

Understanding Voter Registration List Maintenance

Why Voters Are Removed from the Voter Rolls

Every year, thousands of voters are removed from North Carolina's voter rolls. Why does this happen? How can we make sure our voter rolls are up to date but also keep eligible voters from being improperly removed? Southern Coalition for Social Justice has closely watched North Carolina's list maintenance activities since the 2020 election and offers this updated summary of voter list maintenance to ensure that every eligible voter has a fair opportunity to cast their ballot.

What is voter roll list maintenance, and why is it important?

List maintenance is the process states use to maintain accurate and current voter registration lists or "voter rolls." Accurate list maintenance ensures efficient election administration by removing voters who have moved elsewhere, died, are ineligible to vote because of a recent felony conviction, or who are not U.S. citizens. However, list maintenance that is too aggressive or based on faulty information can result in eligible voters being unable to easily cast a ballot. This result threatens the goal of free and fair elections.

In 1993, Congress passed the National Voter Registration Act ("NVRA") to limit when, why, and how election officials may remove ineligible voters from the voter rolls. Under the NVRA, election officials can only remove voters who have (a) requested removal, (b) been convicted of a felony or found mentally incompetent under state law, (c) died, or (d) moved outside the relevant voting jurisdiction.¹ The NVRA also prohibits states from removing voters solely because they have not exercised their right to vote and prevents removals within 90 days of an election.² These protections reflect a careful balance between providing for reasonable voter registration list maintenance while protecting voters from being wrongfully removed, especially on the eve of an election.

Recent attacks on North Carolina's voting infrastructure have included unsupported allegations that North Carolina's voter rolls are overinflated and present a risk to election integrity. In fact, voter fraud is extremely rare and there is no widespread evidence of ineligible persons either registering to vote or casting ballots in North Carolina.

How does North Carolina maintain its voter rolls?

The North Carolina State Board of Elections oversees the list maintenance process for the state's 100 county boards of elections. Under state law, this means removing duplicate entries of voters as well as voters who are rendered ineligible due to death, felony convictions, change of address, or, effective July 1, 2024, lack of United States citizenship.³

Duplicate registrations⁴

There are several automated and manual processes in place to prevent and remove duplicate registrations from North Carolina's voter rolls. To correct and remove duplicate registrations, the State Board sends a weekly data report to all county boards which includes duplicate state-specific voter ID numbers assigned by the State Board (NCID) and driver's license numbers found in the voter rolls. The county boards then review and research the registrations identified in the reports to determine whether corrections are needed. Also, at least once per month, county boards compare county voter registration records with statewide voter registration records to identify potential duplicates. The county boards do so daily during absentee and early voting periods. County boards research any identified potential duplicates and take appropriate action. See below for more information on removing duplicate registrations for voters who have moved to a different county in North Carolina.

Deceased voters⁵

Deceased voters are removed from the voter rolls on a rolling basis. Each week, the North Carolina

1. 52 U.S.C. § 20507(a)(3).

2. 52 U.S.C.A. § 20507(b)(1), (c)(2)(A).

3. N.C. Gen. Stat. § 163-82.14(b)-(d). This section was updated in 2023 by Session Law 2023-140 (Senate Bill 747), with new list maintenance procedures going into effect on July 1, 2024.

4. N.C. State Board of Elections, "North Carolina Voter Registration List Maintenance" at 24-25 (updated Aug. 21, 2024), available at https://s3.amazonaws.com/dl.ncsbe.gov/Voter_Registration/North_Carolina_List_Maintenance_Policy_2024_08_21.pdf.

5. See North Carolina Voter Registration List Maintenance at 17-18, *supra* note 4.

Department of Health and Human Services gives the State Board of Elections a list of deceased North Carolina residents. The State Board then distributes this list to the county boards for removal. County boards can also remove voters from their registration records upon receipt of a signed statement from a near relative or an estate representative of the deceased voter indicating the voter has died. The voter must be removed within one week of receipt of the statement. County boards are not required to send any notice before removing deceased voters from the voting rolls.

Voters with felony convictions⁶

The process of removing voters with felony convictions begins when the State Board compiles and distributes a list of individuals convicted of felonies in North Carolina or federal courts to the county boards each week. The counties must provide written notice to those individuals at their registered address before removing them from the voter rolls. When a voter whose registration was cancelled due to a felony conviction has their citizenship rights restored (i.e., is no longer serving a felony sentence or any post-release probation, supervision, or parole), their voter registration record will be updated to indicate that their felony sentence has been completed. The voter must re-register before voting.

Non-citizen removals⁷

There is no widespread evidence of non-citizens either illegally registering to vote or casting ballots in North Carolina. Yet, the N.C. General Assembly enacted new list maintenance requirements in 2023 targeted at identifying and removing possible non-citizens from voter registration lists. To remove voters who are not United States citizens, the Clerks of Superior Court provide the State Board with a list of individuals who have requested to be excused from jury duty on the basis that they are not United States citizens. Within 30 days, the State Board reviews that list and provides the county boards with a report of voters in their county who self-identified as non-citizens so that they may be removed from the voter rolls. Within 30 days of receiving this information from the State Board, county boards must provide those individuals with written notice and an

opportunity to be heard before removing them from the voter rolls. The challenged residents will have another 30 days from receipt of the county board's letter to object.

Because the law implementing the non-citizen list maintenance procedures went into effect on July 1, 2024 — within 90 days of the November 5, 2024, general election — no voters who requested to be excused from jury duty due to lack of citizenship were removed from the voter rolls prior to that election. Instead, the State Board researched voters identified by the clerks of court and contacted those voters before the election to share its findings. The notice informed the voters that citizenship is a requirement for voting in North Carolina elections, subject to criminal penalty, and asked the voters to voluntarily cancel their registrations if they were not United States citizens.

The non-citizen list maintenance removal process was then implemented in December 2024.

Voters who have moved

Identifying voters who may have moved is a bit more complicated than identifying those disqualified for other reasons. County boards begin this process by monitoring whether voters have made contact with the county board (for example, by voting or updating their voter registration information) for a period spanning two federal elections. Statewide elections take place every two years in even years. If a voter fails to make any contact with their county board of elections for the period spanning two statewide elections, the county board will send a "confirmation mailing" to that voter. For instance, if a voter has made no contact with their county board since October 14, 2022 (when early voting started for the 2022 statewide election), and the voter does not vote in the 2022 or 2024 statewide elections, then that voter will receive a confirmation mailing at their last registered address in early 2025.

These confirmation mailings are "forwardable," meaning if the voter has moved, they can still receive the confirmation mailing if they have left a forwarding address. These mailings ask for a response from the voter to confirm their current address. If a voter fails to respond to the confirmation mailing within 30 days, the voter is labeled

6. See North Carolina Voter Registration List Maintenance at 19, *supra* note 4.

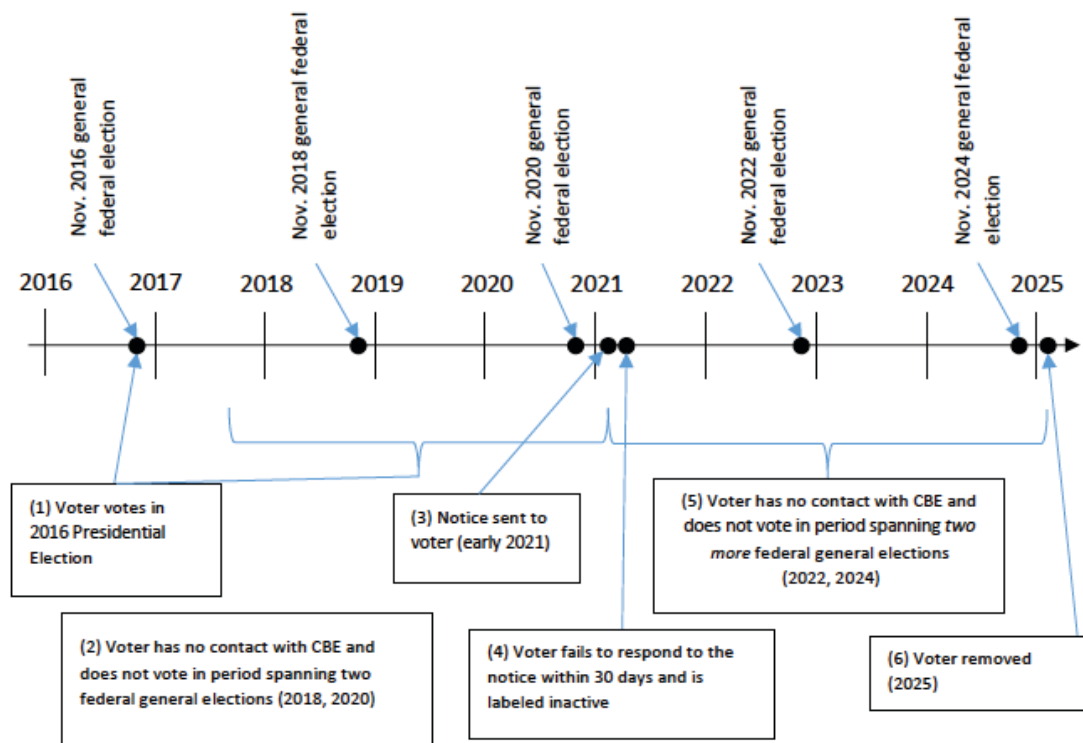
7. Session Law 2023-140, sec. 44; North Carolina Voter Registration List Maintenance at 26, *supra* note 4.

“inactive.”⁸ A voter labeled “inactive” can still vote. But if the inactive voter continues to have no contact with the county board and fails to vote in two more statewide general elections, the voter is removed from the voter rolls. This means that any voter who fails to respond to the confirmation mailings sent in 2021 will be labeled “inactive.” If that voter then fails to vote in either the 2022 or 2024 statewide general election or make other contact with their county board, they will be removed from the voter rolls in 2025.⁹ Any voter who is removed can re-register to get back on the voter roll.

Voters who have moved counties or reported a change of address

Counties also have processes for removing duplicate registrations when a voter moves from one county to another, including an automated check for old registrations for the same individual when a new registration comes in, weekly database checks, and monthly “possible match” reports.¹⁰ The State Board also receives change of address data from the U.S. Postal Service, which the State Board then provides to counties twice a year (January and July).¹¹ County boards use this change of address data to send special confirma-

Timeline of No-Contact Voter Removal Process



Voters can also become “inactive” if other administrative mailings sent from the State Board of Elections, such as the initial verification mailing or a notice of the change in polling location, are undeliverable and the voter fails to respond to a forwardable confirmation mailing within 30 days. However, this has led to inappropriate removals. In some instances, confirmation/verification mailings have been returned due to postal service errors. In other instances, voters have reported never receiving confirmation/verification mailings.

tion mailings to determine whether voters need to change their voter registration address. If a voter fails to respond to the confirmation mailing sent to the new address as identified by the U.S. Postal Service, the county then sends a confirmation notice to the existing registered address. If the voter fails to respond, the voter’s registration status is changed to “inactive” and follows the process described above for inactive voters.

8. The National Voter Registration Act does not permit any voter to be made “inactive” within 90 days of the date of a general election.

9. N.C. Gen. Stat. § 163-82.14(d). See also North Carolina Voter Registration List Maintenance at 27–29, *supra* note 4.

10. See North Carolina Voter Registration List Maintenance at 24–25, *supra* note 4.

11. See North Carolina Voter Registration List Maintenance at 32, *supra* note 4.

Provisional ballots – a “fail safe”

What happens if a voter shows up to their polling place on Election Day and finds they are not on the voter roll or has an address different from the registered address on file? That voter may complete a provisional ballot, which includes an application in which the voter affirms in writing that they are a registered voter in that jurisdiction. County boards must count these provisional ballots if the voter has a history of registration in the county and there is no evidence that the voter resides or has resided somewhere else since they were registered. The voter’s written or verbal affirmation of their continuous residency is sufficient to confirm ongoing eligibility, absent evidence to the contrary.¹²

North Carolina Must Improve its List Maintenance Processes

1. Provisional ballot records indicate that North Carolina’s list maintenance process is overinclusive, meaning that it removes eligible voters in addition to those who may have moved since they registered. North Carolina removes hundreds of thousands of voter registrations under the above-described processes, including 574,396 in January 2019, 391,415 in 2021, and 264,416 in January 2023. There is no evidence that North Carolina’s procedures are underinclusive – that is, that they allow ineligible persons to vote – in a way that threatens election integrity.

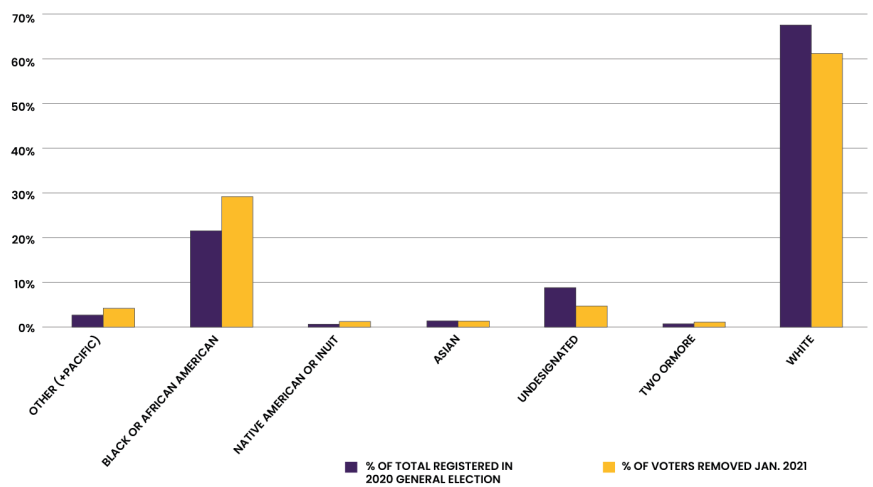
Instead, analysis of removed voters indicates that eligible voters

are being unnecessarily removed. In the 2020 general election, SCSJ analysis found that at least 2,280 of the voters removed from the North Carolina voter roll cast provisional ballots, a process which requires extra steps and can be discouraging to some.¹³ While 1,958 of these ballots were fully or partially counted in the election, 322 were not counted. In 2022, about 1,770 voters who were previously removed cast provisional ballots.

This data suggests that some individuals were removed from North Carolina’s voter rolls when they were, in fact, eligible voters. This may occur for several reasons entirely outside a voter’s control, such as the [unreliability of mailing confirmation cards](#)¹⁴ and the county boards’ inability to conduct more robust voter outreach due to lack of funding.

2021 DEMOGRAPHICS OF VOTERS REMOVED

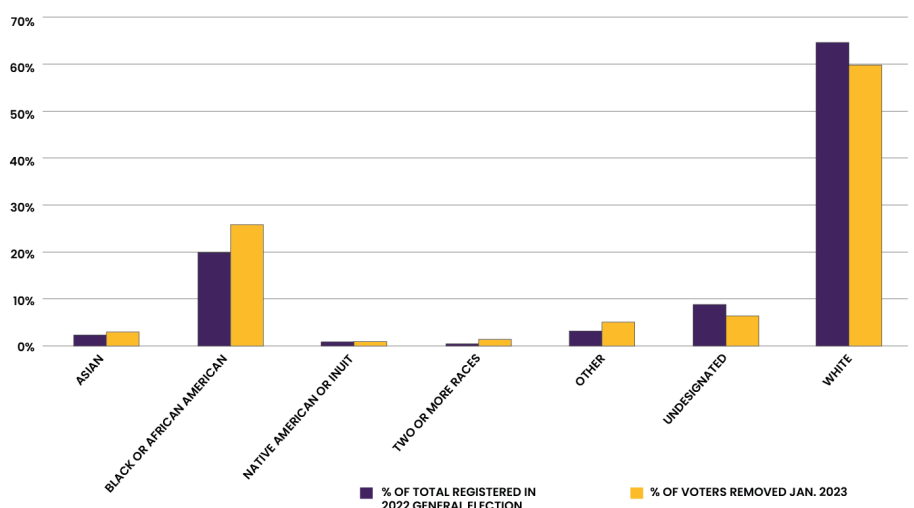
TOTAL: 391,415 VOTERS REMOVED



Source: https://amazonaws.com/dl.ncsbe.gov/data/Snapshots?VR_Snapshot_2021103.zip

2023 DEMOGRAPHICS OF VOTERS REMOVED

TOTAL: 264,416 VOTERS REMOVED



12. N.C.G.S. § 163-82.14(d)(3). See also, N.C. State Board of Elections, Numbered Memo 2023-04 at 7–8, “Provisional Ballots and Canvass Procedures,” (updated February 26, 2024), available at <https://s3.amazonaws.com/dl.ncsbe.gov/sboe/numbered-memo/2023/Numbered%20Memo%202023-04%20Provisional%20Ballots%20and%20Canvass%20Procedures.pdf>

13. This list was created by matching the 2020 provisional ballot file with the State Board’s 2019 list of removed voters using combinations of county name, voter name, and address.

14. <https://southerncoalition.org/mail-returned-as-undeliverable-in-list-maintenance/>

2. There is persistent evidence of racial disparities in how voters are removed under the current list maintenance procedures. SCSJ analysis indicates there was a dramatic increase in the overrepresentation of Black voters in 2021 and 2023 on the removal list compared to their share of registered voters during the prior general election. Black voters went from being +0.75% overrepresented among voters removed in 2019 to being +7.21% overrepresented in 2021 and +5.79% overrepresented in 2023. Meanwhile, during the same period, white voters became increasingly less likely to be removed by the same measure, going from -0.45% underrepresented among voters removed in 2019 to -6.17% underrepresented in 2021 and -5.63% underrepresented in 2023. An analysis of 2025 removals is forthcoming.

The following maps also show that the overrepresentation of Black voters removed from the voter rolls was not uniform and occurred more often in North Carolina's "Black Belt" in the eastern part of the state.

These racial disparities are real, and it is crucial that the State and county boards of elections understand why they exist and take all necessary steps to remediate discriminatory removals that disproportionately prevent eligible Black voters from staying registered.

What can be done to ensure list maintenance is accurate and does not disenfranchise voters?

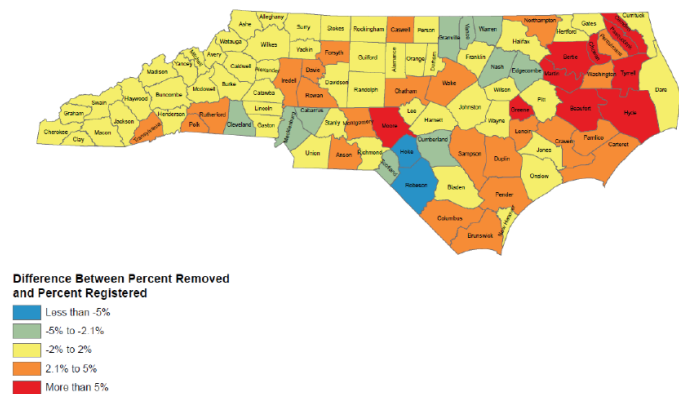
Investigation

Southern Coalition for Social Justice and its partners are continuing to monitor removals and investigate why the list maintenance in 2021 and 2023 disproportionately impacted registered Black voters. It is incumbent upon the State and county election boards, as well as the N.C. General Assembly, to proactively take measures to remediate list maintenance procedures that disproportionately impact Black voters.

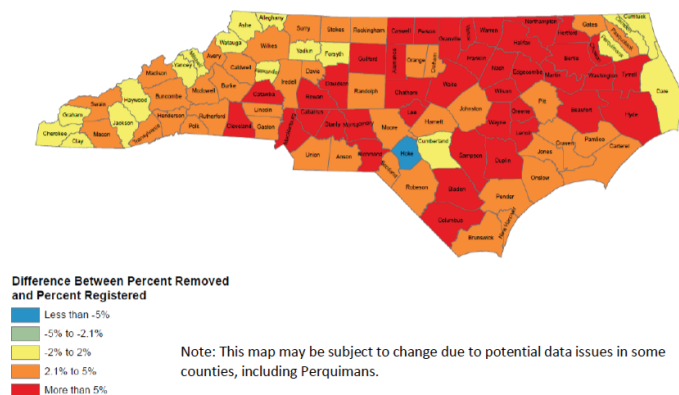
Improve List Maintenance Infrastructure

North Carolina can take simple but impactful steps to ensure that eligible voters can get and stay reg-

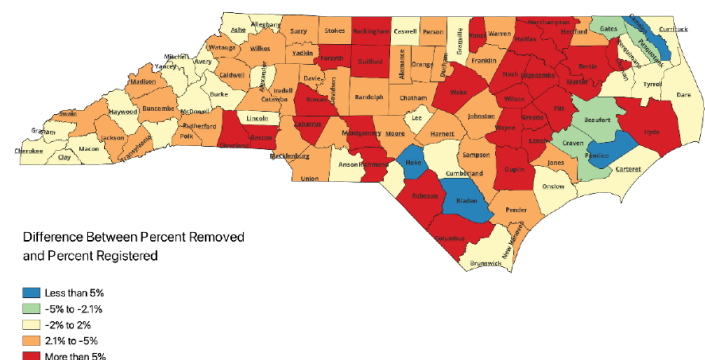
2019 List Maintenance / Percent Removed - Percent Registered
(Black Voters)



2021 List Maintenance / Percent Removed - Percent Registered
(Black Voters)



2023 List Maintenance / Percent Removed - Percent Registered
(Black Voters)



istered. This includes providing the resources for sorely needed updates to the state's voter registration list maintenance systems and database, enacting automatic voter registration, and joining the Electronic Registration Information Center (ERIC).

About half the states in the United States have adopted automatic voter registration, a process

in which eligible individuals are automatically registered to vote when interacting with certain government agencies such as the department of motor vehicles but can “opt-out” of registering to vote if they desire.¹⁵

ERIC¹⁶ is a non-profit created in 2012 by state election officials from seven states to help improve the accuracy of state voter rolls and register more eligible Americans to vote. ERIC does this by allowing states and governments across the country to securely share voter registration lists and use this information to eliminate duplicate voters across states, remove dead voters from the rolls, find people who voted twice, and register voters who move to new locations. Among other cost-saving measures, ERIC has the added benefit of cutting costs for election administration by providing data sources the states otherwise could not purchase on their own. In 2023, the North Carolina General Assembly passed a bill that would prohibit the state from joining ERIC. This decision came after several other states left ERIC due to sustained disinformation campaigns rooted in election denialism.

Reduce Reliance on Mail Deliverability to Assess Voter Eligibility

Some voters whose names were removed from the voter rolls have reported they never received a confirmation mailing from their county board. And as we have previously reported, the [unreliability of mailing confirmation cards](#)¹⁴ is well documented.

North Carolina can reduce its reliance on mail deliverability by changing the type and number of returned mailings that lead to a voter’s removal. There are several ways North Carolina could reduce reliance on mail deliverability, including reducing the type and number of mailings that would trigger list maintenance if returned undeliverable. Some mail pieces are required by statute to be returned if they are undeliverable, including mail ballots and address verification notices. A returned notice may then trigger list maintenance. To minimize the risk of removing voters whose mail is returned through no fault of their own,

election officials should avoid requiring the return of undeliverable mail unless mandated by law. Where mail is not specific to a single voter, such as information guides, election officials should also address those mail pieces to households.

North Carolina can also reduce reliance on mail deliverability by providing resources for county boards of elections to use alternative means to reach out to voters flagged for removal based on mail undeliverability, including email and text, when provided by the voter.

Voter Education

Voter education is also crucial to ensure that voters are aware of list maintenance, know how to keep themselves registered, and know how to vote if they are mistakenly taken off the voter registration rolls. Specifically, voters need to understand why responding to confirmation mailings within 30 days is essential to prevent their disenfranchisement.

Furthermore, voters need to know of their right to cast provisional ballots if they show up to vote and are not registered. They also need to be advised that if they have been removed, they can register again during the early voting period.

SCSJ furthers this work by offering resources and information, including our [Combating Wrongful Voter Purges toolkit](#)¹⁷, and co-running the [N.C. Election Protection Hotline](#)¹⁸ on Hotline during elections to help voters with registration issues, among other initiatives.

Contact: Hilary Klein hilaryhklein@scsj.org

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For more information visit www.southerncoalition.org.

15. See “Automatic Voter Registration,” National Conference of State Legislatures (Sept. 24, 2024), <https://www.ncsl.org/elections-and-campaigns/automatic-voter-registration>.

16. <https://ericstates.org/>; see also <https://southerncoalition.org/resources/eric>

17. <https://southerncoalition.org/resources/combating-wrongful-voter-purges>

18. <https://southerncoalition.org/resources/utilizing-the-election-protection-hotline/>