



A Review of National Voter Registration Act Compliance in SNAP Applications and How Anti-Hunger Groups Can Advocate for Improvements

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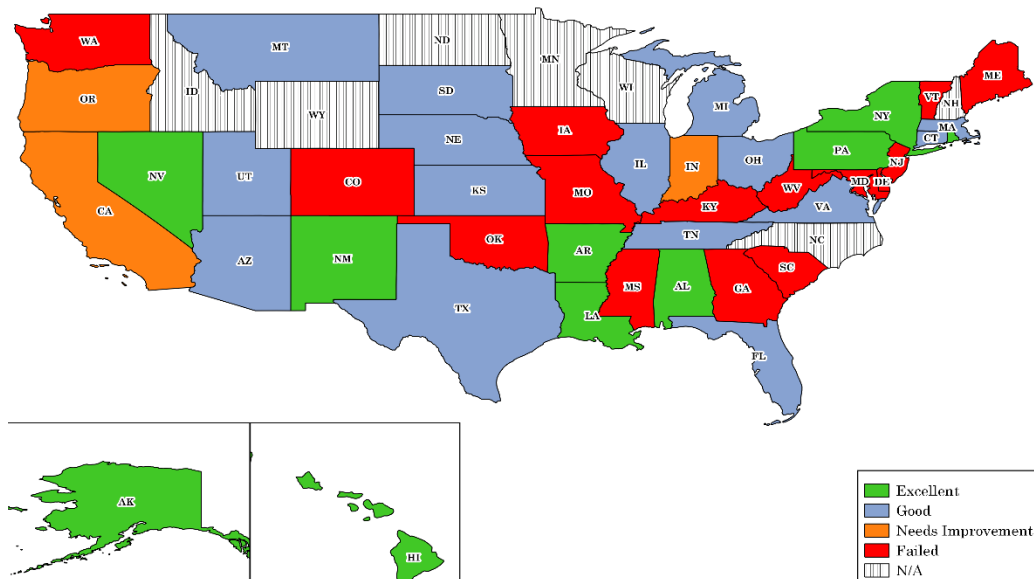
Executive Summary

This report by the Food Research & Action Center and Project Vote – *A Review of National Voter Registration Act Compliance in SNAP Applications and How Anti-Hunger Groups Can Advocate for Improvements* – highlights the importance of the National Voter Registration Act (NVRA) in ensuring that more low-income U.S. citizens are registered to vote at state SNAP agencies and the role of anti-hunger groups in that effort.

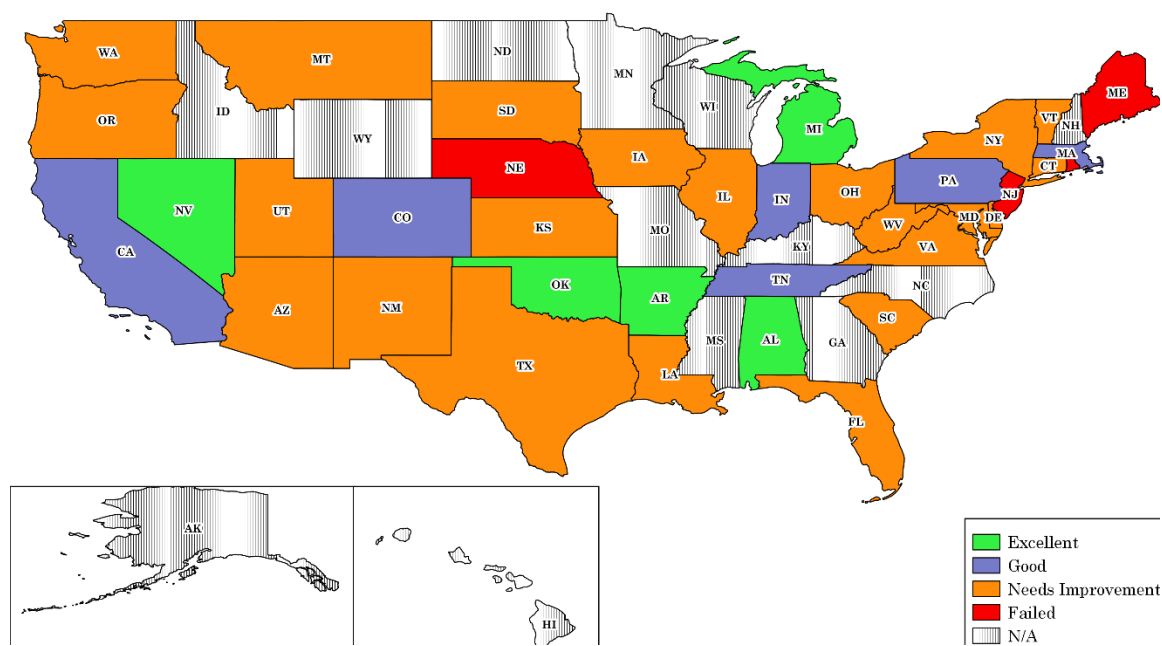
The NVRA requires public assistance agencies—including SNAP agencies—to provide voter registration applications and also affirmatively offer to help clients register to vote any time clients apply for benefits, review/recertify benefits, or submit a change of address. While there are many points of interaction where state SNAP agencies can better comply with the NVRA and promote opportunities to register to vote, the initial SNAP application constitutes a prime instrument for connecting low-income citizens to voter registration, since every SNAP applicant must undergo this step. This report offers a first-ever state-by-state look at the SNAP application and voter registration opportunities at that point. Through an analysis of state paper (downloaded from the state agency website) and online applications, this report provides:

- **Findings on how state SNAP applications are promoting the NVRA (pp. 13 - 21):** The report explains how too many SNAP agencies are falling short in using SNAP applications as vehicles to connect low-income citizens to voter registration opportunities. Of note:

SNAP paper applications: Of the 44 state paper applications reviewed, 10 states had paper applications with excellent NVRA compliance; 15 states had good NVRA compliance; and 3 states provided some mention of voter registration, but should greatly improve their compliance by adopting the specific requirements of the NVRA. In 16 states, the paper SNAP application did not mention voter registration services at all, undermining the intent of the NVRA and opportunities for clients to register to vote.



SNAP online applications: Of the 37 state online applications reviewed, 5 states had online applications with excellent NVRA compliance; 6 states had good NVRA compliance; and 22 states provided some mention of voter registration, but could greatly improve their compliance by adopting the specific requirements of the NVRA. In 4 states, the online SNAP application failed to mention voter registration services at all.



- **Best practices to adopt in state SNAP applications (pp. 22 - 24):** The report includes many best practices for states to adopt for SNAP paper and online applications, including using the requisite NVRA language, featuring the information on voter registration in a prominent location that does not interfere with the completion of the SNAP application, and ensuring that SNAP applicants can readily access the state voter registration application.
- **Opportunities for anti-hunger advocates (pp. 24 - 26):** In addition to ensuring SNAP applications foster the goals of the NVRA, anti-hunger advocates can engage in voter registration efforts by raising voter registration opportunities and concerns during their regular discussions with SNAP agency personnel or by requesting a special meeting regarding the NVRA.

Helping low-income Americans strengthens our democracy, makes it possible for a larger share of the electorate to exercise its Constitutional rights, and empowers people in ways that foster equality and justice. It also helps individuals gain a greater sense of control in their lives and community. Anti-hunger advocates are an untapped resource to further this goal.

About the Food Research & Action Center

The Food Research & Action Center (FRAC) is the leading national organization working for more effective public and private policies to eradicate domestic hunger and undernutrition. For more information about FRAC, or to sign up for FRAC's *Weekly News Digest* and other publications, go to: www.frac.org.

About Project Vote

Project Vote was a national, nonpartisan, nonprofit organizations founded on the belief that an organized, diverse electorate is the key to a better America. Project Vote's mission is to build an electorate that accurately represents the diversity of America's citizenry. For more information, Project Vote's website is still available at: www.ProjectVote.org.

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expressed are solely the responsibility of the authors.

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I. SNAP and Democracy: A Little-Known Connection

In recent presidential election years, approximately 36 percent of all adult citizens with annual household incomes below \$25,000 were not registered to vote.ⁱ In those same periods, only approximately 17 percent of those with annual incomes of at least \$75,000 were not registered.ⁱⁱ If low-income citizens were registered at the rate of citizens with higher incomes, millions more citizens would be registered to vote.

Fortunately, a solution to this disparity in voter registration rates is available, albeit underutilized: The National Voter Registration Act (NVRA) of 1993.ⁱⁱⁱ Indeed, the Presidential Commission on Election Administration referred to the NVRA as “the election statute most often ignored.”^{iv} The NVRA requires states to affirmatively offer voter registration opportunities to clients of several state health and social services programs, including the Supplemental Nutrition Assistance Program (SNAP), formerly known as the Food Stamp Program.^v

Anti-hunger advocates are well-positioned to play an important role in ensuring this important voting rights law works because of their strong relationships with many of the state agencies that administer SNAP and their expertise in state SNAP policies. Advocates also have strong connections to the clients that these agencies serve and understand the importance of engaging low-income citizens in the democratic process. Furthermore, there is no reason that anti-hunger groups cannot get involved in advocating for better NVRA compliance because the voter registration required by the NVRA is completely non-partisan.¹ When engaging in voter registration activities, the NVRA prohibits states from influencing a person’s decision about registering to vote, promoting a political party, telling people how to vote, or requiring people to register to vote.

By highlighting simple changes in SNAP applications, this report provides anti-hunger advocates with the tools necessary to support civil rights through improved NVRA compliance at state SNAP agencies. To that end, this report:

- reviews requirements in the NVRA as related to SNAP agencies;
- highlights which states are and are not providing the required voter registration opportunities and which are or are not using best practices in paper and online SNAP applications;
- identifies best practices for affirmatively offering voter registration to individuals completing either paper or online SNAP applications;² and
- provides actions that anti-hunger advocates and others can take for improving voter registration opportunities through paper and online SNAP applications.

Anti-hunger advocates are well-positioned to play an important role in ensuring this important voting rights law works.

¹ While these NVRA-related activities are permissible for 501(c)(3)s, anti-hunger groups should ensure that such activities are permissible based on their funding sources.

² In this report, SNAP applications that the public can download from the web to later physically return or mail to a state agency will be referred to as “paper applications.” Applications that are completed and submitted online will be referred to as “online applications.”

A caveat on the scope of this review

This report examines how voter registration services are included in paper and online state SNAP applications. The applications that were examined were available to FRAC, Project Vote, and anti-hunger advocates during the summer and fall of 2016. This report discusses ways that states could improve how they provide NVRA services by adopting recommended best practices. But it is important to note that some of the failings identified in this report may be addressed by public assistance agencies at other points in the application process (e.g., during a face-to-face interview). These other steps would not have been observed during the review conducted for this report and, therefore, this report cannot be used to determine if a state is in violation of the legal requirements of the NVRA.

Background on NVRA requirements for SNAP Agencies

Congress passed the NVRA in 1993 to increase the number of citizens registered to vote and to help address past discriminatory practices in voter registration.^{vi} Because the Act requires states to offer voter registration opportunities when applying for or renewing a driver's license, it is often known as "Motor Voter."

A lesser known, but equally important, provision of the NVRA requires states to affirmatively offer voter registration services to applicants and participants of several social programs, including the Supplemental Nutrition Assistance Program (SNAP), the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), Medicaid, Temporary Assistance for Needy Families (TANF), and state programs serving people with disabilities.^{vii}

Congress included health and social services programs in the NVRA to reach the varied populations – including young adult and elderly citizens, lower-income households,

highly mobile populations, and people with disabilities – that are less likely to drive or otherwise benefit from the "Motor Voter" provision in the Act, but that could be reached through these other government agencies.

Can Improving NVRA compliance at SNAP agencies make a difference?

More than 40 million initial and recertification applications for SNAP benefits have been filed annually in recent years.^{viii} Despite participation of tens of millions of low-income adult citizens in the SNAP program alone, fewer than a million voter registration applications per year have originated from public assistance clients during the same time period.^{ix}

Given the low voter registration rates of lower-income people, the high rates of residential mobility of U.S. citizens eligible for SNAP, and past voter registration performance of state SNAP agencies when the law is implemented well, Section 7 of the NVRA should be helping millions more low-income citizens to register to vote.

Advocacy regarding voter registration requirements at SNAP agencies can make a huge difference. Through concerted advocacy efforts to promote NVRA compliance by health and social services agencies, Project Vote and its partners have helped register millions of citizens.

For example, in Missouri in 2007, advocates found that many Department of Social Services' (DSS) offices were not offering voter registration services. After advocates intervened in late 2008, more than 100,000 clients each year accepted the offer to register to vote or update their registration

through DSS offices in Missouri during the period from 2009 to 2012.^x Likewise, in Ohio, again after advocates discovered severe non-compliance problems and intervened, citizens filed nearly 100,000 voter registration applications each year in 2010 and 2011 through the Department of Jobs and Family Services. Similar results have been obtained in other states.^{xi} Efforts by advocates can make a meaningful difference.

How can anti-hunger advocates help?

To help citizens register to vote, the NVRA must be properly implemented. Unfortunately, advocates too often have found state health and human services agencies failing to comply with the requirements of the NVRA. One avenue toward better implementation is to improve how voter registration is presented in states' paper and online applications for SNAP benefits. This is where state and local anti-hunger advocates can play a role.

Using their expertise in nutrition programs in their state, and their good relationships with the state agencies that run these programs, anti-hunger advocates can help SNAP programs register hundreds of thousands – even millions – of citizens each year by complying with the NVRA.

II. NVRA Requirements for State SNAP Applications

State SNAP applications can take a variety of forms as long as the applications comply with federal and state requirements. For instance, many states offer combined applications for multiple benefits, typically SNAP, TANF, and Medicaid. Additionally, most states allow individuals to apply for,

and renew, their benefits through a variety of modes, including in-person transactions at the public assistance agency or remote transactions via postal mail,

telephone, or the internet. The NVRA voter registration requirements apply whether transactions occur in-person or remotely.^{xiii}

Section 7 of the NVRA requires that certain voter registration services be provided when a client applies for SNAP benefits,

By highlighting simple changes in SNAP applications, this report provides anti-hunger advocates with the necessary tools to support improved NVRA compliance at their state's SNAP agencies.

The NVRA voter registration requirements apply whether agency transactions occur in-person or remotely.

renews/recertifies their eligibility for benefits, or submits a change of address to the agency. These are often called “covered transactions” because they are interactions where voter registration services must be provided under the NVRA. The following required voter registration services for all covered transactions are:

1. Distribute a form using a statutorily prescribed question, often referred to as the “voter preference question”:

“If you are not registered to vote where you live now, would you like to apply to register to vote here today?”^{xiii}

Yes
 No

2. Distribute several disclosures, including the following:

- “Applying to register or declining to register to vote will not affect the amount of assistance that you will be provided by this agency.”^{xiv}
 - “If you would like help in filling out the voter registration application form, we will help you. The decision whether to seek or accept help is yours. You may fill out the application in private.”^{xv}
 - “If you believe that someone has interfered with your right to register or to decline to register to vote, your right to privacy in deciding whether to register or in applying to register to vote, or your right to choose your own political party or other political preference, you may file a complaint with [name, address, and telephone number of the appropriate official to whom such complaint should be addressed].”^{xvi}
3. Distribute a voter registration form, unless an individual declines in writing;^{xvii}
 4. Provide the same degrees of assistance in completing voter registration application as is provided in completing the office’s own forms;^{xviii} and
 5. Accept completed voter registration applications for timely transmittal to the appropriate election officials.^{xix}

Not all of the NVRA required statements must be included in the SNAP application per se, but all the NVRA requirements must be addressed during the SNAP application process.

As of 2016, 12 states had been sued by civil rights organizations or the U.S. Department of Justice for violations of the NVRA’s public agency provisions.^{xx} Adopting best practices in the design of SNAP applications not only protects clients and furthers the purposes of the NVRA but can greatly reduce the possibility of non-compliance and help states avoid costly litigation.

Adopting best practices in SNAP application can greatly reduce the possibility of non-compliance and help states avoid costly litigation.

III. Findings of the Review for NVRA Compliance at SNAP Applications Stage

FRAC and Project Vote, with the help of state anti-hunger advocates, reviewed the SNAP applications – both paper and, when offered and accessible, online – for states and the District of Columbia. Six states were not reviewed because they are exempt from the NVRA: Idaho, Minnesota, New Hampshire, North Dakota, Wisconsin, and Wyoming.³ In addition, North Carolina is currently in litigation with Project Vote regarding the NVRA and was omitted from this report. The review evaluated several key issues related to NVRA mandates. Below we list those issues and mention briefly why they are important.

³ The NVRA specifically excludes these six states because, as of August 1, 1994, these states had either no requirement for voter registration or allowed all voters to register and vote at the same time at all polling places. 52 U.S.C. § 20502(b). Although Minnesota is not reviewed in this report, because it is exempt from the NVRA, it is worth noting that it does voluntarily include voter registration in its SNAP paper application.

First, did the SNAP application mention voter registration at all?

WHY: It is important for voter registration to be mentioned in the actual SNAP application, without reliance on a separate NVRA-only process, because including the NVRA-required materials in the SNAP application itself makes it easier for applicant to register to vote and helps ensure that state agencies consistently comply with the law. Doing so makes voter registration services an automatic part of the SNAP application process without additional unnecessary steps by applicants (or agency employees).

If the SNAP application mentioned voter registration, the review continued to examine several details about what was included and how registration was presented.

Including the NVRA-required materials in the SNAP application itself is essential to ensure that the agencies consistently comply with the law.

Second, did the SNAP application use the required NVRA voter preference question (see the first item in section II above for the exact language of the question)?

WHY: The exact language required by the NVRA is important for several reasons. First, in asking the question about whether a person would like to register to vote “today,” it makes clear that voter registration is being offered at the time of the transaction. Second, by asking if individuals are registered “where they live now,” the question makes clear that voter registration records must be current. In most jurisdictions, an individual must update their voter registration to reflect their current address to have an unencumbered ability to vote.

Third, did the SNAP application include important disclosures (see the second item in section II above for the exact disclosure language)?

WHY: These disclosures provide important information to help applicants decide if they want to register to vote by making sure clients know that whether they apply to register to vote will not affect the amount of their SNAP benefits and that they can obtain assistance for completing their voter registration, or may do so in private, and that they have a right to file a complaint for unlawful interference.

Fourth, where is the NVRA information included in the SNAP application?

WHY: Locating the voter preference question and disclosures together and in a prominent place within the SNAP application is important for providing applicants with a meaningful opportunity to vote. Additionally, it is crucial that the NVRA information does not interfere with an applicant’s completion of the SNAP application; doing so facilitates both the application for benefits and the registration to vote.

Fifth, how are SNAP clients provided access to state voter registration applications? Were there adequate instructions?

WHY: Having an effective method to provide SNAP applicants access to an actual voter registration application is arguably the most important part of the voter registration opportunity provided.

Findings for State Paper SNAP Applications

The SNAP paper applications (i.e., those that could be accessed and printed from a state's SNAP website and then mailed to agencies or returned in person) that were examined were found to vary widely in the presentation of voter registration opportunities. Appendix A includes a table with detailed results for each state.

Finding #1: Of the 44 state paper SNAP applications reviewed, 16 did not mention voter registration at all.

Disappointingly, 16 states failed to include *any* information on voter registration in SNAP applications that could be downloaded and printed. While it is possible that the required voter registration services were provided at a different point in the application process other than in the application itself, omitting voter registration information from the application greatly increases chances for non-compliance and oversight. It is too easy for both applicants and agency staff members to forget or skip NRVA-related material if voter registration is a separate process.

Finding #2: Of the 28 states that included voter registration information in their paper SNAP applications, seven did not use the required NVRA voter preference question.

Twenty-one states used the correct wording of the voter preference question in the body of the SNAP application (see first item in section II above for the required language).

Four states used their own versions of the voter preference question, but not the specific language required by law. They asked:

- “Are you registered to vote where you live now?” (Tennessee)
- “Would you like to register to vote?” (Arkansas, Indiana)
- “Do you or anyone living with you who is 18 or older and a United States citizen and Massachusetts resident want to register to vote? If yes, would you like to register?” (Massachusetts)

Of these options, the one from Tennessee was the only one that incorporated information about the necessity that voter registration records need to be updated by asking if individuals are registered to vote where they are currently living. However, Tennessee's language did not actually convey that the opportunity to register to vote is being given.

Three other states included some statement about voter registration but did not include an actual voter preference question.

- California's application stated the following: “You have the right to get assistance from the County to register to vote.”
- The Illinois application had the following statement: “If you want to register to vote, fill out the enclosed Illinois Voter Registration Application (SBE R-19) and give it to your DHS office or your local election official.”
- Rhode Island's form simply stated: “If you are not registered to vote where you live now, complete the enclosed form.”

While these statements about voter registration are better than nothing, they are *not as effective as using the required voter preference question and they do not comply with the law.*

Finding #3: Of the 28 states that included voter registration information in paper SNAP applications, six did not include important disclosures.

The paper applications were reviewed to see if they included several important disclosures (i.e., stating that deciding to register to vote has no effect on benefits; offering assistance with voter registration as well as the right to complete the registration form in private; and providing information on how to lodge a complaint). These disclosures provide SNAP applicants with critical information necessary to inform their decision on whether to register to vote.

Twenty-two of the 28 applications that included some voter registration information at some point in the application provided these required disclosures verbatim – a best practice.

Five of the other six states included at least some of the required disclosures:

- Indiana and Oregon included only the disclosure language stating that the decision to register to vote would have no bearing on benefits.
- Illinois and Ohio included only the disclosure language about offering assistance with the voter registration application.
- Massachusetts included only two disclosures: registration will have no impact on benefits and assistance is available.

Finally, California’s statement, “You have the right to get assistance from the County to register to vote,” gives some guidance, but it is not instructive enough to constitute the required disclosure language, “If you would like help in filling out the voter registration application form, we will help you. The decision whether to seek or accept help is yours. You may fill out the application in private.”

Finding #4: Of the 28 states that included voter registration information in their paper SNAP applications, four did not place the voter registration question and disclosures together.

Most states followed the best practice of placing both the voter preference question and the disclosures together in the paper application in a location that would not be overlooked or interfere with the completion of the SNAP application.

Four states — Arkansas, Massachusetts, Nebraska, and Tennessee — separated the disclosures from the voter registration question. When the disclosures are given separately, the applicant does not have the opportunity to read all the relevant information when deciding whether to register to vote — undercutting the effectiveness of the disclosures. Knowing that registering to vote (or declining to do so) will not impact the SNAP benefit is just one example of a disclosure that may affect the way a person decides to answer the voter preference question.

Additionally, the placement of the voter registration information varied. Some states placed the information near the beginning of the SNAP application (e.g., Ohio) and some on the last page,

either before or after the signature line (e.g., Oregon). Either can constitute a best practice as long as the voter registration information is featured prominently and the voter registration information is not on a separate page, all by itself, independent from the rest of the SNAP application, making it easier to skip (like the Louisiana example, as opposed to the Pennsylvania example, described below in this report).

Arkansas' application provides another example of ill-advised placement of the voter preference question. In its SNAP application, the voter preference question follows this question: "Have you or any household member been found guilty of or pled guilty or nolo contendere (no contest) to a felony conviction involving the manufacture or distribution of a controlled substance?" Placing the voter preference question immediately after other questions individuals would prefer to say "no" to, such as their criminal history, is not a good practice because it encourages individuals to say "no" to the voter registration question as well.

Finding #5: Of the 44 state paper SNAP applications reviewed, 33 did not include a voter registration application.

The NVRA requires that voter registration applications be distributed to public assistance clients who do not decline voter registration services in writing. While there are many ways in which a SNAP agency can distribute voter registration applications, the best way is to include the voter registration application with the SNAP application so that distribution is accomplished whenever an applicant receives a SNAP application. In Alabama, Alaska, Arkansas, Hawaii, Illinois, Louisiana, Nevada, New Mexico, New York, Ohio, and Rhode Island, the SNAP application also included a state voter registration application.

When the state voter registration application — which is typically one or two pages — is inserted into all SNAP applications, including the downloadable SNAP application housed on the agency website, applicants will be able more readily to register to vote. For instance, if the client would like to complete the form and mail it before submitting their benefits application, they may do so. Likewise, if a client is going to meet with agency staff after working on their SNAP application and they have questions about registering to vote or need assistance with registering, they will know beforehand by having the registration form as a part of what they downloaded.

NOTE: Although not reviewed for this report, recertification or renewal forms and change of address forms used by SNAP agencies should also include voter registration services.

Examples of Best Practices in State Paper SNAP Applications

No state had a downloadable paper application for SNAP that included all the best practices related to NVRA compliance.

However, two states—Louisiana and Pennsylvania—provided good examples of how states can provide the required voter preference question and disclosures in their paper applications for SNAP. These application examples can be found in Appendix C. Notes highlighting both some best practices as well as areas for continued improvement for Louisiana and Pennsylvania are shown below.



Louisiana's Best Practices:

- A blank voter registration form is included.
- A toll-free number for assistance with voter registration is provided and an additional question about assistance is asked.
- All of the required NVRA language is correct.

Needs improvement:

- Should tell clients that they can also return their registration forms to agency offices.
- The language about signing with a mark could be clearer.
- The voter registration information is on a separate page by itself.

Pennsylvania's Best Practices:

- Provides a list of qualifications to vote.
- The required NVRA language is correct.
- The voter registration information is not on a separate page but incorporated into the application.
- Explains that the county office can provide assistance.

Needs improvement:

- Application should include a blank voter registration form.
- Would be better if voter registration did not immediately follow questions about criminal history.



Findings for State SNAP Online Applications

For this report, 37 state SNAP applications that could be completed and submitted online were reviewed.⁴ Appendix B includes a table with more detailed results for each state.⁵

Finding #6: Of the 37 state online SNAP applications reviewed, four did not mention voter registration at all.

Of the states covered in the report, the following four states have no mention of voter registration in the online application: Maine, Nebraska, New Jersey, and Rhode Island.

⁴ 44 states had online SNAP applications in 2016. Alaska, the District of Columbia, Georgia, Hawaii, Mississippi, Missouri, and Wyoming did not have online SNAP applications at the time of the review. Of the 44 states with online SNAP applications, only 37 were reviewed, for the following reasons: North Carolina, which has an online SNAP application, was omitted from this review due to ongoing litigation with Project Vote; Kentucky was omitted because the online portal could not be accessed; five of the six states not covered by the NVRA, Idaho, Minnesota, New Hampshire, North Dakota, and Wisconsin, all have online applications but these were not reviewed.

⁵ In many states, SNAP applications that can be submitted online are part of a combined social services application that allows individuals to simultaneously apply for programs in addition to SNAP, such as Medicaid and TANF.

These states would still be compliant with the NVRA if voter registration services were offered later in the application process (both New Jersey and Rhode Island provide voter registration later in the process).⁶ This, however, is not a recommended practice because, as explained in this report, if the NVRA voter registration services are provided as part of a separate document or process, there is a much stronger likelihood that they can be skipped or forgotten.

Finding #7: Of the 33 state online SNAP applications that included information on voter registration, only two included the exact wording of the mandatory voter preference question and 24 used language that was close.

Of the online SNAP applications reviewed, only two used the exact NVRA-required language for the voter preference question — Arizona and Arkansas. In addition, 24 states used language for the question that was very close or somewhat close to the required NVRA voter preference question.

However, seven states used language that did not come close. The following states used very poor variations of the question:

- Florida (“Register to vote or update your voter registration.”)
- Kansas (“Would you like to register to vote today?”)
- Maryland (“If you are not registered to vote, would you like to receive a voter registration form?”)
- Massachusetts (“Does anyone in this household want to register to vote?”)
- Utah (A link that says “Register to vote here”)
- Washington (Only includes a link in the footer of the application)
- West Virginia (“Is anyone in this household over the age of 18 interested in registering to vote?”)

These non-compliant phrases fail to convey significant information that is captured in the required language, including that it is important for clients to update their voter registration with their current address. Using the required question avoids confusion for clients as well as protects the agency from non-compliance with the NVRA. Particularly disconcerting are states like Utah and Washington that do not ask a question at all but only provide a link to the election official’s voter registration page.

⁶ There is no question about voter registration in the New Jersey online application but New Jersey Department of Human Services does provide NVRA complaint voter registration services as part of the SNAP application process as part of the follow-up interviews. See <http://www.projectvote.org/wp-content/uploads/NJ-Fully-Executed-Settlement-Agmt-2016.pdf>. The United States Department of Justice has an agreement with Rhode Island about compliance with Section 7 of the NVRA. See https://www.justice.gov/sites/default/files/crt/legacy/2011/03/30/ri_nvra_cd.pdf. Pursuant to this agreement, NVRA compliant voter registration services should be provided by the Rhode Island Department of Human Services at a later point in the application process.

Finding #8: Of the 33 state online SNAP applications that provided information on voter registration, 9 did not include any of the disclosures.

Of the 33 state online applications that asked clients to register to vote in some fashion, nine states — Florida, Illinois, Iowa, Maryland, Massachusetts,⁷ Utah, Vermont, Washington, and West Virginia — did not include any disclosures at all. Sixteen included all of the important disclosures reviewed in this report and eight included only some of these disclosures.

Of the 24 states that provided all or some of the reviewed disclosures, 23 state online applications included the NVRA-required language or nearly identical language that the decision to register to vote will not have any impact on the amount of benefits received. 19 state online applications provided the disclosure related to how to file a complaint and 17 included information on the availability of voter registration assistance.

But disturbingly, in addition to the nine states (referenced above) that did not include any of the disclosures, an additional seven states — Delaware, Kansas, New York, Ohio, Oregon, Tennessee, and Washington — failed to provide SNAP online applicants with any information about the fact that assistance to complete a voter registration application is available. While all the disclosures are important, it is particularly significant that individuals applying for SNAP online — who are unable to directly ask a caseworker in an office setting — are informed about assistance with registering to vote as well as an explanation of how to get this assistance.

During remote transactions, offering assistance can be as simple as providing a toll-free number. A few states do this, including Arkansas, California and Oklahoma.

Finding #9: Of the 33 state online SNAP applications that included information on voter registration, 10 did not provide any useful guidance on how to obtain a voter registration application.

One of the more disappointing findings of this report was the number of states that do a poor job providing actual access to voter registration applications. If a client does not decline voter registration services in writing, the NVRA requires distribution of a voter registration application.

⁷ In Massachusetts, the application process after the application is submitted includes an automatic voter registration mailer and an interview, during which the disclosures, including an offer of assistance with the voter registration application, are provided.

Of the 33 states with an online SNAP application that mentions voter registration, 10 applications provided no information about how clients could get a voter registration application: Connecticut, Louisiana, Maryland, Montana, New York, Pennsylvania,⁸ South Carolina, South Dakota, Texas, and Utah.⁹

Even when transactions between agencies and clients occur outside of face-to-face meetings, there are many ways to meaningfully distribute voter registration applications.

Even when transactions between agencies and their clients occur outside of face-to-face meetings, there are many ways to meaningfully distribute voter registration applications. Because not all applicants can readily print a voter registration form, or travel to an office, or use online voter registration, it is crucial that the state offer options to comply with the NVRA requirement to distribute voter registration forms. The best practice is for the online SNAP applications to provide three distribution options: 1) have

an option to request that a blank voter registration application be sent in the mail; 2) have a downloadable voter registration application within the SNAP application; and 3) if the state has an online voter registration system, provide a link to that system with an explanation of who can use the system (for example whether a driver's license is required.)

The online SNAP applications in only four states — Michigan, Nevada, Oklahoma, and Tennessee — follow these best practices of providing clients with an option to request that a voter registration application be mailed, providing a downloadable voter registration application, and in the case of Nevada, the only one of the four with online voter registration,

⁸ Pennsylvania automatically mails a voter registration application, after the SNAP application is submitted, to all who do not decline voter registration. Thus, SNAP applicants receive voter registration applications, but the process in Pennsylvania is not a best practice because the SNAP application does not explain that this is what happens. Automatically mailing voter registration applications to all clients who do not decline is only a best practice for achieving distribution if the SNAP application explains the process. If no explanation is provided, clients are left with no guidance about next steps to complete their registration. This is a problem because without more information clients often believe that by checking “Yes” when asked in a SNAP application if they want to register to vote that they have, in fact, registered to vote and are not looking out for the voter registration mailing. It is possible that additional states on this list also mail voter registration applications after SNAP applications are submitted but even if that is true, like Pennsylvania, none of these states provide an explanation of that next step, so while they may technically be complying with the NVRA requirement to distribute voter registration applications, they are not following best practices and are not effectively helping SNAP clients register to vote.

⁹ There is a link to Utah's election's page from the SNAP application, but it is extremely cumbersome and almost impossible to determine how to gain access to a voter registration application from this site. Unlike, for example, Washington State, which also provides voter registration only through a link directly from its SNAP application to its election page. Washington's election page is much more user friendly. Washington's voter registration page clearly explains who can use the online voter registration system and then gives clear additional options of downloading a voter registration form or asking that a voter registration form be sent in the mail.

providing a link to the online voter registration system. In these four states, all a client needs to do is check a box asking that the voter registration application be mailed to the household.¹⁰

While allowing clients to request that a voter registration application be sent in the mail is the best practice because it responds to a client's specific request for the voter registration application, some states automatically mail a voter registration application to every client or at least every client who indicates an interest in registering to vote during their online SNAP application. If a state chooses this method, the SNAP online application should explain to clients that a voter registration application will be sent automatically in the mail. The online SNAP applications of Florida, Indiana, and Massachusetts follow this practice.

Another important best practice for online applications is to design them so the completion of the SNAP and voter registration applications do not interfere with one another. For instance, if clicking the "registration to vote" link in the middle of completing the SNAP applications takes SNAP applicants to a new webpage (e.g., the state voter registration website), this could impede their ability to complete the SNAP application. Michigan solves this problem by placing the voter registration information in the SNAP application, not separately, and explains that if a client is interested in registering to vote, information will be provided for accessing voter registration after the SNAP application is submitted.

Finding #10: Of the 33 state online SNAP applications that included information on voter registration, 24 have online voter registration. Of these states with online voter registration, nine states failed to connect SNAP applicants to the state's online voter registration site.

Any state with online voter registration should adopt the best practice of including a link to online voter registration in its online SNAP application, along with an explanation of who can use the online voter registration system. For those able to use online voter registration, it is the best option because it allows a client to avoid the extra steps of receiving and mailing in a voter registration application.

There are, however, important caveats about relying on online voter registration.

Almost all states' online voter registration systems can only be used by an individual with a driver's license or state ID card.^{xxi} Concern about low-income individuals not having driver's licenses *is one reason why* the NVRA requires voter registration services for public assistance clients. As indicated in the original legislative history on the NVRA, the "agency-based registration program is designed to reach out to those sectors of the population which are not

While linking SNAP applicants to the online voter registration system is critical, this cannot be the only way the SNAP agency connects applicants to a voter registration.

¹⁰ In the Arkansas online SNAP application clients can request a voter registration application in the mail, but must take an extra step of calling to request the mailing rather than the preferred method where clients simply check a box to request the form be mailed.

likely to have driver's licenses or other identification cards issued by a motor vehicle agency."^{xxii} Therefore, while linking SNAP applicants to the online voter registration system is critical, this *cannot be* the only way the SNAP agency connects applicants to a voter registration application (as explained above, an option to request a voter registration application in the mail should always be provided).

Disappointingly, nine of the states with online state SNAP applications and online voter registration systems — Connecticut, Indiana, Louisiana, Maryland, Massachusetts, New York, Pennsylvania,¹¹ South Carolina, and West Virginia — failed to connect SNAP clients to the online voter registration system.

Moreover, when states connected SNAP applicants to the online voter registration site, too often the interface did not provide sufficient instructions on what applicants would need to register online and who can use the online voter registration system, undermining the purpose of the NVRA. For example, in Iowa and Utah, you must have a state driver's license or ID card to use the online voter registration system. The online SNAP applications in these states, however, did not provide any explanation of who can use the online voter registration system nor do they provide any of the NVRA disclosure statements. Instead, a hyperlink with text — “click here if you want to register to vote” — was all that was given. The link then takes clients to a different webpage. Such practices can disrupt a client's completion of their SNAP application.

To comply with best practices in connecting SNAP applicants to the state's online voter registration site, a state needs to provide clear guidance to SNAP clients about who can and cannot use the online voter registration system. This is the case in Colorado, Illinois, Nevada, and Oregon. (California does not provide additional information to SNAP clients about the online system, but this is not as problematic because California's is one of the few systems that anybody can use, even without a state driver's license or ID card to register online. While Washington's online SNAP application also does not provide any of the required NVRA language and just links to the state's online voter registration site, at least the online voter registration system provides guidance on how to register to vote and an option to request voter registration in the mail for people who cannot use the system.)

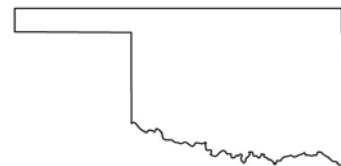
¹¹ Pennsylvania's failure in this regard is particularly disappointing because they have such an excellent online voter registration system that can be used by any individuals who do not have a signature on file with the DMV. See <https://www.pavoterservices.state.pa.us/pages/VoterRegistrationApplication.aspx>. Pennsylvania's online voter registration is recent, only in place for a little over a year. Hopefully the state will correct this oversight in the near future.

Examples of Best Practices in State Online SNAP Applications

No state had an online application that included all the best practices related to NVRA compliance. Two state online SNAP applications — Michigan and Oklahoma — provided excellent examples of how states communicated the required voter preference question and disclosures. These examples can be found in Appendix D, and notes highlighting some best practices are shown below:

Oklahoma's Best Practices:

- Explains how printable registration form will be provided.
- Allows the clients to request voter registration form in mail.
- All the required NVRA language is correct.
- Explains how to get assistance.
- Voter registration is part of the application but does not disrupt the SNAP application.



Michigan's Best Practices:

- Explains that voter registration form will be sent through the mail and gives option of downloading immediately.
- Provides telephone number for assistance.
- Explains where to mail completed voter registration forms and that completed forms can be returned to local county office.
- All the required NVRA language is correct.

IV. Summary: Best Practices for State Paper and Online SNAP Applications

From the review of state SNAP applications, and from the experience of the authors and other experts, the following best practices emerged. As discussed, the most important practice is that the voter registration information should be incorporated into the SNAP application itself so that voter registration services are automatically part of the SNAP application process, without additional steps. As the survey results show, while most of the online SNAP applications – but not all – do follow this practice, only ten of the reviewed paper applications included the voter registration forms. But as the survey results also show, none of the SNAP applications incorporate all of the NVRA practices addressed here, and therefore state SNAP agencies are missing an opportunity to provide low-income citizens with a more meaningful opportunity to register to vote.

Best Practices for Both Paper and Online Applications

- Use the required language for the voter registration preference question.

- Use the required language for the disclosures.
- Bundle the voter preference question and disclosures together in the application.
- Ensure that the voter registration information is included in a prominent place in the SNAP application, but does not interfere with the completion of the SNAP application.
- Do not place the voter registration information after a list of questions about disqualifications from SNAP.
- Indicate to applicants that the NVRA-required preference question should be answered (Maryland does this by providing an asterisk for all of the important questions, including the voter registration preference question).
- Provide a list of qualifications needed to register to vote so that all SNAP applicants understand that you must be a U.S. citizen to vote (e.g., Pennsylvania is an example of this best practice).
- Provide a separate question about assistance with voter registration, to emphasize that assistance is available.
- Provide a toll-free number for where to obtain assistance (e.g., Louisiana is an example of this best practice) because SNAP applications are not always completed in the SNAP state agency office.
- Inform clients that they can return completed voter registration applications to the SNAP agency offices in addition to mailing them to election officials.
- Provide clients with pre-paid postage voter registration applications so they can more easily return their completed applications directly to election officials. (The rate of return on any voter registration mailing greatly increases if postage for the return mail is provided).

Best Practices for Paper Applications

- Ensure that the voter registration information is not on a separate page in the application but is incorporated into the body of the application. A separate page for the voter registration information should be avoided because a separate page can be skipped over easily (e.g., Pennsylvania is an example of this best practice).
- Include an actual pre-paid postage voter registration application with the SNAP application or application packet.

Best Practices for Online Applications

- Provide access to a voter registration application through several methods to encourage the likelihood that clients will return completed voter registration applications. The options should include *all* of the following:
 - Provide an opportunity for clients to request a voter registration application be sent to them in the mail.
 - Provide an opportunity to print out the voter registration application immediately from the SNAP application itself.
 - In states that allow for online voter registration, include a link to the state's online voter registration system *and* explain to clients before sending them to that system if it can only be used by individuals with a state ID card or a driver's license (Nevada is an example of this best practice).

- Another option is automatically mailing a voter registration application to every client who does not indicate they do not want to register to vote. It is important that if this is the approach taken, clients must be informed within the SNAP application about the mailing.
- Include a discussion of voter registration in additional places on the application website, such as the landing page for the start of the application or on a pop-up side bar.

V. Next Steps for Anti-Hunger Advocates

Advocacy is needed to help ensure that more low-income citizens have their rights protected and are registering to vote at SNAP agencies. Too many state SNAP applications are not offering *any* information on voter registration opportunities; too many others are not complying with elements of the law; and none comply with all the best practices. A critical entry point for connecting more low-income Americans with the right to vote is being ignored.

Outlined here are ways that anti-hunger advocates can take action to help ensure that the SNAP applications used in their state comply with NVRA best practices:

Step 1: Review your state’s paper and online SNAP applications for NVRA compliance and best practices using the information contained in this report.

Step 2: Work with your state SNAP agency to improve the SNAP application by pushing for compliance with NVRA best practices (share the examples of the model applications from other states to show your state agency what is possible).

Step 3: Reach out to state voter registration coalitions and FRAC for assistance or to share the results of your work.

Other Opportunities for Anti-Hunger Advocates

Beyond improving the SNAP application to reflect NVRA best practices, there are many other effective strategies that anti-hunger advocates can take to help improve the NVRA compliance of the government agencies that work with low-income clients. Because of the assistance that anti-hunger advocates provide state governments with the administration of programs, such as SNAP and WIC, these advocates often have an effective relationship of trust with the government agency staff and are in a prime position to advocate effectively.

While in some circumstances, state government agencies are hostile to the NVRA and not interested in improving compliance, all too often compliance with the NVRA simply falls off the radar.

Thus, advocacy can make a large difference. For instance, simply asking about the NVRA and the agencies' processes for offering clients' voter registration can serve as a reminder about this obligation. However, persistence may be required to effect meaningful change. By educating anti-hunger organizations and staff about the importance of the NVRA and its requirements, advocates can be prepared to raise voter registration opportunities and concerns during their regular discussions with agency personnel or by requesting a special meeting on the NVRA.

Here are key topics to raise with public assistance agencies:

- What type of *voter registration services* do clients receive?
- What type of *training do staff receive* about the NVRA? When was the last training and how often are trainings offered? (Regular training to remind staff of their NVRA responsibilities goes a long way to helping improve NVRA compliance.)
- Does the state and each office or county have a staff member who is the *NVRA coordinator*? If so, ask for the person's name and meet with him or her regularly to check on the status of NVRA compliance.
 - If not, ask for an appointment with a coordinator, who among other things, should be familiar with the requirements of the NVRA, and should be responsible for coordinating and overseeing compliance with the NVRA within the agency. An NVRA coordinator should also help ensure that the agency conducts regular NVRA training for the staff.
- What type of monitoring does the agency conduct to ensure that staff is offering voter registration to every client?
- Does the agency evaluate workers based on NVRA compliance? Most caseworkers and front-line workers are already evaluated on a regular basis through either audits of case files or occasional observation of interactions with clients. These reviews usually are based on a guidance document, like a checklist. It is easy to add an item about NVRA compliance to this process. Neglect is the most common reason for a lack of NVRA compliance. Incorporating a check on NVRA compliance into the regular evaluation process serves as a reminder about this important obligation.

Consider asking the agency and/or the state's Chief Election Officer (usually the Secretary of State) to *conduct a NVRA compliance review* and report back findings. The review should:

- assess all in-office processes to make sure that voter registration is actually being offered to clients whenever they apply for SNAP, renew/recertify their benefits, or report a change of address;
- ensure that all public assistance agency offices actually have voter registration applications available in the offices to distribute to clients, and that there is a process by which offices can ask for more voter registration applications as needed (the office NVRA coordinator should be tasked with this);
- evaluate all online processes to make sure that the required opportunity to register to vote is always offered.

In addition to confirming that NVRA compliance is addressed in your regular discussions with agency personnel, through a more formal meeting, or during a compliance review, anti-hunger advocates can help with NVRA compliance by:

- visiting an agency office to conduct a review of relevant voter registration processes (follow up by sending a letter, requesting a meeting, or doing both with the state agency to discuss findings and areas of concern, and suggest best practices);
- promoting Project Vote's *Section 7 of the National Voter Registration Act: A Toolkit for Public Agency Compliance* <http://www.projectvote.org/wp-content/uploads/2014/09/SECTION-7-TOOLKIT-September-2014.pdf>, which provides suggestions for how agencies can work to comply with the NVRA.

VI. Conclusion

The NVRA can be an important tool in addressing the voter registration gap between lower-income and higher income citizens who are eligible to vote, and anti-hunger groups have the opportunity to play an important role in ensuring that this important civil rights law is implemented correctly.

The states that offered voter registration in downloaded paper and online SNAP applications varied greatly in compliance with the NVRA and best practices. While no state application — either downloaded or online — incorporated all the recommended NVRA voter registration best practices, many state applications included key elements.

Anti-hunger groups are natural — albeit often overlooked — allies to this work. Anti-hunger advocates have deep ties with SNAP agency officials at the federal, state, and county level, and with low-income and disproportionately unregistered citizens who benefit from the SNAP program. Leveraging these assets, the anti-hunger network could support work to improve voter registration practices by public assistance agencies.

By highlighting how simple and cost-effective changes in SNAP applications can connect more low-income Americans to register to vote, this report provides initial steps on how anti-hunger advocates can help support NVRA compliance at SNAP state agencies.

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See Project Vote's website at: <http://www.projectvote.org/issues/government-agency-registration/public-assistance-agencies/>

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- ⁱ Calculations made using the Census Bureau's Current Population Survey November Supplement for 2000, 2004, 2008 and 2012, <http://www.census.gov/programs-surveys/cps.html>.
- ⁱⁱ See n.1.
- ⁱⁱⁱ 52 U.S.C. § 20501, et seq.
- ^{iv} Presidential Commission on Election Administration. 2014. "The American Voting Experience: Report and Recommendations of the Presidential Commission on Election Administration." <http://electionlawblog.org/wp-content/uploads/pcea-final-report.pdf>.
- ^v Department of Justice, Civil Rights Division. Updated Sept 1, 2016. "The National Voter Registration Act of 1993 (NVRA): Questions and Answers, Question # 13" Available at http://justice.gov/crt/about/vot/nvra/nvra_faq.php.
- ^{vi} 52 U.S.C. § 20501 (a) and (b).
- ^{vii} See supra n. 4
- ^{viii} United States Department of Agriculture, Food and Nutrition Service, National Data Bank, Public Use Version 8.2. Available from United States Department of Agriculture, Food and Nutrition Service, Alexandria, Virginia.
- ^{ix} United States Election Assistance Commission. 2013. "The Impact of the National Voter Registration Act of 1993 on the Administration of Elections for Federal Office 2011–2012," at Table 2a. United States Election Assistance Commission. 2015. "The 2014 EAC Election Administration and Voting Survey Comprehensive Report," at Table 2a. Available at <https://www.eac.gov/voters/national-voter-registration-act-studies/> (last visited March 14, 2017).
- ^x Missouri Department of Social Services, February 2016, National Voter Registration Act Report—Family Support Division, available at <https://dss.mo.gov/re/nvra/index.htm>
- ^{xi} Project Vote, 2014 "Voter Registration at Public Assistance Agencies", available at <http://www.projectvote.org/wp-content/uploads/2014/02/POLICY-PAPER-PUBLIC-AGENCY-REGISTRATION-FEB-2014.pdf>
- ^{xii} See, e.g., *Georgia State Conference of NAACP v. Kemp*, 841 F.Supp.2d 1320, 1329 (N.D. Ga. Jan. 30, 2012) (holding that voter registrations must be provided during remote transactions); *The National Voter Registration Act of 1993 (NVRA): Questions and Answers*, Department of Justice, http://www.justice.gov/crt/about/vot/nvra/nvra_faq.php (last visited September 3, 2016) (Question #24, "Many Section 7 designated agencies/offices routinely provide services/assistance such as application for, or renewal of, services or change-of-address notification through the internet, by telephone, or by mail. States should ensure the availability of voter-registration opportunities to individuals using such remote service/assistance opportunities from designated agencies.").
- ^{xiii} 52 U.S.C. § 20506(a)(6)(B).
- ^{xiv} 52 U.S.C. § 20506(a)(6)(B).
- ^{xv} *Id.*
- ^{xvi} *Id.*
- ^{xvii} 52 U.S.C. § 20506(a)(6)(A).
- ^{xviii} 52 U.S.C. § 20506(a)(6)(C).
- ^{xix} 52 U.S.C § 20506(d).
- ^{xx} See, e.g., Voting Section Litigation, Department of Justice (Feb. 15, 2017), <https://www.justice.gov/crt/voting-section-litigation>; Public Assistance Agencies, Project Vote (last visited Feb 27, 2017), <http://www.projectvote.org/issues/government-agency-registration/public-assistance-agencies/>.
- ^{xxi} See Online Registration, Project Vote (last checked February 27, 2017), <http://www.projectvote.org/issues/voter-registration-policy/online-registration/>.
- ^{xxii} S. REP. 103-6, S. REP. 103-6 (1993) at 14; S. REP. 103-6, S. REP. 103-6 (1993) at 14.
- ^{xxiii} S. REP. 103-6, S. REP. 103-6 (1993) at 14; S. REP. 103-6, S. REP. 103-6 (1993) at 14.

Appendix A: Paper Application Review Chart

State	Voter Preference Question	Disclosures				Actual Voter Registration Form Included?
		No effect on benefits	Assistance Proffered	Complaint Info	Question and disclosures together	
<u>AL</u>	Required Question	Yes	Yes	Yes	Yes	Yes (has NVRA footer)
<u>AK</u>	Required Question	Yes	Yes	Yes	Yes	Yes (has NVRA footer)
<u>AZ</u>	Required Question	Yes	Yes	Yes	Yes	No
<u>AR</u>	Would you like to register to vote? Yes; No.	Yes	Yes	Yes	No	Yes
<u>CA</u>	You have the right to get assistance from the County to register to vote	No	No	No	N/A	No
<u>CO</u>	No mention of voter registration					
<u>CT</u>	Required Question	Yes	Yes	Yes	Yes	No
<u>DE</u>	No mention of voter registration					
<u>DC</u>	No mention of voter registration					
<u>FL</u>	Required Question	Yes	Yes	Yes	Yes	No
<u>GA</u>	No mention of voter registration					
<u>HI</u>	Required Question	Yes	Yes	Yes	Yes	Yes

State	Voter Preference Question	Disclosures			Question and disclosures together	Actual Voter Registration Form Included?
		No effect on benefits	Assistance Proffered	Complaint Info		
<u>IL</u>	If you want to register to vote, fill out the enclosed Illinois Voter Registration Application (SBE R-19) and give it to your DHS office or your local election official.	No	Yes	No	Yes	Yes
<u>IN</u>	Do you want to register to vote?	Yes	No	No	Yes	No
<u>IA</u>	No mention of voter registration					
<u>KS</u>	Required Question	Yes	Yes	Yes	Yes	No
<u>KY</u>	No mention of voter registration					
<u>LA</u>	Required Question	Yes	Yes	Yes	Yes	Yes
<u>ME</u>	No mention of voter registration					
<u>MD</u>	No mention of voter registration					
<u>MA</u>	Do you or anyone living with you who is 18 or older and a United States citizen and Massachusetts resident want to register to vote? Yes; No. If yes, who would like to register?	Yes	Yes	No	No	No
<u>MI</u>	Required Question	Yes	Yes	Yes	Yes	No
<u>MS</u>	No mention of voter registration					

State	Voter Preference Question	Disclosures			Question and disclosures together	Actual Voter Registration Form Included?
		No effect on benefits	Assistance Proffered	Complaint Info		
<u>MO</u>	No mention of voter registration					
<u>MT</u>	Required Question	Yes	Yes	Yes	Yes	No
<u>NE</u>	Required Question	Yes	Yes	Yes	No	No
<u>NV</u>	Required Question	Yes	Yes	Yes	Yes	Yes
<u>NJ</u>	No mention of voter registration					
<u>NM</u>	Required Question	Yes	Yes	Yes	Yes	Yes
<u>NY</u>	Required Question	Yes	Yes	Yes	Yes	Yes
<u>OH</u>	Required Question	No	Yes	No	Yes	Yes
<u>OK</u>	No mention of voter registration					
<u>OR</u>	Required Question	Yes	No	No	Yes	No
<u>PA</u>	Required Question	Yes	Yes	Yes	Yes	No
<u>RI</u>	If you are not registered to vote where you live today, complete the enclosed form.	Yes	Yes	Yes	Yes	Yes
<u>SC</u>	No mention of voter registration					
<u>SD</u>	Required Question	Yes	Yes	Yes	Yes	No

State	Voter Preference Question	Disclosures			Question and disclosures together	Actual Voter Registration Form Included?
		No effect on benefits	Assistance Proffered	Complaint Info		
<u>TN</u>	Are you registered to vote where you live now? Yes; No.	Yes	Yes	Yes	No	No
<u>TX</u>	Required Question	Yes	Yes	Yes	Yes	No
<u>UT</u>	Required Question	Yes	Yes	Yes	Yes	No
<u>VT</u>	No mention of voter registration					
<u>VA</u>	Required Question	Yes	Yes	Yes	Yes	No
<u>WA</u>	No mention of voter registration					
<u>WV</u>	No mention of voter registration					
* Idaho, Minnesota, New Hampshire, North Dakota, Wisconsin, and Wyoming are exempt from the NVRA. North Carolina is currently in litigation with Project Vote, and was therefore excluded.						

NOTE: For purposes of this review, state paper SNAP applications were downloaded from the state SNAP agency's website in the summer of 2016.

Appendix B: Online Application Review Chart

State	Voter Preference Question	Disclosures				Does SNAP application link to online voter registration?
		No effect on benefits	Assistance Proffered	Complaint Info	Instructions on how to obtain a voter registration application	
<u>AL</u>	Very Close	Yes	Very Close	Yes	Yes	Yes
<u>AZ</u>	Required Question	Yes	Yes	Yes	Links to the election website	Yes, but there is no explanation of who can use the online VR system
<u>AR</u>	Required Question	Yes	Yes	Very Close	Yes, but must call to request having VR application mailed	State does not have online voter registration
<u>CA</u>	Very Close	Yes	Yes	Yes	Provides guidance on how to get a VR form after the SNAP application is submitted	Yes, it is provided after clients submit SNAP application
<u>CO</u>	Very Close	Very Close	Very Close	No	Yes, but does not include an option to request VR application in the mail	Yes
<u>CT</u>	Very Close	Yes	Yes	Yes	No	No
<u>DE</u>	Very Close	Very Close	No	Yes	There is a pop-up screen to the online VR system; there is no option to request a mail form	Yes, but there is no explanation that individuals without driver's licenses need to print out application at the end of the process

State	Voter Preference Question	Disclosures			Instructions on how to obtain a voter registration application	Does SNAP application link to online voter registration?
		No effect on benefits	Assistance Proffered	Complaint Info		
<u>FL</u>	Register to vote or update your voter registration	No	No	No	Yes	State's online voter registration system is not operational yet
<u>IL</u>	Close	No	No	No	Links to the election website	Yes – there is a link; no explanation provided on SNAP application but good assistance provided by online VR system
<u>IN</u>	Very Close	Yes	No	No	Yes, tells everyone that voter registration applications automatically mailed and available at agency offices	No
<u>IA</u>	Close	No	No	No	Yes	Yes - there is a link but no explanation provided as part of the SNAP that individuals without driver's license cannot use the online VR system
<u>KS</u>	Would you like to register to vote today? Yes No	Yes	No	No	Yes, explains that a pop-up screen directing you to the VR link provided after the SNAP application is submitted	Yes

State	Voter Preference Question	Disclosures			Instructions on how to obtain a voter registration application	Does SNAP application link to online voter registration?
		No effect on benefits	Assistance Proffered	Complaint Info		
LA	Very Close	Yes	Very Close	Yes	No	No
ME	No mention of voter registration					State does not have online voter registration
MD	If you are not registered to vote, would you like to receive a voter registration form?	No	No	No	Asks if you want a form - if you indicate yes there is no explanation of what happens next	No
MA	Does anyone in this household want to register to vote?	No	No	No	Yes, provides a pdf to be downloaded and explains a VR will be sent by mail	No
MI	Very Close	Yes	Yes	Yes	Yes, includes option to request VR application in the mail	State does not have online voter registration
MT	Very Close	Yes	Yes	Yes	No	State does not have online voter registration
NE	No mention of voter registration					No
NV	Very Close	Yes	Yes	Yes	Yes, includes option to request VR application in the mail	Yes, both link and explanation are provided

State	Voter Preference Question	Disclosures			Instructions on how to obtain a voter registration application	Does SNAP application link to online voter registration?
		No effect on benefits	Assistance Proffered	Complaint Info		
NJ	No mention of voter registration					State does not have online voter registration
NM	Very Close	Yes	Yes	Yes	Yes, there is link is to online VR system, but no explanation is provided	Yes, but does not include an option to request VR application in the mail
NY	Very Close	No	No	Yes	No	No
OH	Very Close	Yes	No	No	Yes, but does not include an option to request VR application in the mail	Online voter registration system was not operational when the online SNAP application was reviewed
OK	Very Close	Yes	Yes	Yes	Yes, includes option to request VR application in the mail	Online voter registration system was not operational when the online SNAP application was reviewed
OR	Very Close	Yes	No	No	There is link to SOS VR webpage, but there is no option to request VR application in the mail; a possibility to download the VR form	Yes

State	Voter Preference Question	Disclosures			Instructions on how to obtain a voter registration application	Does SNAP application link to online voter registration?
		No effect on benefits	Assistance Proffered	Complaint Info		
PA	Very Close	Yes	Yes	Yes	No, the system automatically mails voter registration applications	No
RI	No mention of voter registration					No
SC	Very Close	Yes	Yes	Very Close	No	No
SD	Very Close	Very Close	Yes	Very Close	No	State does not have online voter registration
TN	Very Close	Very Close	No	Very Close	Yes, includes option to request VR application in the mail	Online voter registration system was not operational when the online SNAP application was reviewed
TX	Very Close	Yes	Yes	Yes	No	State does not have online voter registration
UT	There is no question – just click here to register to vote	No	No	No	There is a link to election officials voting page but not very clear that this is what is provided	Yes, but there is no explanation in the SNAP application that the online voter registration system can only be used by individuals with driver's license or state ID card; and the state VR page itself is hard to understand

State	Voter Preference Question	Disclosures			Instructions on how to obtain a voter registration application	Does SNAP application link to online voter registration ?
		No effect on benefits	Assistance Proffered	Complaint Info		
VT	Very Close	No	No	No	There is nothing in the SNAP application but a link to the state online voter registration system	Yes, but there is no explanation in the SNAP application that the online voter registration system can only be used by individuals with driver's license or state ID car
VA	Very Close	Yes	Yes	Yes	Yes, but does not include an option to request VR application in the mail	Yes, there is link to online VR system, but no explanation is provided
WA	None. The voter registration offer is just a link in the footer of the application	No	No	No	There is nothing in the SNAP application but a link to the SOS voter registration page; but the SOS VR page is very easier friendly and includes an option to request VR in the mail	Yes, there is link to online VR system but there is no explanation in the SNAP application that the online voter registration system can only be used by individuals with driver's license or state ID card
WV	Is anyone in the household over the age of 18 interested in registering to vote? (Required)	No	No	No	Yes, to download PDF but no option to request that a voter registration be mailed	No

*44 states had online SNAP applications in 2016. Alaska, the District of Columbia, Georgia, Hawaii, Mississippi, Missouri, and Wyoming did not have online SNAP applications at the time of the review. Of the 44 states with online SNAP applications, only 37 were reviewed, for the following reasons: North Carolina, which has an online SNAP application, was omitted from this review due to ongoing litigation with Project Vote; Kentucky was omitted because the online portal could not be accessed; five of the six states not covered by the NVRA, Idaho, Minnesota, New Hampshire, North Dakota, and Wisconsin, all have online applications but these were not reviewed.

NOTE: For purposes of this review, online applications were accessed in the summer and fall of 2016.

Appendix C: Paper Application Examples

Louisiana

Voter Registration

If you are not registered to vote where you live now, would you like to apply to register to vote here today? (Check one)

I want to register to vote. I do not want to register to vote.

IF YOU DO NOT CHECK EITHER BOX, YOU WILL BE CONSIDERED TO HAVE DECIDED NOT TO REGISTER TO VOTE AT THIS TIME.

Applying to register or declining to register to vote **will not** affect the amount of assistance that you will be provided by this agency. Voter eligibility requirements are found on the voter registration application form.

Note: If you do register to vote, the location where your application was submitted will remain confidential. If you decline to register to vote, this fact will remain confidential. Applying to register or declining to register to vote will be used **only** for voter registration purposes.

If you would like help in filling out the voter registration application form, we will help you. The decision whether to seek or accept help is yours. You may fill out the application form in private. (Check one)

Yes, I would like help. No, I do not want help.

For assistance in completing the voter registration application form outside our office, contact the Department of Children and Family Services at 1-888-LAHELPU or 1-888-524-3578.

If completed outside our office, this declaration form and your completed voter registration application form (if you filled one out) should be returned to the DCFS ES Document Processing Center at P.O. Box 260031, Baton Rouge, LA 70826-9918.

Signature or Mark	Name Typed or Printed	Date
Signatures of Two Witnesses If Signed With Mark:		
1) _____	2) _____	

COMPLAINTS

If you believe that someone has interfered with your right to register or to decline to register to vote, your right to privacy in deciding whether to register or in applying to register to vote, or your right to choose your own political party or other political preference, you may file a complaint with the Louisiana Secretary of State, Commissioner of Elections, P.O. Box 94125, Baton Rouge, LA 70804-9125 or by calling (225) 922-0900 or 1-800-883-2805.

Best Practices:

- A blank voter registration form is included.
- A toll-free number for assistance with voter registration is provided and an additional question about assistance is asked.
- All of the required NVRA language is correct.

Needs improvement:

- Should tell clients that they can also return their registration forms to agency offices.
- The language about signing with a mark could be clearer.
- The voter registration information is on a separate page by itself.

Pennsylvania

Criminal history inquiry: You do not need to answer these questions if you are applying only for health care.		
Please answer the following questions for yourself and anyone else for whom you are applying:		
Does anyone have a summons or warrant to appear as a defendant at a criminal court proceeding?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, who?
Does anyone owe fines, costs or restitution for a felony or misdemeanor offense?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, who?
Does anyone have a payment plan for fines and costs?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, who?
Is anyone on probation or parole?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, who?
Has anyone been convicted of welfare fraud?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, who?
Is anyone fleeing from law enforcement?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, who?

Voter Registration (Optional)		
If you are not registered to vote where you live now, would you like to apply to register to vote here today? <input type="checkbox"/> Yes <input type="checkbox"/> No		
IF YOU DO NOT CHECK EITHER BOX, YOU WILL BE CONSIDERED TO HAVE DECIDED NOT TO REGISTER TO VOTE AT THIS TIME.		
To register, you must: 1) Be at least 18 on the day of the next election; 2) Be a citizen of the United States for at least one month PRIOR TO THE NEXT ELECTION; 3) Reside in Pennsylvania and the voting district at least 30 days prior to the next election.		
Applying to register or declining to register to vote will not affect the amount of assistance you will be provided by this agency. If you would like help filling out the voter registration application form, we will help you. The decision whether to seek or accept help is yours. You may fill out the application form in private. Please contact the county assistance office if you would like help. If you believe that someone has interfered with your right to register or to decline to register to vote, your right to privacy in deciding whether to register or in applying to register to vote, or your right to choose your own political party or other political preference, you may file a complaint with the Secretary of the Commonwealth, PA Department of State, Harrisburg, PA 17120. (Toll-free telephone number 1-877-VOTESPA.)		
COUNTY ASSISTANCE OFFICE STAFF WILL COMPLETE THIS BOX BASED UPON YOUR RESPONSE ABOVE		
<input type="checkbox"/> Given to Client ___/___/___	<input type="checkbox"/> Sent to voter registration ___/___/___	<input type="checkbox"/> Mailed to Client ___/___/___
<input type="checkbox"/> Declined, not interested ___/___/___	<input type="checkbox"/> Not a U.S. citizen ___/___/___	<input type="checkbox"/> Declined, already registered ___/___/___

CAO USE ONLY		
1. <input type="checkbox"/> Yes <input type="checkbox"/> No	Is anyone in the application group receiving SNAP and not living in a certified shelter for battered women and children?	EXPEDITED REVIEW Initials: _____ Date: _____
2. <input type="checkbox"/> Yes <input type="checkbox"/> No	Is there any postponed verification from a previous expedited issuance that the household must provide?	
3. <input type="checkbox"/> Yes <input type="checkbox"/> No	Are the household liquid resources equal to or less than \$100?	<input type="checkbox"/> Eligible <input type="checkbox"/> Denied - CLIENT NOTIFIED
4. <input type="checkbox"/> Yes <input type="checkbox"/> No	Is the countable monthly gross income less than \$150?	
5. <input type="checkbox"/> Yes <input type="checkbox"/> No	Is this a migrant or seasonal farm worker household?	Reason for denial:
6. <input type="checkbox"/> Yes <input type="checkbox"/> No	Is the household destitute?	
7. <input type="checkbox"/> Yes <input type="checkbox"/> No	Are combined monthly gross income and liquid resources less than monthly shelter expenses?	
		REGISTERED FOR CATEGORIES <input type="checkbox"/>



Best Practices:

- Provides a list of qualifications to vote.
- The required NVRA language is correct.
- The voter registration information is not on a separate page but incorporated into the application.
- Explains that the county office can provide assistance.

Needs Improvement:

- Application should include a blank voter registration form.
- Would be better if voter registration did not immediately follow questions about criminal history.

Appendix D: Online Application Examples Oklahoma

Voter Registration

* If you are not registered to vote where you live now, would you like to apply to register to vote?

- Yes
 No

If you click "Yes" a registration form will be mailed to you. To view this application online and print, you can click [here](#).

Completed Voter Registration Application(s) can be mailed to:

Oklahoma State Election Board
P.O. Box 528800
Oklahoma City, OK 73152-8800

Or send the completed application to your local Department of Human Services office, and they will mail the application for you.

Applying to register or declining to vote will not effect the amount of assistance that you will be provided, or your eligibility.

If you would like help in filling out the voter registration application, you can call toll free 1-877-659-4798. The decision whether to seek or accept help is yours. You may also fill out the application in private.

If you believe that someone has interfered with your right to register or to decline to register to vote, or your right to privacy in deciding whether to register; you may file a complaint with the:

Oklahoma State Election Board
P.O. Box 53156
Oklahoma City,
OK 73152

or call 405-521-2391

Best Practices:

- Explains how printable registration form will be provided.
- Allows the clients to request voter registration form in mail.
- All the required NVRA language is correct.
- Explains how to get assistance.
- Voter registration is part of the application but does not disrupt the SNAP application.

Michigan

Authorized Representative Signature

If you are eligible for food assistance and you want someone else to have a Bridge card and access to your food benefits to shop for you, please indicate their name here. This person will be your authorized representative.

First Name : Middle Initial : Last Name :

Offer of State of Michigan Voter Registration Application

* If you are not registered to vote where you live now, would you like to apply to register to vote here today?

- Yes, I would like a printable voter registration application form. If you select this option, a printable voter registration application form will be provided at the end of the benefits application process.
- Yes, I would like a voter registration application form to be mailed to me.
- No, I decline a voter registration application form.

Checking yes does not register you to vote.

You may also ask your worker for a voter registration application form at any time. DHS will assist you with completion of the voter registration application form (unless you decline such assistance) and submit your completed voter registration application form to the appropriate elections officials. If you experience any problems, please click Help on the next page.

Applying or declining to register to vote will not affect the amount of assistance that you will be provided by this department. If you would like help filling out the voter registration application form, we will help you. The decision whether to seek or accept help is yours. You may fill out the voter registration application form in private.

If you believe that someone has interfered with your right to register or to decline to register to vote, your right to privacy in deciding whether to register or in applying to register to vote, or your right to choose your own political party or other political preference, you may file a complaint with:

Secretary of State

PO Box 20126

Lansing, MI 48901-0726

Best Practices:

- Explains that voter registration form will be sent through the mail and gives option of downloading immediately.
- Provides telephone number for assistance.
- Explains where to mail completed voter registration forms and that completed forms can be returned to local county office.
- All the required NVRA language is correct.