

## Chapter 2

### Voter Registration at Department of Motor Vehicles (DMV)

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## **I. NVRA and California Elections Code Requirements for DMV Voter Registration**

The National Voter Registration Act of 1993 (NVRA) requires the Department of Motor Vehicles (DMV) to provide voter registration services to people who apply for or renew a driver license or identification card (DL/ID). (52 U.S.C. § 20504(a).) In addition, unless the DMV customer indicates that the voter registration address should not be updated, any change of address form submitted for a DL/ID will also serve as a notice of change of address for voter registration purposes. (52 U.S.C. § 20504(d).) Pursuant to the NVRA, certain information provided in the voter registration application received by the DMV remains confidential. Specifically, an applicant's decision whether to register to vote, and the office at which the voter registration took place, must be kept confidential and may not be used for any purpose other than voter registration. (52 U.S.C. § 20504(c)(2)(D)(iii).)

The NVRA provides that "a completed voter registration portion of an application for a State motor vehicle driver's license accepted at a State motor vehicle authority shall be transmitted to the appropriate State election official not later than 10 days after the date of acceptance," and that "[i]f a registration application is accepted within 5 days before the last day for registration to vote in an election, the application shall be transmitted to the appropriate State election official not later than 5 days after the date of acceptance." (52 U.S.C. § 20504(e)(1), (2).)

The California New Motor Voter Program was enacted in 2016 and took effect in 2018. (Elec. Code, §§ 2260-2270.) Under this program, eligible DMV customers completing an original or renewal DL/ID application, or a change of DL/ID address transaction, will automatically have their voter registration information transmitted to the Secretary of State. Eligible DMV customers will be registered to vote unless they opt out of voter registration during their DMV transaction.<sup>1</sup>

Californians are eligible to vote if they are 18 or older and:

- A United States citizen and a resident of California,
- Not currently serving a state or federal prison term for the conviction of a felony, and
- Not currently found mentally incompetent to vote by a court.

Voter pre-registration is available through the DMV for Californians who are 16 or 17 years old and meet the other eligibility requirements. They will automatically be registered to vote when they turn 18.

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<sup>1</sup> In accordance with California State Assembly Bill 60 ("AB 60"), Stats. 2013, Ch. 524, DMV is authorized to issue a DL/ID without receiving satisfactory proof that the applicant's presence in the United States is authorized under federal law. Customers applying for or renewing a DL/ID under AB 60 will not be presented with the option to register to vote, if using an electronic form or a paper form that has been pre-populated with their information. Regardless of the type of form these customers use, or even if they are submitting change of address information, these customers will not have their information transmitted to the Secretary of State.

The following registration services are provided by DMV, in connection with DL/ID applications or changes of address:

- An electronic Driver License and ID Card Application (eDL44 and eDL44C) containing the voter registration application that can be completed online prior to visiting a field office, or during a field office visit at a touch screen terminal or ADA (Americans With Disabilities Act) station.
- Paper and electronic change of address forms for DL/ID purposes (DMV 14) that serve as a notice of change of address for voter registration purposes, unless the customer indicates otherwise on the change of address form. These forms also contain a voter registration application.
- For eligible licensees or card holders, paper DL/ID Renewal by Mail applications (DL 410 and DL 6) contain a voter registration application.
- Paper Voter Registration Cards (VRCs) in field offices for customers who want to register to vote but who are not applying for, renewing, or changing an address for a DL/ID. VRCs are also provided to customers who are unable to complete their DL/ID transaction in the field office due to a system outage, and who request a VRC.
- Secure and timely electronic transmission to the Secretary of State of registration information collected from DL/ID applications and change of address forms.
- Timely delivery of completed paper VRCs to the county elections officials.
- Voter registration information and a link to the Secretary of State's website on the DMV's website.
- Referral to the Secretary of State or county elections officials when customers inquire regarding their voter registration status. DMV cannot provide this information to the customer.

## **II. DMV Forms and Procedures**

### **A. DL/ID Transactions at a Field Office**

#### **1. Electronic DL/ID Application, Renewal, or Replacement – eDL44 and eDL44C**

The electronic application form for a DL/ID is the eDL44. For commercial license applications, the form is called the eDL44C. A voter registration application is part of these electronic forms. These forms can be completed by customers in the field office on special touch screens when applying in person. Alternatively, these forms can be completed at home, prior to a visit, by accessing them online.

On the eDL44 and eDL44C forms, if the customer does not answer "Yes" to the citizenship and other voter eligibility questions, the customer is not presented

with the voter registration portion of the electronic application and no customer data is transmitted to the Secretary of State.

For customers who indicate they are eligible to vote, the eDL44 and eDL44C asks whether the customer would like to register to vote, update their voter registration information, or opt out of voter registration. If the customer would like to register or update their registration, the eDL44 and eDL44C solicits specific voter registration information, such as political party preference and whether the customer wants to become a permanent vote-by-mail voter. The customer's answers are delivered to Secretary of State in an electronic file that also contains minimum identification information, such as a DL/ID number, name, residence and mailing address, if available, date of birth, and digitized signature (which is retrieved at a later time), as required by the California Motor Voter Program. If the customer indicates that they would like to opt out of voter registration, the customer is not presented with the remaining portion of the voter registration application. If a customer indicates they are eligible to vote but opts out of registration, that customer's information is provided to the Secretary of State for outreach purposes.

## **2. Paper DL/ID Application, Renewal, or Replacement – DL44/DL44C**

In some instances, a paper DL/ID application is requested or required. The voter registration portion of the application is part of the paper DL/ID application, which is called the DL44 or DL44C (for commercial licenses). All voter eligibility, preference, and opt-out questions on the eDL44 and eDL44C also appear on the DL44 and DL44C. DMV technicians enter the information from the paper application into the DMV system, and provide the customer with the ability to verify that the entered information is correct, prior to completing the application. If the customer does not answer "Yes" to the citizenship and other voter eligibility questions, no customer data is transmitted to the Secretary of State. For customers who indicate they are eligible to vote, their answers are delivered to Secretary of State in an electronic file that also contains minimum identification information, such as a DL/ID number, name, residence and mailing address, if available, date of birth, and digitized signature (which is retrieved at a later time), as required by the California Motor Voter Program. If a customer indicates they are eligible to vote but opts out of registration, that customer's information is provided to the Secretary of State for outreach purposes.

## **3. Change of Address Form – DMV 14**

The Notice of Change of Address Form (DMV 14) is used to process a DL/ID change of address. The form is available in a paper format that can be submitted in person at a DMV office. (It can also be submitted by mail to DMV headquarters in Sacramento, or electronically via the Internet.) The DMV 14 includes a section permitting the customer to indicate if they do not want their

change of address for DL/ID purposes to also change their address for voter registration purposes. The DMV 14 also includes a voter registration application. If the customer wants their change of address to be used for voter registration purposes, or if the customer completes the voter registration portion of the form and indicates they are eligible to vote, the customer's answers are delivered to Secretary of State in an electronic file that also contains minimum identification information, such as a DL/ID number, name, residence and mailing address, if available, date of birth, and digitized signature (which is retrieved at a later time), as required by the California Motor Voter Program. If, on the voter registration portion of the form, the customer does not answer "Yes" to the citizenship and other voter eligibility questions, no customer data is transmitted to the Secretary of State. If a customer indicates they are eligible to vote but opts out of registration, that customer's information is provided to the Secretary of State for outreach purposes.

#### 4. **DMV Voter Registration Card**

The Secretary of State prints Voter Registration Cards (VRCs) for the DMV so that all DMV field offices can provide VRCs to applicants who want to register to vote but are not transacting an original or renewal DL/ID application, or a change of address for DL/ID purposes. VRCs are also provided to customers who are unable to complete their DL/ID transaction in the field office due to a system outage, and who request a VRC. To identify VRCs submitted by registrants through the DMV, the DMV VRCs include a DMV icon in the upper right-hand corner of the document. Secretary of State is therefore able to track and report DMV registration activity as required under the NVRA. DMV field offices within counties designated as minority language counties by the federal Voting Rights Act provide paper VRCs in the prescribed minority language(s) of that county. Applicants who wish to register in this way may provide the VRC to the DMV for submission or they may mail it directly to their county elections office, as the VRCs are postage-paid and pre-addressed accordingly.

DMV employees do not complete entries on a VRC unless an applicant requests assistance. DMV employees check to make sure that applicants complete and sign the VRC if it is submitted by an office visitor who is not completing a DL/ID application or changing their DL/ID address. DMV employees are **not** required to sign the VRC as the person assisting with the registration.

If an applicant has difficulty completing the English language VRC, the DMV employee will:

- Ask the applicant if he/she prefers a VRC in another language.

- If the VRC is not available at the DMV field office in the appropriate language, give the applicant the appropriate toll-free number to call and order election materials in the preferred language.
- Inform the applicant the VRC may be completed elsewhere, if preferred.

## **B. DL/ID Transactions by Mail**

### **1. DL/ID Renewal – DL6/DL410 FO**

Customers who are eligible to renew their DL/ID by mail receive a renewal form in the mail, called a DL6. Except for customers with an AB 60 DL/ID<sup>2</sup>, the DL6 contains a voter registration application. Customers who are eligible to renew their DL/ID by mail and have not yet received a DL6 may submit a renewal by mail eligibility information form called a DL410 FO, which also contains a voter registration application. Customers may provide an updated address on these forms. Both forms include a section permitting the customer to indicate if they do not want their change of address for DL/ID purposes to also change their address for voter registration purposes. If the customer wants their change of address to be used for voter registration purposes, or if the customer completes the voter registration portion of the form and indicates they are eligible to vote, the customer's answers are delivered to Secretary of State in an electronic file that also contains minimum identification information, such as a DL/ID number, name, residence and mailing address, if available, date of birth, and digitized signature (which is retrieved at a later time), as required by the California Motor Voter Program. If the customer does not answer "Yes" to the citizenship and other voter eligibility questions, no customer data is transmitted to the Secretary of State. If a customer indicates they are eligible to vote but opts out of registration, that customer's information is provided to the Secretary of State for outreach purposes.

### **2. Change of Address – DMV 14**

The Notice of Change of Address Form (DMV 14) is used to process a DL/ID change of address. The form may be submitted by mail to DMV headquarters in Sacramento. (The form can also be submitted in person at a DMV field office, or electronically via the Internet.) The DMV 14 includes a section permitting the customer to indicate if they do not want their change of address for DL/ID purposes to also change their address for voter registration purposes. The DMV 14 also includes a voter registration application. If the customer wants their change of address to be used for voter registration purposes, or if the customer completes the voter registration portion of the form and indicates they are eligible to vote, the customer's answers are delivered to Secretary of State in an electronic file that also contains minimum identification information, such as a DL/ID number, name, residence and mailing address, if available, date of

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<sup>2</sup> The renewal by mail form that is sent to AB 60 licensees is called a DL6U.

birth, and digitized signature (which is retrieved at a later time), as required by the California Motor Voter Program. If, on the voter registration portion of the form, the customer does not answer “Yes” to the citizenship and other voter eligibility questions, no customer data is transmitted to the Secretary of State. If a customer indicates they are eligible to vote but opts out of registration, that customer’s information is provided to the Secretary of State for outreach purposes.

## **C. DL/ID Transactions Over the Internet**

### **1. Driver License Internet Renewal (DLIR)**

Eligible customers may renew their DL/ID via the Internet. A voter registration application is contained within the online renewal application. All of the same features of the eDL44/eDL44C are included in the online renewal internet form, including the ability to elect to update the voter registration address, and the ability to register, update their voter registration information, or opt out of voter registration. If the customer indicates that they are not eligible to vote, the customer is not presented with the remaining portion of the voter registration application. If a customer indicates they are eligible to vote but opts out of registration, that customer’s information is provided to the Secretary of State for outreach purposes. The online renewal internet form includes a section permitting the customer to indicate if they do not want their change of address for DL/ID purposes (if any) to also change their address for voter registration purposes. If the customer wants their change of address to be used for voter registration purposes, or if the customer completes the voter registration portion of the form and indicates they are eligible to vote, the customer’s answers are delivered to Secretary of State in an electronic file that also contains minimum identification information, such as a DL/ID number, name, residence and mailing address, if available, date of birth, and digitized signature (which is retrieved at a later time), as required by the California Motor Voter Program.

### **2. Internet Change of Address (ICA) – DMV 14**

Eligible customers may submit a change of address to their DL/ID via the Internet, using the Notice of Change of Address Form (DMV 14). (The form can also be submitted in person at a DMV field office, or by mail to DMV headquarters in Sacramento.) The DMV 14 includes a section permitting the customer to indicate if they do not want their change of address for DL/ID purposes to also change their address for voter registration purposes. The DMV 14 also includes a voter registration application. If the customer wants their change of address to be used for voter registration purposes, or if the customer completes the voter registration portion of the form and indicates they are eligible to vote, the customer’s answers are delivered to Secretary of State in an electronic file that also contains minimum identification information, such as a DL/ID number, name, residence and mailing address, if available, date of



birth, and digitized signature (which is retrieved at a later time), as required by the California Motor Voter Program. If, on the voter registration portion of the form, the customer does not answer “Yes” to the citizenship and other voter eligibility questions, no customer data is transmitted to the Secretary of State. If a customer indicates they are eligible to vote but opts out of registration, that customer’s information is provided to the Secretary of State for outreach purposes.

### **III. Receipt and Processing of Electronic Voter Registration Information by Elections Officials**

The NVRA requires completed voter registration applications submitted as part of a DL/ID application to be transmitted to the appropriate elections official not later than 10 days after acceptance by the DMV. (52 U.S.C. § 20504(e)(1).) If a voter registration application submitted as part of a DL/ID application is accepted within five days before the last day for registration to vote in an upcoming election, the NVRA requires that the application be transmitted within five days of acceptance. (52 U.S.C. § 20504(e)(2).) Further, the NVRA and state law provide that if a valid application is submitted to the DMV on or before the 15th day before an election, the applicant should be registered to vote in the election. (52 U.S.C. §20507(a)(1)(A); Elec. Code, § 2102(a)(2).)

#### **A. Transmission of Electronic Voter Registration Information to the Secretary of State**

The Secretary of State retrieves voter registration information from the DMV several times each week.

For DMV customers who have attested to their eligibility to register to vote, the Secretary of State retrieves the corresponding electronic voter registration records, updates to voter registration records, and change of address requests. The Secretary of State then analyzes the records, excludes records of customers who opted out of voter registration, duplicate records and records for which a more recent registration exists, and processes the remaining records directly into the statewide voter registration system. For DMV customers who have attested to their eligibility to register to vote, but who have indicated that they do not want to register to vote or update their voter registration information, the Secretary of State sends an Opt Out Postcard, which provides information on how the customer can register to vote. (Elec. Code, § 2263(b).)

DMV customers who submitted updates to an existing voter registration via a paper form (DL44, DL410 FO, DL6, or DMV 14) and left a blank response for political party, vote by mail preference, and/or ballot material language will retain their previously indicated preferences from the existing voter registration record, for those fields. (Elec. Code, § 2265(c).) The Secretary of State sends a Voter Preference Postcard to all DMV customers who submitted updates to an existing

voter registration via a paper form and left a blank response for political party, vote by mail preference, and/or ballot material language, notifying them that they are registered and providing information on how to update their voter registration information. (DMV electronic forms do not permit customers attempting to update their voter registrations to leave those fields blank.)

For DMV customers who applied for or renewed a DL/ID or changed their address for voting purposes via a paper form (DL44, DL410 FO, DL6, or DMV 14), but based on inconsistent or missing information the Secretary of State is unable to determine if they were eligible to vote, or if they wanted to register or update their voter registration information, and for DMV customers who changed their address, but indicated they did not want to share their change of address for voter registration purposes, the Secretary of State will send these DMV customers a Registration Opportunity Postcard, notifying them that their recent attempt to register or update their voter registration information through their DMV transaction was not successful, and providing information on how to register to vote or update their current voter registration.

## **B. Processing of Voter Registration Information by the Secretary of State and County Elections Officials**

County elections officials access the new and updated voter registration records in the statewide voter registration system electronically through their elections management systems (EMSs) for processing.

County elections officials will also receive EMS messages for DMV voter registration records indicating a potential change of address for an existing voter registration. County elections officials either accept or reject these possible match determinations. The voter registration record will be updated in the statewide voter registration system accordingly.<sup>3</sup>

DMV customers who submitted updates to an existing voter registration via a paper form (DL44, DL410 FO, DL6, or DMV 14) and left a blank response for political party, vote by mail, and/or ballot material language preference will retain their previously indicated preferences from the existing voter registration record, for those fields. (Elec. Code, § 2265(c).) DMV electronic forms do not permit customers attempting to update their voter registrations to leave those fields blank.

For all new or updated voter registrations, including changes of address, county elections officials provide notification to the voter by mailing a non-forwardable Voter Notification Card (VNC). (Elec. Code, § 2155.)

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<sup>3</sup> A new or updated voter registration resulting from a DMV transaction, and a DMV change of address that results in an updated voter registration, all constitute a notification of continued residency within California, for purposes of determining eligibility for cancellation of a voter's registration. (See Chapter 4, Voter Registration Applications and Voter List Maintenance, p. 19 n. 13.)

## IV. Receipt of VRCs and Processing by County Elections Officials

### A. Sources

1. **Local DMV Field Offices:** DMV field offices forward to the county elections official all VRCs completed and submitted in their offices. For a list of field offices by county, please visit the DMV's website: [www.dmv.ca.gov](http://www.dmv.ca.gov)
2. **Secretary of State:** Most VRCs available in DMV offices are not pre-addressed to a specific county. Rather, they are pre-addressed to the Secretary of State. VRCs from DMV field offices that are completed and mailed by a DMV customer outside of a DMV field office will reach the Secretary of State, who will forward these VRCs to the appropriate county elections official.
3. **Other Counties:** DMV field offices forward all VRCs submitted in the field office to either the Secretary of State or the elections official in the county where the DMV field office is located. The Secretary of State forwards these VRCs to the appropriate county elections official. Because DMV applicants occasionally go to field offices outside their county of residence, county elections officials may receive VRCs forwarded from DMV field offices for applicants who live in another county; the county elections official receiving such VRCs forwards them to the appropriate county elections official.

### B. Method and Frequency of Transmittal

1. **Local DMV Field Offices:** Local DMV field offices forward all VRCs received to county elections offices on a daily basis. The VRCs are typically sent by priority mail. County elections offices may also work out alternate arrangements with their local DMV field offices for the transmittal of VRCs.
2. **Secretary of State:** The Secretary of State sorts and forwards to the appropriate county elections offices all VRCs received on a daily basis.
3. **Other Counties:** The frequency that county elections offices forward DMV VRCs completed by out-of-county residents to the appropriate county elections office will vary according to each county elections office's policy or practice. Each county elections office may want to contact other county elections offices to arrange for specific transmittal methods/frequencies.

### C. Processing VRCs

County elections officials must track the number of registrations received from DMV, after subtracting VRCs that are forwarded to other counties and adding VRCs received from other counties.

## **V. Training**

While not required by the NVRA, the Secretary of State and DMV provide training to their employees.<sup>4</sup> The Secretary of State annually provides a live training to all Secretary of State employees responsible for the receipt and processing of voter registration information from DMV, including but not limited to training on the procedures for regular monitoring of the timeliness of the receipt of registration data from DMV transactions and the protocol for reporting and addressing problems with the timeliness and quality of the voter registration data received from DMV. DMV provides initial training to new employees and annual refresher trainings to continuing employees who interact with the motor voter system, including but not limited to training on processing voter information submitted to DMV, transmission deadlines in the NVRA, and procedures for identifying and reporting errors or delays.

## **VI. Resources and Monitoring**

County elections officials will contact the Secretary of State's office if they have questions regarding voter registrations completed or attempted through the California New Motor Voter Program. DMV customers with voter registration questions can contact the Secretary of State's Voter Hotline at (800) 345-VOTE (8683) (or the other toll-free hotlines that are available in 9 languages).

The Secretary of State and DMV have appointed NVRA coordinators. DMV's NVRA coordinator monitors DMV's compliance with the NVRA, including the processing and timely transmission of voter registration information submitted to DMV. The Secretary of State's Section 5 NVRA coordinator monitors the Secretary of State's compliance with Section 5 of the NVRA, including the processing and timely transmission of voter registration information submitted to DMV.

## **VII. Additional Information**

### **A. Late Voter Registrations and Transmission Delays**

Under the NVRA and state law, a voter registration is timely as long as it is submitted to the DMV by the last day to register to vote, i.e., the 15<sup>th</sup> day prior to an election. (52 U.S.C. § 20504(a)(1)(A); Elec. Code, § 2101(a)(2).) If voter registration records resulting from DMV transactions are not transmitted from DMV to the Secretary of State within five or ten days after acceptance as required under the NVRA (52 U.S.C. § 20504(e)(1), (e)(2)), the Secretary of State will, when required or appropriate, notify county elections officials, who may need to take additional steps to count ballots cast by affected voters.

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<sup>4</sup> This training is pursuant to the Stipulation and Order Regarding Enforcement of Settlement Agreement ("Stipulation"), League of Women Voters of California, et al. v. Annis, et al., No. 3:17-cv-02665-LB (N.D. Cal. Feb. 5, 2019); the terms of the Stipulation expire on December 31, 2020.

While not required by the NVRA, DMV will notify the Secretary of State of any errors or delays related to the timely transmission of voter registration records received by DMV within three business days of the discovery of the error or delay by DMV management.<sup>5</sup> The Secretary of State will notify county elections officials of any errors or delays related to the timely transmission of voter registration records from DMV within three business days of the discovery of the error or delay by Secretary of State management.

If there is such a delay in forwarding voter registration records resulting from DMV transactions to the Secretary of State, a new or updated voter registration may not appear on the county or precinct voter rolls even though the applicant submitted a timely voter registration application to the DMV. If this happens, the applicant will be asked to cast a provisional ballot, which will be counted as part of the official canvass as long as the county elections office receives the voter registration application before the end of the canvass period. State law authorizes a county elections official to seek a court order extending the canvass period, in certain circumstances. (Elec. Code, § 15701.) State law also provides that a superior court in the county of a voter's residence may order a voter's provisional ballot to be included in any semiofficial or official canvas. (Elec. Code, § 14310(c)(2)(A)(iii).)

Alternatively, California law permits a voter to file a motion in superior court on Election Day to compel registration if the voter registered to vote on or before the deadline to register at the DMV or another voter registration agency designated as such under the NVRA. (Elec. Code, § 2142.) Conditional voter registration (and conditional voting) are also available at specific locations starting the day after the close of registration up through Election Day. (Elec. Code, § 2170.)

## **B. Minority Language Availability**

DMV makes voter registration available in the following languages: English, Spanish, Chinese, Hindi, Japanese, Khmer, Korean, Tagalog, Thai, and Vietnamese. The Secretary of State prints and distributes VRCs in the same languages. Upon request, the Secretary of State will provide county elections officials with VRCs in one or more languages. The elections official will, in turn, supply these forms as required, or upon request, to local DMV field offices within their county.

## **C. DMV Mobile Units in Rural Counties**

Some counties do not have DMV field offices, but instead are served by mobile units, or "travel runs." Processing requirements are the same for travel runs.

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<sup>5</sup> This notification requirement is pursuant to the above-referenced Stipulation.