



March 24, 2026

Hon. Beau Beaulieu, Chair
House and Governmental Affairs Committee
900 North 3rd St.,
Baton Rouge, LA 70804

Submitted via Email

Dear Chair Beaulieu, Vice Chair Lyons, and Members of the Committee:

On behalf of the Fair Elections Center and League of Women Voters of Louisiana, we are writing to express our strong opposition to HB 691, a bill to require the Secretary of State's office to use the Department of Homeland Security's (DHS) Systematic Alien Verification for Entitlements (SAVE) system on an annual basis for voter list maintenance. Importantly, recent changes to SAVE have introduced highly unreliable citizenship information into the system, and evidence from other states that have used the overhauled SAVE system has shown that eligible voters are having their citizenship wrongly questioned because of these changes, threatening their voting rights.

I. 2025 SAVE System Overhaul Created New Unreliability in the System, Making it Inaccurate for List Maintenance

In May of 2025, the SAVE system underwent a massive overhaul by DHS in cooperation with the Social Security Administration (SSA) that introduced significant unreliability issues into the query results returned by the SAVE system.¹ Specifically, the changes made to SAVE include:

¹ Fair Elections Ctr., Eligible Voters at Risk: Examining Changes to USCIS's Save System, Issue Brief (July 2025), <https://fairelectionscenter.org/wp-content/uploads/2025/07/Examining-Changes-to-USCISs-SAVE-System.pdf>; See also *Eligible Voters at Risk: Examining Changes to USCIS's SAVE System*, Fair Elec. Ctr., <https://fairelectionscenter.org/uscis-save-system-report/> (last visited Mar. 23, 2026).

- SAVE now integrates SSA data (not just DHS data). This means SAVE now accesses citizenship information housed in the SSA, including records for U.S.-born U.S. citizens as well as derived citizens who have not applied for a certificate of citizenship.
- SAVE now allows users to query the system using Social Security Numbers (not just DHS-issued immigration identifiers). This includes queries using either full or partial (last four digits) SSNs.
- SAVE now allows bulk uploads of voter data for SAVE queries (not just individual searches). SAVE users can now upload voter data—names, birthdates, Social Security numbers, and other numeric identifiers—in massive spreadsheets for tens of thousands of individuals at a time.

This overhaul means that SAVE has gone from a tool used to investigate the citizenship status of people who had interacted with the immigration system at some point to now being purportedly used for the large-scale investigation of the citizenship status of all voters, including *U.S.-born citizens*, using SSA Social Security data.

By the SSA’s own admission, however, this SSA data is an incomplete representation of a person’s citizenship status—according to SSA, their data “merely represents a snapshot of the individual’s citizenship status at the time of their interaction with SSA. SSA’s records *do not* provide definitive information about an individual’s citizenship status.”² For example, SSA policy requires *every* Legal Permanent Resident (LPR) to have a Social Security Number, but SSA has no current process for automatically updating the citizenship data it maintains when an LPR naturalizes. The only way for a person to correct citizenship status information with SSA is by in-person appointment at an SSA office, a burdensome, time-consuming process—SSA policy states that a person has “no obligation...to report to SSA a change in their immigration status *unless the individual is receiving Social Security payments.*”³

The result of reliance on SSA data for list maintenance is that it will disproportionately and adversely flag naturalized citizens and others for whom SSA has inaccurate and outdated data. Naturalized citizens are most at risk because, unlike U.S.-born citizens, their status is not static; if they interacted with SSA before their naturalization, SSA records likely reflect their former—and currently inaccurate—noncitizen status. Importantly, this problem is one that DHS cannot mitigate in SAVE. As a 2012 report to USCIS explained, “[t]he lack of a common identifier, such

² Letter from Nancy Morales Gonzalez, Assoc. Gen. Couns. for Gen. L., Div. 1, U.S. Soc. Sec. Admin., to Jon Sherman, Litig. Dir. & Senior Counsel, Fair Elections Ctr. 2 (July 13, 2023), <https://fairelectionscenter.org/wp-content/uploads/2025/07/SSA-Touhy-Decision-letter.July-13-2023-signed.pdf> [hereinafter “July 2023 SSA Letter”].

³ July 2023 SSA Letter.

as the SSN, between SSA and DHS records means that information about foreign-born citizens contained in USCIS naturalization databases may not be locatable when SSA information is inadequate to confirm citizenship status.”⁴ Thus, cross-checking SSA search results against DHS databases will do little to mitigate risks since the databases lack a common identifier and were never intended to be linked in this way.

II. Real World use of Overhauled SAVE has Resulted in Eligible Voters Having their Citizenship Status—and Voter Registration—Improperly Questioned

Since SAVE’s overhaul, there have been many documented incidences of eligible voters being erroneously flagged as non-citizens—for example, of voters flagged by SAVE as potential non-citizens in seven Texas counties, 193 of 565 voters had submitted their registration application through the Texas Department of Safety, an agency that requires proof of citizenship from anyone who wants to register to vote there; in other words, the state identified them as alleged noncitizens based on SAVE despite having proof on hand that this status was inaccurate.⁵ In Denton county, Texas, approximately 14% of voters who were identified as noncitizens by SAVE provided proof of their citizenship to remain on the rolls—though county officials acknowledged the real error rate is likely higher since many voters likely did not respond in time to meet Texas’s 30-day deadline.⁶

Louisiana election officials themselves have conceded the potential for inaccuracies when using SAVE. Secretary of State Nancy Landry told the Louisiana Illuminator that the results of her 2025 comparison of state voter registration data to SAVE could be in error or attributed to outdated information.⁷ Even knowing the potential for error and inaccuracy, the Secretary of State’s office moved forward with a purge process for these voters, stating that “[a]nyone who does not respond or provide proof within 21 days are moved from the rolls,” and “will be referred for criminal prosecution.”⁸ No eligible voter should have their voter registration status challenged based on such inaccurate information about their citizenship.

⁴ Westat Report to Dep’t of Homeland Sec., Evaluation of the Accuracy of E-Verify Findings xii (July 2012), <https://www.everify.gov/sites/default/files/everify/data/FindingsEVerifyAccuracyEval2012.pdf>.

⁵ Natalia Contreras, *Texas counties look into ‘potential noncitizens’ on voter rolls. Here’s what they’re finding*, VOTE BEAT TEX. (October 31, 2025), <https://www.votebeat.org/texas/2025/10/31/county-election-officials-investigate-potential-noncitizens-flagged-save-database/>.

⁶ Jen Fifield & Zach Despart, “*Not Ready for Prime Time.*” *A Federal Tool to Check Voter Citizenship Keeps Making Mistakes*, ProPublica & Texas Tribune (Feb. 13, 2026), <https://www.propublica.org/article/save-voter-citizenship-tool-mistakes-confusion>.

⁷ Greg Larose, *Voting rights, privacy advocates sue to stop Trump administration’s ‘national data banks’*, LA. ILLUMINATOR (Oct. 1, 2025), <https://lailluminator.com/2025/10/01/trump-voting-data/>.

⁸ Jude Joffe-Block & Miles Parks, *33 million voters have been run through a Trump administration citizenship check*, NPR (Sept. 11, 2025), <https://www.cfpb.org/2025-09-10/33-million-voters-have-been-run-through-a-trump-administration-citizenship-check>.

III. HB 691 Will Subject Many Eligible Voters to Criminal Investigation

Like the Secretary of State's prior approach to individuals identified—rightly or wrongly—by SAVE as potential non-citizens, HB 691 requires the Secretary of State to submit the name of “every *potential* noncitizen registrant to the division of election integrity for investigation.” The Division of Election Integrity is then required to submit anyone for potential criminal prosecution if they find that there “*may* be a noncitizen registrant in the state voter registration computer system...” Notably, the proposed statutory language fails to name what investigatory steps or evidentiary standards the Secretary of State or Division of Election Integrity should take when referring a person for criminal prosecution. If these officials rely only on an initial response from SAVE about a person's citizenship status, there is a high likelihood that they will refer many eligible, law-abiding, citizen voters for criminal prosecution. Such referrals will not only endanger eligible voters' voting rights but will also intimidate eligible citizens from voting.

For the above stated reasons, we strongly urge you to oppose HB 691. The overhauled SAVE system is an inaccurate and unreliable tool for list maintenance that will result in many law-abiding Louisiana voters having their voter registration questioned and potentially being referred for criminal prosecution. If you have any question or need additional information on this matter, please contact Patrick Williamson, Counsel at the Fair Elections Center, at pwilliamson@fairelectionscenter.org.

Sincerely,

Patrick Williamson
Counsel, Voting Rights Project
Fair Elections Center
1825 K St. NW, Ste. 701
Washington, DC 20006

M. Christian Green, President
League of Women Voters of Louisiana