



U.S. Election Assistance Commission

Voter List Maintenance Study

**The Use of Third-Party
Commercial Data for Accurate
Voter Lists**

August 2025



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Executive Summary

The U.S. Election Assistance Commission (EAC) seeks to provide research and resources related to a variety of election administration tasks, including voter list accuracy and maintenance, as directed in the Help America Vote Act of 2002.

Voter list maintenance is the process state and local election officials use to ensure that voter registration databases are accurate and up-to-date. Maintaining accurate voter registration lists is essential to administering secure and efficient elections. Federal law establishes a baseline of requirements and ground rules, but the frequency, scope, and specific list maintenance activities vary by state.

Voter registration lists are constantly evolving. Every day, Americans move, die, turn 18, or otherwise have residency or other changes in all jurisdictions. Election administrators must ensure this continually evolving data set is as accurate and up-to-date as possible. The benefits of having accurate registration lists include:

- Ensuring eligible voters are accurately assigned to the correct voting districts and receive the proper ballot.
- Ensuring only eligible voters can cast a ballot in the jurisdiction.
- Reducing costs by helping to accurately budget the number of ballots, voting machines, poll books, polling places, and poll workers.
- Minimizing congestion or wait times at the polls.
- Reducing demands on poll workers to complete unnecessary additional forms at the polls.
- Simplifying post-election procedures by reducing the need for provisional ballots.
- Instilling confidence in voters about the integrity of elections.

In 2012, Orange County, California, entered into a contract with a credit bureau, using the credit bureau's address database as an additional resource for voter list maintenance. Since then, the Orange County Elections Office has utilized the best address information over several general election cycles and voter list update periods. Subsequently, several other states and election jurisdictions implemented similar list maintenance and address update programs using the best address information. The EAC was interested in researching whether credit bureau address data could be an additional helpful resource for other election jurisdictions nationwide. The EAC's pilot study on the use of third-party credit bureau data as a potential source of addresses for voter list maintenance included 11 jurisdictions (six states, five counties, and one city) from across the country, with various election laws and regulations. Participants in the pilot study submitted all or part of their voter lists to a credit bureau, Experian, and received reports of potential new addresses for voter records submitted. Over 11 million addresses were run as part of the pilot study. The percentage of potential new addresses returned by Experian ranged from 7% to 22%, meaning that most voter registration system addresses





were the most current. However, the pilot study revealed that in all participating jurisdictions, the third-party credit bureau database likely had more current address information for some voters in all participating jurisdictions' registration systems. This suggests that using credit bureau data to determine new or best voter addresses may be a useful additional tool for election officials for notification of new best addresses and list maintenance processes, including using the data source to help track down harder-to-locate voters and update their registration records. Further research questions should be answered related to the accuracy of the data and its utility for voter list maintenance purposes, as well as policy and practical administration considerations, including potential legal changes in state law, which are described in more detail in the report.





Introduction

The EAC is the only federal agency solely dedicated to assisting state and local election officials with the administration of elections — providing resources to support officials in all stages of elections, including voter list accuracy and list maintenance tools. In 2005, the EAC provided voluntary guidance on implementing statewide voter registration lists, including list maintenance.¹ The EAC's mandate includes conducting research, developing guidance, and serving as a clearinghouse of information about election administration. In that role, the EAC looks for innovative practices by local and state jurisdictions throughout the country that other jurisdictions can learn from and use to improve election administration.

In researching new ways that state and local election offices are conducting voter list maintenance, the EAC contacted the credit bureau Experian in November 2022 regarding jurisdictions' use of Experian's TrueTrace product for voter list maintenance. This Report outlines the purpose of, and common data sources used in, voter list maintenance, and the pilot study's findings.

HAVA authorizes the structure of the pilot study, specifically Sections 214-247, which permits studies and other activities to promote the effective administration of elections, including specifically Section 241(b)(3), "Methods of voter registration, maintaining secure and accurate lists of registered voters..."

Voter Registration and Voter List Maintenance

All states, except North Dakota, require citizens to register with a state or local elections office prior to participating in certain election-related activities, such as signing candidate petitions or voting. Election officials must accomplish two primary activities related to voter registration: adding only individuals to the voter registration list who are eligible to vote and maintaining the list's accuracy. The process of updating voter registration databases and removing ineligible voters is referred to as list maintenance.

States offer several registration methods, including online voter registration, automatic voter registration, registration at departments of motor vehicles, paper

¹ U.S. Election Assistance Commissioner, "Voluntary Guidance on Implementation of Statewide Voter Registration Lists," available at https://www.eac.gov/sites/default/files/eac_assets/1/1/Implementing%20Statewide%20Voter%20Registration%20Lists.pdf (last accessed August 18, 2025)



registration, and Election Day registration. States and localities need timely sources of information to maintain accurate addresses.

Federal and State Roles in Voter List Maintenance

Voter list maintenance is critical to ensuring the accuracy and integrity of the voter registration database. Both federal and state governments play significant roles in this process, each with distinct responsibilities and regulations.

Federal Role

The federal government establishes a baseline of requirements for voter list maintenance through two key pieces of legislation: the National Voter Registration Act of 1993 (NVRA) and the Help America Vote Act of 2002 (HAVA).

The National Voter Registration Act (NVRA) became effective after the 1994 general election.² The law requires states to conduct general list maintenance and establishes a process for states to keep voter registration lists accurate. List maintenance programs must be uniform, nondiscriminatory, and compliant with the Voting Rights Act. States have discretion in managing their ongoing, reasonable list maintenance programs, but some procedures, such as removal from the voter list, are outlined in the NVRA. Under this law, a voter can be removed from a state's list for the following reasons:

- The voter requests to be removed.
- The voter dies.
- The voter is declared mentally incapacitated if state law requires removal on this basis.³
- The voter is convicted of a specified crime if state law requires removal on this basis.

² Several states are not covered by the NVRA. North Dakota is exempt because it does not have voter registration. U.S. territories are also not subject to the NVRA, and the states of Idaho, Minnesota, New Hampshire, Wisconsin, and Wyoming are exempt because they had same-day registration (SDR) at polling places in 1994 and have continued to make this option available uninterrupted since that time.

³ The NVRA permits states to remove registrants because of mental incapacity. According to the Bazelon Center for Mental Health Law, 13 states have laws that bar voting by individuals under guardianship, 22 states require courts to determine capacity, four states bar those who are non-compos mentis, five states use outmoded terms to describe people who can be barred from voting based on competence, and 10 states do not have disability-related restrictions.



- The voter changes residences outside of the jurisdiction, in which case the removal process must be conducted under procedures outlined in the NVRA.

Under the process established by the NVRA for address list maintenance, when returned or undeliverable mail indicates a voter has moved outside of the jurisdiction, the state must follow a process to verify that the individual is no longer eligible to vote. Unless an individual updates their information (directly with an election office or through another agency like the Department of Motor Vehicles), election officials must follow an address confirmation procedure before removing the voter from the registration list.⁴

The Help America Vote Act of 2002 (HAVA) also required states to develop statewide voter registration databases.⁵ Previously, jurisdictions in many states maintained their own local databases. Centralized databases facilitate coordination across local jurisdictions within a state, or between states, leading to more accurate voter registration lists. Additionally, HAVA requires first-time voters to provide their driver's license number or the last four digits of their social security number when registering or provide identification the first time the voter casts a ballot.

HAVA also clarified Congress's intent in the NVRA that a voter cannot be removed from a voter registration list for the sole reason that they did not vote. HAVA does allow for the removal of voters who 1) do not respond to a single voter address confirmation notice and 2) subsequently do not vote in the next two federal general elections. However, the Supreme Court noted that the confirmation mailing process outlined in the NVRA may be instituted based on failure to vote in an election or series of elections.⁶

Other federal laws that provide additional details and protections related to list maintenance include the Voting Accessibility for the Elderly and Handicapped Act, the Uniformed and Overseas Citizens Absentee Voting Act, and the Military and Overseas Voter Empowerment Act.

These laws, as well as state-level additions, seek to balance ensuring that lists are accurate while protecting voters from removal when inappropriate. The balance is struck mainly through procedural mechanisms—ensuring that voters are contacted multiple times, provided multiple chances to correct information, or provided opportunities to validate their information at a voting location or election office before removal.

⁴ Non-citizens, including permanent legal residents, cannot vote in federal, state, and most local elections. In some states, identified ineligible voters may be removed immediately, while others require a mailing to the voter to confirm the status before removal.

⁵ The Help America Vote Act, P.L. 107-252, Sec. 303.

⁶ *Husted v. Randolph Inst.*, 584 U.S. ___, 138 S. Ct. 1833 (2018).



State Role

While federal laws provide a regulatory floor, states have the authority to go beyond these requirements and implement additional measures to maintain accurate voter lists. The specific activities and frequency of list maintenance vary by state, and the mix of work done at the state and local levels also differs across the country. That is, the exact practice of voter list maintenance in each state is a product of state law and state policy, as well as local implementation and resources.

In the United States, 49 of the 50 states, the District of Columbia, and the five territories require voters to register before casting a ballot. Voters must provide basic information about themselves (name, date of birth, physical address), all of which is entered into voter registration databases. This information may be input by local jurisdictions and then transmitted to the state, entered by the state and transmitted to local election jurisdictions, or gathered from other sources, such as the state motor vehicle agency, and then processed through appropriate channels. In some states, voters must register days or weeks before an election to be eligible to cast a ballot. In contrast, other states authorize same-day registration, permitting a voter to provide the necessary information and then, once verified, cast a ballot immediately.

However, capturing a voter's information at the time of their registration cannot reflect all the changes that might occur to that voter before the next election. Voters move, either within a jurisdiction or across jurisdictional lines, die, become ineligible, or make other changes that may impact voter registration records.

Typical voter list maintenance practices at the state and local level include:

- **Deceased Voters:** Federal law requires states to cross-reference their voter list with data from state death records and cancel the records of deceased voters. Some states use additional data sources to verify deaths, such as obituaries, data from other states' vital records bureaus, Social Security Administration records, probate court notices, and other sources.
- **Voters Who Have Moved:** States must also update voter registration information when a voter moves. This may involve coordinating with other states to track voters who move across state lines and using data from the U.S. Postal Service's National Change of Address (NCOA) program.
- **Ineligible Voters:** States are responsible for removing ineligible voters from the voter list, such as those who are convicted of a felony or declared mentally incapacitated. States also are responsible for ensuring that ineligible voters, such as those who are not citizens, are not registered in the first place. The criteria for ineligibility and the processes for removal vary by state.



Between the close of registration for the 2022 general election and the close of registration for the 2024 general election, states reported removing 21,298.175 records from their voter registration list. This was equal to 9.1% of the total number of voters registered in the United States as of the close of registration for the 2024 general election. The most common reason for removal was the failure to both respond to a confirmation notice and to voter in two consecutive federal general elections, which accounted for 33.5% of all removals, followed by a cross-jurisdiction change of address (30.8). The death of a registrant accounted for 21.2% of removals.⁷

Voters Removed		Reasons for Removal					
Total	Registered Voters	Moved Out of Jurisdiction		Voters Deceased		Failure to Return Confirmation Notice	
		Total	Percent	Total	Percent	Total	Percent
21,298,175	9.10%	6,504,112	30.80%	4,482,207	21.20%	6,693,317	33.50%

Data for U.S. Population, Derived from 2024 EAVS

Third-party Notifications and Data Sharing

Election officials receive first- and third-party notifications of voter registration changes. First-party notifications are generated by the actions of voters themselves, such as the completion of a new voter registration application by paper or online, a change to their voter registration during a state motor vehicle transaction, or a voter's request to cancel their registration. Third-party notification refers to information from trusted sources indicating an update to a voter registration record is warranted.

Several states have implemented their own initiatives to integrate third-party data for voter list maintenance. Laws and regulations vary by state, but common trusted third-party sources of information include:

- Social Security Administration
- Health departments
- Courts
- State motor vehicle offices
- Other state-level governmental entities
- Other election offices

These examples demonstrate that states have already successfully adopted policies that allow using third-party data to maintain accurate voter registration lists. By leveraging data from various sources, election officials can improve the accuracy

⁷ Election Administration and Voting Survey 2024 Comprehensive Report. U.S. Election Assistance Commission, available at https://www.eac.gov/sites/default/files/2025-07/2024_EAVS_Report_508.pdf, p. 186. (last accessed August 18, 2025).



and reliability of voter lists, ensuring that only eligible voters are registered and that voter information is current. In some states, this process is also aided through voter registration policy choices such as same-day registration (where voters can update their information at the polling place) or by adopting laws allowing for automatic voter registration (where a voter's interaction with a government agency, such as a state motor vehicles agency, can result in updates to their voter record as well, unless a voter opts out).

Some states have also adopted policies that allow data sharing with other states as part of their voter list maintenance activities. Such data sharing can occur on an individual state-to-state basis or through broader data-sharing programs, such as the Electronic Registration Information Center (ERIC) or a former program, Crosscheck.

Third-Party Credit Bureau Pilot Study

Introduction

The third-party credit bureau pilot study involved Experian Information Services providing election officials access to its address database to compare with all or part of the addresses in their voter registration systems. The EAC paid for the database's use so jurisdictions could test and evaluate the usefulness of credit bureau information for list maintenance without incurring additional expenses.

Background

Election officials continue to research and innovate in voter list maintenance. In 2012, Orange County, California, entered a pilot with the credit bureau Experian to use Experian's address database for voter list maintenance purposes. Orange County's Registrar provided Experian with a list of voter records per state law. Experian compared those records with its list of address records derived from numerous other commercial and public sources. When an address matched a voter's name and address history, Experian "flagged" the voter with the new address. At this comparison's end, Experian gave Orange County a list of the addresses of its voters, for whom Experian believed they had a more up-to-date address. Orange County then sent postcards to voters whom Experian's data had flagged, asking voters to update their voter registration records. Over four data runs with Experian, and over four federal election cycles, Orange County sent



CASE STUDY: Orange County, CA

Orange County, California has partnered with Experian since 2010, initially running a pilot study, and then expanding into a longer term contract where in the County runs part or all of its voter lists every two years.

In a 2019 report, the County summarized its returns, noting that it had received over 400,000 updated voter records in the first four uses of the Experian product, and confirmed updates for over 74,000 voters. The County added, “It is clear that using address data provided by a credible third-party data provider is more effective when trying to contact voters who have possibly moved. Although our office can simply attempt to contact these voters using their addresses on file, we will have better success of actually reaching the voters if we use the additional data provided by the credible third-party data provider... It has not only resulted in hundreds of thousands of dollars of savings in printing and mailing costs, but it has also improved the accuracy of the voter list.”

401,000 voter records and generated 74,100 voter-confirmed information updates.⁸ It is important to note that Orange County (and all jurisdictions that use this data) fully comply with the National Voter Registration Act’s notification process before placing registrants on the inactive list or removing voters from their rolls.

To determine whether the success of the Orange County pilot could be replicated nationwide, the EAC contracted with the credit bureau Experian to conduct an EAC-sponsored pilot study allowing jurisdictions to use Experian’s TrueTrace product for voter list maintenance. Since 2012, some election offices, in addition to Orange County, have also used Experian’s data to inform their list maintenance processes, including the State of West Virginia, El Paso County, Colorado, and Washington D.C.⁹ Other government agencies have also used Experian data, including county tax collectors, the IRS, Veteran Affairs, the USDA, and the Centers for Medicare and Medicaid.

The EAC pilot study aimed to develop a robust data set of records for analyzing when, if ever, Experian data is more advantageous for voter list maintenance.

EAC personnel began developing criteria for selecting jurisdictions in the pilot study in February 2023. The list of criteria included:

- Variety of jurisdiction levels (state, county, city/township)

⁸ Orange County, California Registrar of Voters, “2020 Voter List Maintenance Report,” available at <https://ocvote.gov/election-library/read/2020%20Voter%20List%20Maintenance%20Report/index.html#p=32> (last accessed August 18, 2025)

⁹ Experian, “Case Studies: Enhancing Voter List Maintenance with Advanced Data Solutions,” available at <https://www.experian.com/blogs/insights/case-studies-enhancing-voter-list-accuracy/> (last accessed August 18, 2025)





- Variety of jurisdiction sizes (measured through the number of active voters and percent of active voters compared to total voters)
- Voter registration system type (top down, bottom up, hybrid)
- Mail-in balloting variations
- Jurisdictions that were and were not members of ERIC
- Whether the state utilizes Automatic Voter Registration
- Whether the state is subject to the NVRA
- Whether the jurisdiction uses NCOA
- Whether there is a significant military presence or UOCAVA voters
- Language access needs
- Geographic diversity (Local Leadership Council region, Census Region)
- Additional features (college community, Native American reservation, etc.)

Invitations were extended mainly to the EAC's Federal Advisory Committee Act board members throughout 2023 and early 2024 to recruit participating jurisdictions. EAC staff spoke with over 50 jurisdictions about potential participation in the Pilot Study. Many of these jurisdictions expressed interest in participating but could not join due to timeline or legal restrictions based on state law.

Data Submission and Onboarding

Submission Process

Each jurisdiction was provided with the opportunity to run its whole voter list or a subset of the list (for example, only inactive voters). Jurisdictions selected which lists to submit based on ease of preparation, desired data for analysis, and other internal factors. They submitted the data to Experian via:

- Batch searches (Users can perform batch searches using a comma-separated values file to process a large number of address lookups via the True Trace system at once)
- Real-time web portal (Users can access search to run addresses one by one.)

CASE STUDY: West Virginia

West Virginia worked with Experian in 2023 to send reminder mailings, a part of their routine voter list maintenance process. The True Trace product returned approximately 16,000 voters with potentially new addresses. Of those 16,000, subsequent mailings confirmed that 25% had indeed moved and could be entered into the normal NVRA process.

No jurisdiction chose to use the individual lookup tool during the pilot study. Jurisdictions in the pilot study provided anonymized data for analysis to the EAC.





Experian supported submitting voter data, requiring first and last name as well as full address, and supporting date of birth when it was permitted and available per respective state laws through their system to identify potential matches for a new “best address.” For those jurisdictions that opted in and provided enough addresses, Experian also provided information about whether the new address found for a voter derived from the USPS’ NCOA data. Any data run through Experian’s TrueTrace system has no impact on an individual’s credit, nor does any data returned by Experian include any credit information.

Data was submitted via a Secure File Transfer Protocol and all accounts with Experian included external validation of the existence of the account, as well as two-factor authentication.

Onboarding

Participating jurisdictions submitted their data directly to Experian and were onboarded to the technology by Experian staff. The data submitted to Experian included:

- Voter’s name
- Address (street, apartment/unit number, if applicable, city, state, and zip code)
- Where permissible, the voter’s birthdate

The onboarding process included the submission of extensive paperwork (applications, agreements, and data sufficient for Experian to validate the existence and proper identity of the jurisdictions participating in the pilot study, as well as agreements related to the confidentiality of the information shared with Experian), and video training on how to register for and use the TrueTrace system. Additionally, Experian staff provided technical support to participants throughout the pilot study. At no point did Experian retain any of the data received as part of the Pilot Study, nor did they use the data in any other way.¹⁰

Findings

After receiving data from Experian, EAC staff met with pilot study participants several times to discuss their experiences and lessons learned. Participants emphasized their appreciation for the pilot study, noting that they found both the

¹⁰ See Section 3(B) of Agreement with Experian, stating “Any non-public data or information provided by or on behalf of Agency to Experian in connection with Agency’s request for the Services and which does not constitute Experian Data (“Agency Data”) is and shall continue to be the exclusive property of Agency. Except as otherwise permitted in a Schedule, Experian agrees to (i) use Agency Data only for purposes of providing the Services to Agency, and (ii) take reasonable steps to maintain the confidentiality of Agency Data and prevent unauthorized access, use or disclosure of Agency Data.”



premise and the data interesting. However, numerous participants highlighted that they were still analyzing the address files to determine their use in their jurisdictions.

Key Points from Feedback Sessions

- Comprehensive Data:
 - Participants noted that the credit bureau data on address changes was more comprehensive than other address databases, such as NCOA.
- Effective Tool:
 - Many participants viewed the data as a useful addition to their existing resources for voter list maintenance. The data was particularly helpful in locating current addresses for university students who frequently change residences.
- Cost Savings:
 - Participants noted that new addresses derived from the data would help reduce the number of non-deliverable ballots, leading to cost savings.
- Implementation Considerations:
 - Participants emphasized the need to make policy decisions before using the data, especially for voters with multiple or seasonal addresses.

"[Our] participation in the initial pilot was successful, resulting in over 2.6 million voter records returned with either a confirmed or a new address."

-- Participating Jurisdiction

"These were voters that were on our inactive voters list due to returned mail. I was very impressed with the ... return I received back from Experian. This helped us locate and send letters to the voter, that then in-turn responded and we were able to remove from our voters list."

-- Participating Jurisdiction

- There was interest in increased transparency regarding record matching methods and confidence scores provided by Experian.

- Participants requested more information in future data sets, including residential vs. commercial address demarcation, vacancy information, Social Security Administration death database information, and additional

contact information for voters.

- Concerns were raised about minor address changes, such as spelling variations in names and street addresses, as well as different apartment numbers within the same building.



- Concerns about ensuring proper matching of addresses for military voters registered under UOCAVA but stationed elsewhere were discussed.
- Participants reported difficulties integrating updated records into their existing voter registration databases.
- Smaller jurisdictions faced challenges in utilizing the data due to staffing and budget constraints compared to state-level jurisdictions.
- Participants recommended batching data by voter record type, separating active, inactive, and potentially active voters with suspected incorrect addresses.

Analysis

Overall, an analysis of the data shows:

- Most of the submitted addresses were already up-to-date in the voter registration systems, but in every jurisdiction, the third-party credit database had addresses that were likely newer for some voters. For jurisdictions that submitted more than 10% of their voter lists, potential new addresses returned ranged from 7% to 22% of the voter records the jurisdiction submitted to the credit bureau.
- This tool may be particularly useful for identifying new addresses for inactive voters. One jurisdiction submitted a small number of addresses that the jurisdiction suspected to be incorrect, and Experian returned a different address for 98% of the records. Another jurisdiction submitted its active and inactive voter lists separately, with the active voter list resulting in 12% new addresses and the inactive voter list resulting in 39% new addresses.
- Some people did not have information in the third-party credit bureau's records. The percentage of voter records where an individual was not identified in the third-party credit bureau database (no match for the address in the voter list nor a potential new address) ranged between 6% and 22% of voter records submitted by jurisdictions.¹¹

New address returns ranged from 7 to 22%. One jurisdiction that ran its inactive voter list separately received 39% new addresses.

¹¹ There are many reasons why a “new address” or no address might not be returned by TrueTrace. These include details related to exact address matching (for example, apartment number missing in Experian’s data), exact name matching (inclusion or exclusion of a middle initial or suffixes), or failure to engage with the data sources used by Experian, among other reasons. No match in this context means that Experian’s address match was not at a sufficient confidence interval to be considered a match - it is not necessarily the



According to recent research, about one in 10 Americans has no credit history with any of the three major credit bureaus.¹²

- The credit bureau's records included new addresses that the NCOA data did not. As part of the data runs, participating jurisdictions could elect to include NCOA as a data source provided by Experian. An exact percentage comparison between the credit bureau data and the NCOA data is difficult, as there was no automated way to identify in aggregate if the NCOA result was the same as the new address returned by Experian. Pointing to absolute numbers of NCOA hits is inexact. Still, potential new address NCOA returns provided by Experian (for participating jurisdictions that submitted more than 10% of their voter lists) ranged from 2-7%, lower percentages than the overall potential new addresses identified by the credit bureau.

Third-party credit bureau data appeared to outperform NCOA, with NCOA returns of new addresses for participating jurisdictions ranging from 2 to 7% and credit-bureau data resulting in new addresses for 12 to 21%.

State-Level Case Study

One of the state-level jurisdictions provided the EAC with additional anonymized data for every voter in the state it submitted to Experian. The data shared with the EAC did not include a voter's name, street address, or other identifying information. In this jurisdiction:

- The majority of voters had at least one transaction in the third-party credit bureau database in the last six months. Experian's data showed that 67% of the voters had a "touchpoint" (some interaction with the data that Experian uses for credit reporting purposes) within the past month, and 82% had a touchpoint within the past six months.
- Recent third-party credit bureau data is likely more useful than data older than six months. For the voters with a recent touchpoint, Experian's data found that 12% of the voters had "new addresses" in

67% of voters in one state pilot jurisdiction had a touchpoint with credit bureau data within the past month and 82% had one within the past six months.

case that an individual was not found in the data, but rather that this threshold was not met.

¹² United States Government Accountability Office, "Mortgage Lending: Use of Alternative Data is Limited but Has Potential Benefits" <https://www.gao.gov/assets/gao-22-104380.pdf> (last accessed August 18, 2025)





that past month, whereas those that had touchpoints older than six months had a “new address” of 29%. We cannot be sure which set of data is the most accurate (the Experian data or the voter registration data) because voter list maintenance was not done with this data, but jurisdictions that wish to use a product such as Experian’s may consider whether to screen out older touchpoints to ensure that data is more recent and thus more likely reflecting an actual address change.

- New address match rate in third-party credit bureau data correlates with the mobility rate of voters each year. The Census Bureau reported the percentage of movers to a different residence in 2023 was 12%¹³ Experian data in this state-level case study also found that 12% of the voters had new addresses within the past month.

Demographic Correlations

Using data from the Census Bureau, the data in this same jurisdiction suggests:

- Certain populations of voters had a higher number of new addresses in the credit bureau database than others. High percentages of specific racial categories (Black or African American, American Indian, Alaska Native, and Other) in a zip code correlated with more “new addresses” from Experian. Similarly, a high percentage of renter-occupied housing in a zip code also correlated with higher “new addresses” from Experian.
- Younger and older voters had a higher number of new addresses in the credit bureau database. Age demographics showed a bifurcated correlation in this jurisdiction, with zip codes with proportionately high numbers of young individuals and older individuals also correlating to high numbers of new addresses. In contrast, middle-aged voters showed a lower number of new addresses. Similarly, a different local jurisdiction with an average age of 30.9, according to the Census Bureau, (a full 7.8 years younger than the average for the whole U.S.) had amongst the highest new address return rates of 22%.

A jurisdiction with an average age of 30.9, 7.8 years younger than the U.S. average had a new address return rate of 22%.

¹³ Census Bureau, “United States Migration/Geographic Mobility At A Glance: American Community Survey 1-Year Estimates” available at <https://www.census.gov/topics/population/migration/guidance/acs-1yr.html> (last accessed August 18, 2025)



Constraints

During the pilot study, jurisdictions had the option to use these new addresses for voter list maintenance purposes in accordance with their respective state laws, though most did not do so during the pilot study's timeframe. The reasons cited by jurisdictions for not using the information for list maintenance activities included financial, timing, and legal constraints. Some pilot participants carried out limited mailings.

Financial Constraints

- Jurisdictions entering into contracts with Experian can enter a subscription model with a monthly or annual fee or pay on a per-transaction basis. A majority of jurisdictions did not have the budget for additional mailings, staff time for processing, and other activities related to the pilot study. It is important to note that these types of costs are routine aspects of list maintenance processes that all jurisdictions routinely undertake. The concern related to costs from the pilot study was that routine activity costs had already been budgeted for prior to participation in the pilot study. Thus, performing list maintenance based on pilot study addresses would have additional costs and staff time beyond those allocated in jurisdiction budgets and plans.

Timing Constraints

- Many jurisdictions participated in the pilot study in proximity to their presidential primary elections (or its equivalent) and could not perform systematic list maintenance during the 90-day National Voter Registration Act-prescribed quiet period.

Legal Constraints

- Data received from the pilot study were not explicitly permissible for list maintenance activities under many state laws. For example, Orange County, California, whose original pilot is described above, had to seek legislative action to use addresses from a third-party credit bureau for list maintenance activities.
- Many states prescribe which data sources election officials may use for list maintenance. When credit bureau data (or a broad, wide-ranging category) is not included, jurisdictions hesitated to use the addresses for list maintenance purposes. Future use of third-party credit bureau data may require state legislative action to make it permissible for election officials to use such data.



Recommendations

The pilot study on using third-party credit bureau data for voter list accuracy and list maintenance raised several research questions and practical considerations that should be answered to ensure the effectiveness of this practice.

Data Quality

One concern about using third-party credit agency records, as is true with many other data sources, is the timeliness and quality of data provided by credit bureaus. It is crucial to assess whether this data can reliably identify new or updated addresses for voters. Jurisdictions should consider the methods credit bureaus use to collect and update address information, including National Change of Address, and identify any potential sources of errors.

Cost-Benefit Analysis

Participating jurisdictions noted that credit bureau data was comprehensive and useful, describing it “as another tool in the toolbox” for voter list maintenance. They expected its use would result in cost savings.

The effectiveness of using third-party credit data compared to other data sources, such as the Electronic Registration Information Center (ERIC) or National Change of Address (NCOA), should be thoroughly evaluated. A cost-benefit analysis should be conducted to determine the financial implications of

acquiring and managing credit bureau data. This analysis should consider the costs associated with integrating this data into existing voter registration systems and the potential benefits in terms of improved accuracy and efficiency in voter list maintenance. There may be other third-party vendors that provide similar data independently or in conjunction with NCOA, at a lower or similar cost. An additional element of this analysis may also include an examination of whether this data should be consistently used at the state or county/municipal level.

Integration with Existing Systems

Jurisdictions should assess the compatibility of integrating third-party credit bureau data with their existing voter registration databases and list maintenance processes, including the supplementing of NCOA. This includes evaluating the technical requirements for data integration, ensuring data security and privacy, and developing protocols for handling discrepancies between third-party credit bureau data and existing voter records.



Policy and Practical Administration Decisions

The pilot study emphasized that jurisdictions should make informed decisions when using third-party credit bureau data, or any data that impacts a voter registration list. This involves creating clear guidelines for data integration, setting criteria for verifying voter addresses, and complying with state and federal laws. Election officials should also work with stakeholders to address concerns, including the limited nature of the address data shared with and by Experian, and build trust in voter accuracy procedures. Additionally, election officials should consider the legal, legislative, and regulatory implications of using third-party data for accurate voter list maintenance.

Further Research and Analysis

Further research and analysis are necessary to determine the best practices for using third-party credit bureau data in voter list maintenance. This includes conducting additional pilot studies in diverse jurisdictions, including those with different policy landscapes, as well as large populations of certain kinds of voters, including college students and UOCAVA voters; analyzing the long-term impact of using credit bureau data on voter list accuracy; and exploring alternative data sources that may complement or enhance the effectiveness of credit bureau data. Collaboration between election officials, researchers, and data providers will be essential to develop a comprehensive understanding of the benefits and challenges associated with this approach.

Conclusion

Accurate voter list maintenance is an essential part of a well-functioning voter registration system — having accurate lists helps reduce costs, decreases wait times, and, most importantly, ensures that only voters eligible to vote can do so, which helps instill confidence in voters about the integrity of elections. The responsibility for an accurate voter list resides with election officials, but the laws and policies that govern voter registration and list maintenance activities and tools available to officials vary greatly across the country. A strong voter list maintenance program requires funding, new technological tools, and resources to maintain, including, but not limited to, voter database management systems, staffing, and mailings (including printing and postage). The most accurate data is vital to states ensuring that eligible voters are not inadvertently removed from the voter list in error, and are provided opportunities to reregister to vote before an election if an administrative error occurs.

In sum, the pilot study suggests that using third-party credit bureau data to determine new or best addresses for voters may be an additional new tool for



election officials' list accuracy and update processes. Jurisdictions that ran their voter lists through Experian's TrueTrace product had results that ranged from 10% to 22% new addresses, potentially providing a list of voters that election jurisdictions could reach out to update voter addresses.

Additional research and analysis should be done to determine which set of data (the original voter list or the new address provided by a credit bureau) is more correct, to determine what, if any, steps should be taken before jurisdictions use the third-party credit bureau data for voter list maintenance.

Further, as discussed above, states may need to make statutory changes to what data sources are permissible for election officials to use for voter list maintenance. Jurisdictions would also need to make policy and practical administration decisions (including considering costs) related to which voter records to submit to credit bureau data sources, how they wish to batch those records, and how to handle any addresses returned, as well as how to integrate any data into their voter registration databases. As an additional tool, jurisdictions may also want to compare the credit bureau data with data derived from other, more traditional sources (such as NCOA or interstate data matching) from a cost and accuracy standpoint.

Any use of third-party credit bureau data, which may assist election officials in tracking down harder-to-locate voters and updating their records, should supplement and not replace other data sources that election officials currently use in voter list maintenance activities, in accordance with HAVA and NVRA.

Acknowledgments

The list of participating jurisdictions is included below:

- State of Arkansas
- State of Iowa
- State of Louisiana
- State of Maryland
- State of Mississippi
- State of Montana
- City of Waterbury, CT
- Lafayette County, MS
- Nevada County, CA
- Paulding County, GA
- St. Johns County, FL

The EAC would like to thank these jurisdictions for partnering with the agency on the pilot study. Their participation and feedback on the process were integral to informing this report. The EAC would also like to thank Orange County, California,





and the State of West Virginia for speaking with the EAC about their experiences using credit bureau data in voter list maintenance activities and Experian for its cooperation throughout the pilot study.



