determine the current status of the record, whether county registrars obtained proof of citizenship when required, and whether further action should be taken. These results are discussed in the finding.

During our review, we identified voter records initiated through DDS's Automatic Voter Registration (AVR) system, even though the latest REAL ID record showed they were not U.S. citizens. We submitted these records for DDS's review to determine the cause of incorrectly issued voter registration applications. DDS provided the audit team with REAL ID application and issuance records recorded in DRIVES and their legacy system. Subsequent research and interviews were conducted to assess system controls.

To determine the extent to which Georgia's voter registration process ensures that the elector's list includes voters' valid residential and deliverable mailing addresses, we reviewed the National Voter Registration Act of 1993, the Civil Rights Act of 1964, the Help America Vote Act of 2002, and Title 11 of the electronic Code of Federal Regulations (eCFR) to identify federal requirements regarding voter registration. We also reviewed O.C.G.A. code sections regarding voter registration and State Election Board rules and regulations to identify state-specific requirements.

We interviewed SOS elections staff, SOS information technology staff, and staff at some county elections offices to determine the various methods of submitting and processing voter registration applications and specific controls surrounding residential and mailing addresses.

We compiled and analyzed voter registration data from GARViS, including all address elements in voter records. We used Coding Accuracy Support System (CASS)-certified third-party software[44] to identify potentially invalid residential addresses, such as post office boxes, commercial mail receiving agencies, and other commercial mailrooms (i.e., UPS or FedEx stores), as well as addresses identified with various errors and potentially undeliverable mailing addresses. During the analysis, we determined that many of the address errors flagged by the software were not indicative of an invalid address for voter registration purposes. Consequently, we used the third-party software as a baseline for additional analysis. This included internet-based research on all addresses identified as invalid residential or undeliverable mailing to verify the results.

To determine the extent to which state and county policies and procedures for list maintenance align with statutory requirements and best practices, we compared agency testimony, data, and documents with Georgia and federal election laws, rules, regulations, and the U.S. Elections Assistance Commission's *Best Practices: Voter List Maintenance*. We also used other states' policies and procedures and the National Conference of State Legislature's 50-state review on list maintenance laws to identify additional relevant practices for comparison. We interviewed staff within the SOS Elections Division and reviewed SOS documents, website, and social media to understand relevant list maintenance processes and practices at both the state and local levels; this information was further used for comparison with laws and best practices.

To identify additional relevant list maintenance processes at the local level, we surveyed all Georgia counties and received responses from 148 of 159 counties (93% response rate).[45] We also interviewed counties when deemed necessary. We further reviewed county-level written policies and procedures provided by 27 of 159

[44] CASS-certified software is tested by the United States Postal Service to ensure that it meets specific standards for address validation and standardization.

[45] The counties that did not respond are Bulloch, Emanuel, Floyd, Hart, Jasper, Laurens, Macon, Newton, Peach, Sumter, and Toombs.

counties (17%).[46] We compared county staff testimony and documents with laws and best practices.

To determine the extent to which changes to voter records aligned with laws, rules, regulations, and best practices, we analyzed SOS audit data that tracks statistics and changes to voter records by county user. We used SOS audit data to establish workloads, review processing times, and identify trends or abnormalities. Audit data was analyzed for all Georgia counties for four separate one-month periods (March and May 2024 and January and August 2025). We selected these four months based on specific election-related activity, but such activity may vary significantly year to year; therefore, the results are not generalizable for all time periods. We assessed the controls over SOS data used for this examination and determined that the data used were sufficiently reliable for our analyses.

To determine the extent to which a sample of county websites aligns with list maintenance best practices for voter engagement efforts, we reviewed websites of 43 of 159 counties (27%). County-level web reviews incorporated a sample of counties to ensure at least three counties were reviewed for each of the 14 regions established by the Georgia Association of Voter Registration and Election Officials. While we selected counties of varying size and location, we did not select a statistically significant, random sample; therefore, the results are not generalizable.

To determine the extent to which mandatory training for Georgia county officials covers federal and state list maintenance topics (in accordance with best practices), we reviewed curriculum and assessment questions that were developed for the Georgia Election and Registration Officials Certification training course.

To identify the extent to which other agencies' procedures impact the efficacy of list maintenance, we interviewed staff at the Georgia Department of Driver Services and county courts (Clayton, Coweta, Douglas, Putnam, and Spalding). We also reviewed websites and documents of the Georgia Department of Public Health and the Electronic Registration Information Center (ERIC).

We treated this review as a performance audit. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

If an auditee offers comments that are inconsistent or in conflict with the findings, conclusions, or recommendations in the draft report, auditing standards require us to evaluate the validity of those comments. In cases when agency comments are deemed valid and are supported by sufficient, appropriate evidence, we edit the report accordingly. In cases when such evidence is not provided or comments are not deemed valid, we do not edit the report and consider on a case-by-case basis whether to offer a response to agency comments.

[46] Of the remaining 132 counties, 104 (65%) indicated staff solely rely on SOS written guidance and 28 counties (18%) did not indicate whether county-level documents had been created.

Appendix C: List Maintenance Practices

All the best practices listed below are based on the U.S. Election Assistance Commission's *Best Practices: Voter List Maintenance*. Information on the Secretary of State's practices was primarily obtained through interviews and agency documents. Information on county practices was primarily obtained through our survey of the 159 counties (148 or 93% responded)—responses are reported as a percentage of total respondents. A dashboard providing information by individual county can be found on our website at DOAA Voter List Maintenance Dashboard.

Data/Information Sources

Statute/Best Practice	Secretary of State Practice	County Practice
Federal law: HAVA requires agreements between the commissioner of Social Security and the state department of motor vehicles to verify voter registration information. **State law:** O.C.G.A. § 21-2-221 requires automatic voter registration, in conjunction with DDS, unless the individual opts out. Name and address changes submitted to DDS also serve as voter registration changes, unless specified otherwise.	For new applicants without proof of citizenship, data is sent to DDS or Social Security Administration for verification. DDS submits voter registrations and updates to SOS. DDS voter registration is automatic and requires opt-out.	Not applicable – state-level activity
Federal law: Per HAVA, the state will use state felony and death records to maintain the voter list. NVRA requires the U.S. Attorney's Office to share federal felony convictions with states. **State Law:** O.C.G.A. § 21-2-231 requires various entities to share information with SOS on felony convictions, non-citizenship, mental incompetence, and deaths; counties may also obtain information on deaths from obituaries and verifiable knowledge. **Best Practice:** Third-party notifications from trusted sources may be used to update records. In addition to the statutorily required sources above, these can include reports from other election officials and returned jury notices.	SOS receives statutorily required information including: • Deaths reported from the Department of Public Health and U.S. Social Security Administration; • Felon records from state agencies and the U.S. Attorney's Office; • Court reports on non-citizens and the mentally incompetent. We identified issues with SOS monitoring of court reporting, but improvements were made during the audit.	In addition to information received via SOS, 85% of counties reported receiving information directly from the following third-party sources: • Probate court orders regarding mental incompetence (72%); • Other election offices (72%); • Probate court death records (58%); • Entities maintaining felony records (49%); • Obituaries, newspapers (38%); • County health department death records (26%); • Juror affidavits (19%); • Undeliverable jury mail (18%)
State law: O.C.G.A. § 21-2-225 authorizes SOS to join a non-governmental entity for exchanging information (i.e., ERIC); upon membership, O.C.G.A. § 21-2-232 requires SOS to "regularly" obtain information. **Best Practice:** Best practices note that many states are members of the Electronic Registration Information Center (ERIC) to improve the accuracy of voter registration data.	SOS receives information through ERIC as follows: • National Change of Address (NCOA) and cross-state reports (annually) • Deceased reports (3-5 times per year) • Duplicates (3-4 times per year)	Not applicable – state-level activity

Statute/Best Practice	Secretary of State Practice	County Practice
Federal law: Per NVRA, states may meet the requirements to maintain voter rolls through the USPS NCOA reports. **State law:** O.C.G.A. § 21-2-233 authorizes SOS to compare the voter list to the USPS NCOA to identify address changes. **Best Practice:** State election offices may subscribe to an NCOA product for updates.	As noted above, SOS receives NCOA data through ERIC annually.	Not applicable – state-level activity
Best Practice: Credit bureaus maintain consumer marketing demographic data, which may include address changes.	SOS reported staff considered using credit bureau data but identified barriers (e.g., costs).	No counties reported using credit bureau data.
Best Practice: VoteShield is a web application that uses public voter registration data and tracks changes. If it detects an anomaly, local election officials can investigate the data.	SOS reported that VoteShield has "frequently" obtained voter file data to assess trends, although no anomalies have been detected thus far.	No counties reported independent data exchanges with VoteShield.
Federal law: Per HAVA, states shall designate an office to provide registration and absentee ballot procedures for absent uniformed services voters and overseas voters. **Best Practice:** Election officials may email their military and overseas voters annually to ensure they have valid email addresses and conduct follow-up as needed.	Voters submit a request to vote by absentee ballot; requests remain valid only for the duration of the federal election cycle (approximately one year). The form collects mailing and email addresses. If an email bounces upon attempted ballot delivery, SOS sends the email addresses to the counties for resolution.	Not applicable – state-level activity
State Law: O.C.G.A. §§ 21-2-229 and 21-2-230 allow a voter to challenge another voter's qualifications, which a county may use as a basis for canceling a voter record or denying a registration application.	Not applicable – county level activity	The number of challenges received by each county varies significantly. Eight counties provided voter challenge policies that show some variation in submission requirements, review processes, and timeframes.

Processing Updates

Statute/Best Practice	Secretary of State Practice	County Practice
Federal law: Per HAVA, state databases must be centralized and assign each voter a unique identifier. **Best Practice:** Databases should track a voter's registration through time, including applications, changes, inactivity, and cancellations.	The Georgia Registered Voter & information System (GARViS) meets best practices and federal requirements.	Not applicable - state-level activity

Statute/Best Practice	Secretary of State Practice	County Practice
Federal law: NVRA specifies that voter removal occurs under the following circumstances: registrant's request, death, change in residence, and as provided in state law by reason of criminal conviction or mental incapacity. **State law:** O.C.G.A. § 21-2-231 requires SOS to remove deceased persons and transmit information on felony convictions, non-citizens, and mental incompetence to the counties for removal. O.C.G.A. § 21-2-232 requires registrars to remove voters who request it, or upon receiving information of an out-of-state move with the voter's signature.	SOS sends information to the counties as follows: • Online cancellation requests-real time • Felonies-monthly • Mentally incompetent-monthly • Deaths-weekly • Address changes reported online (real time) or identified via ERIC (annually)	Counties removed the following numbers of voters during the 2022-2024 federal election cycle: • 146,022 by death • 45,145 for felonies • 34,769 due to a move • 10,108 by request • 284 incompetent to vote
Federal law: Local officials shall enter voter information on an "expedited" basis. **State law:** O.C.G.A. § 21-2-231 specifies that county registrars have 60 days to act on information provided on voters with felony convictions, identified as non-citizens through the juror qualification process, declared mentally incompetent with voting rights removed, or deceased.	Not applicable	The proportion of counties that reported processing records in less than five days (by record type): • Vitals (deaths) – 86% • Felons – 80% • Potential duplicates – 78% • Potentially ineligible voters (non-citizens & mentally incompetent) – 68% • Returned mail – 76%
Federal law: NVRA prohibits voter removal due to an address change unless they 1) confirm the change in writing; or 2) fail to respond to a confirmation notice *and* fail to vote in the following two federal general elections. **State law:** O.C.G.A. §§ 21-2-232 through 21-2-234 require confirmation notices when an address change is indicated through another state report (without the voter's signature), ERIC, NCOA, or undeliverable mail. Voters have 30 days to respond or they become inactive.	SOS confirmation notices adhere with federal and state requirements. Between 2021 and 2025, SOS reported mailing 2.2 million address confirmation notices.	Not applicable – state-level activity
State law: O.C.G.A. § 21-2-234 requires that—within the first six months of each odd-numbered year—SOS review the voter list for voters who have had no contact in the preceding five years and mail them a confirmation notice. Those who fail to respond after 30 days become inactive.	SOS's processes to identify and notify no-contact voters are consistent with law. In 2021, 2023, and 2025, SOS reported mailing nearly 590,000 notices. However, this process relies on the recorded date of last contact, which we found errors for approximately 20,000 voter records of the 8 million reviewed (0.25%).	Not applicable - state-level activity

Statute/Best Practice	Secretary of State Practice	County Practice
State law: O.C.G.A. § 21-2-235 specifies inactive voters may vote if they affirm in writing at the polling place that they have not moved outside the jurisdiction. O.C.G.A. § 21-2-218 requires polling places to have forms for voters to provide name and address updates. **Best Practice:** During in-person voting, an inactive voter is prompted to supply their current address. Active voters may also indicate a change in their address.	Georgia's electronic poll books have voters confirm their addresses during voting check-in. Inactive voters are flagged in the poll books, so poll workers know to verify their addresses.	The poll pad system is managed at the state level. Polling places have paper applications for voters who need to update their addresses. Updates are recorded after the election window.
Federal law: States may remove individuals who have not voted in the last two or more consecutive federal general elections. **State law:** Per O.C.G.A. § 21-2-235, voters who have been in inactive status for two consecutive general elections shall be removed from the voter rolls. **Best Practice:** The voter may be cancelled if, after being placed in inactive status and mailed a confirmation notice, they do not have some type of voter activity.	SOS's processes to identify, notify, and cancel inactive voters are consistent with law. SOS reported that staff vet the inactive list by reviewing for errors and comparing to prior lists. Between 2021 and 2025, SOS reported mailing approximately 790,000 notices for inactive voter cancellations.	Not applicable - state-level activity
Federal law: Per NVRA, states must complete systematic removal of voters 90 days prior to a federal election. Systematic removals include removals based on general mailings and address changes identified via database comparisons (e.g., NCOA). **State law:** O.C.G.A. § 21-2-234 specifies that NCOA and no-contact list maintenance activities shall be completed no later than 90 days prior to a federal election.	SOS reports indicate ERIC and NCOA mailers do not conflict with the 90-day quiet period provision.	Systematic list maintenance processes are typically conducted at the state level.

Quality Control Reviews

Statute/Best Practice	Secretary of State Practice	County Practice
Best Practice: Election officials should maintain policies and procedures for reviewing their voter registration data processing.	SOS has quality control processes for the statewide voter registration database, but procedures are not formally documented.	100% of counties reported quality control processes of varying types, and 12 counties provided written procedures.
Best Practice: Procedures should include near real-time reviews of voter registration changes and regular, macro-level data reviews. Transaction reviews should occur promptly after processing. Ideally, a second staff member reviews the source document and compares it to the data entered.	In December 2025, SOS launched the Georgia Registration Review Application (GARRA), which flags records weekly that may need additional review (e.g., invalid addresses, data errors).	90% of counties reported they use GARViS-generated reports to review changes, while 41% reported doing this soon after processing (daily/weekly). 55% of counties reported a second staff member reviews source documents.

Statute/Best Practice	Secretary of State Practice	County Practice
Federal Law: Per HAVA, duplicate names must be eliminated from voter lists. **Best Practice:** "Regularly" conduct reviews of potential record matches to remove duplicate voter records.	GARViS checks for duplicate records nightly. While duplicates are regularly eliminated, we identified over 1,200 individuals with more than one registration.	91% of counties reported reviews for duplicate records in addition to systematic checks by SOS.
Best Practice: "Regularly" spot check electronic processing transactions to understand the anticipated volume and detect anomalies.	SOS reported staff monitor county dashboards to identify abnormal processing patterns (e.g., failure to resolve records).	50% of counties reported reviewing volume trends to identify abnormal processing of records.
Best Practice: Review the voter registration database for voters over 100 years old.	GARRA checks for voters aged 104 years and older or born before 1900.	64% of counties reported reviewing records for voters over 100 years of age.
Best Practice: "Regular" comparison checks of voter registration addresses with Geographic Information System (GIS) data can identify discrepancies and increase data quality.	In 2021, SOS developed a GIS option for counties to compare data with federal and state districts. GARViS controls and GARRA also aid in address validation efforts.	70% of counties reported address reviews with GIS, but frequency varies significantly. We identified nearly 6,800 records with addresses that may be insufficient to establish a voter's residence (e.g., missing or commercial address).
Best Practice: When address errors are identified, next steps may include correcting standardization issues, reviewing street reference guides for formatting, escalating to staff with expertise, and contacting the voter.	County-level activity (O.C.G.A. §§ 21-2-217, 21-2-218, and 21-2-226)	Most counties reported taking additional steps, which most commonly include correcting standardization issues, contacting the voter, and reviewing street reference guides.

Staffing, Training, and Guidance

Statute/Best Practice	Secretary of State Practice	County Practice
Best Practice: Election officials must identify staff resource needs for year-round list maintenance and peak processing periods (e.g., near registration deadlines). Officials should allocate staff for quality control checks.	SOS reported sufficient staffing for all statutorily required duties, but staff noted a desire for additional in-house auditors to provide guidance to counties.	Staffing levels vary significantly, with the ratio of voters to staff ranging from approximately 500 to 100,000. Nevertheless, most counties also reported staffing is sufficient for year-round maintenance (89%), peak processing periods (86%), and quality control checks (81%).
State law: O.C.G.A. §§ 21-2-100 and 21-2-101 require election superintendents and board members (or a designee) to attend at least 12 hours of training annually and obtain the Georgia Election and Registrar Official Certification (GEROC). **Best Practice:** Election officials should invest in continual and comprehensive training. Staff leading list maintenance activities should understand federal and state responsibilities.	SOS reported all guidance, training, and processes disseminated by SOS are reviewed by in-house attorneys to ensure statutory compliance. SOS guidance, available to election officials online, and the GEROC include NVRA and HAVA-related topics.	100% of counties have at least one staff member who has obtained the GEROC and attended relevant training. 94% of counties reported at least one staff member attended training on state or federal laws in the past year.

Statute/Best Practice	Secretary of State Practice	County Practice
Best Practice: Written procedures for database processing, including checklists or decision-making flow charts, serve as useful reference tools for staff and ensure uniformity in processing.	SOS does not have formal policies and procedures for list maintenance but does maintain training PowerPoint slides and an outdated GARViS manual.	Sixteen (16) counties provided standard operating procedures, and one county provided flow charts.

Public Engagement

Statute/Best Practice	Secretary of State Practice	County Practice
Best Practice: Websites can inform the public about list maintenance activities and provide: • Information on how individuals can help maintain the voter list; • Guidance on specific scenarios (e.g., moves, family member deaths, or receiving election material for someone else); • Examples of notifications (e.g., confirmation letters)	SOS reports list maintenance activities online and encourages voters to utilize the My Voter Page (MVP) website to keep information current but does not provide visual examples of list maintenance notifications.	A review of 43 county election websites found that most counties did not provide guidance on specific scenarios or examples of notifications, but 36 counties included links to the MVP site. 39% of counties reported using website announcements for this purpose.
Best Practice: Press releases and media engagements are useful ways to highlight voter list maintenance activities. Social media can directly engage with voters, including reminders to update their registration.	SOS uses media engagement, press releases, and social media to update voters on list maintenance related issues.	To inform the public of list maintenance activities, counties reported using social media (34%), press releases (25%), and other media engagement methods (22%).
Best Practice: If election officials provide training for voter registration drives, they may highlight how voters can look up their voter registration status and that they can collect re-registrations for voters with changes.	County-level activity (O.C.G.A. § 21-2-215 and State Election Board Rule 183-1-6-.02.)	34% of counties reported using voter registration drive trainings for this purpose.
Best Practice: Election officials can consider outreach to entities that may have encounters with more frequent movers (e.g., colleges, utility companies, etc.).	SOS third-party sources do not include these entities.	9% of counties reported partnering with entities involved with movers, such as utility companies.
Best Practice: Every election office mailing can be a voter list maintenance tool. Election officials may send mailings outside of peak times to continue list maintenance during non-election periods.	SOS reported it prints precinct cards on a regular basis for county registrars and also mails cards prior to upcoming elections for voters with updated information. In 2022 and 2023, SOS conducted an in-state update mailing that was sent to voters who appeared to have more recent addresses in the DDS database.	Some counties reported sending mailings during peak processing times (24%) and/or outside of peak election times (19%).

Sources: NVRA, HAVA, Georgia Election Code, State Election Board rules and regulations, U.S. Election Assistance Commission survey data and *Best Practices: Voter List Maintenance*, SOS and county interviews and documents, DDS documents, SOS and county websites, SOS data, and DOAA county survey

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