

October 20, 2025

US Election Assistance Commission
633 3rd Street NW, Suite 200
Washington, D.C. 20001

Re: Comment Opposing America First Legal Foundation Petition to Add Documentary Proof of Citizenship Requirement to National Mail Voter Registration Form [DOCKET NUMBER EAC-2025-0236]

National Council of Jewish Women (NCJW), a 132 year old organization committed to upholding the rights and dignity of women, children, and families around the United States, submits this comment in opposition to America First Legal Foundation's petition to amend the federal voter registration form to require a passport or other documents to prove citizenship. This petition creates unnecessary obstacles that would prevent millions of citizens from accessing the ballot.

NCJW believes that every citizen must be able to exercise the full spectrum of rights their citizenship affords and that voters be able to participate in elections without undue barriers. We believe we have a responsibility to pursue the Jewish value of *tzedek*, or justice, above all else — and ensuring equal access to the ballot box is the foundation of a just democracy. Proof of citizenship requirements will harm, not protect, our democracy. We urge the Election Assistance Commission (EAC) to protect the right to vote for American citizens and reject the America First Legal Foundation's petition.

The petition asks the EAC to impose an illegal and unnecessary requirement to show a passport or other proof of citizenship when using the federal voter registration form that would effectively bar millions of Americans from casting a ballot by imposing severe barriers to registration. The EAC has already [rejected](#) multiple attempts to require documents like a passport or birth certificate on the federal voter registration form, recognizing that doing so would both contravene federal law and block eligible American citizens from voting. There is no new evidence or legal change to justify reversing that longstanding position.

America First Legal Foundation's petition seeks to add red tape to the way American citizens register to vote and update their voter registration information. Millions of eligible American citizens — [students, people of color, rural residents, lower-income and working-class individuals, and married women](#) — face serious difficulties in obtaining or accessing the documents required by this petition, which only permits the use of a passport or other documentation to prove citizenship that many people do not possess. Approximately [146 million Americans](#) do not have a valid passport and more than [21.3 million people](#) — nearly 9.1% of voting-age US citizens — do not have documents like a birth certificate, passport, naturalization certificate, or citizenship certificate readily available to prove citizenship. Obtaining these documents is not always easy: between [logistical and financial hurdles](#), many communities cannot afford or easily access these documents.

Requiring a passport or other documentation that very few people have access to poses an immense threat to American voters. When states have imposed additional and unnecessary documentation requirements for citizens to register to vote for state elections, we have seen the severe risk of blocking eligible American citizens from being able to vote. For example, Kansas blocked [over 30,000 residents](#) from registering to vote in a two-year experiment with requiring additional documentation for voter registration, over 99% of whom — by the state's own admission — were US citizens. Similarly, earlier this year, there were several recorded instances of [married women being blocked from the ballot box](#) and ultimately even disenfranchised because of New Hampshire's law requiring additional and unnecessary documentation for voter registration.

Adding new documentation requirements to the federal form would also violate federal law. The National Voter Registration Act (NVRA) spells out the requirements for the content of the federal voter registration form, permitting the form to require “only such identifying information” that is “necessary” to determine eligibility to register. The NVRA requires attestation under the penalty of perjury that the registrant is a US citizen. It does not require, or permit, separate documentation of citizenship.

This dangerous petition perpetuates a false narrative that scores of noncitizens are voting in our elections, stoking anti-immigrant sentiment in order to put up barriers for millions of eligible voters to cast their ballot. Federal law prohibits non-citizens from voting in federal elections, and the federal form already requires applicants to swear that they are US citizens. And, states already have laws and practices in place that effectively ensure only American citizens vote.

The data shows that these safeguards are working: non-citizen voting is practically non-existent. For example, Louisiana recently performed an audit of election records going back to the 1980s. In reviewing over 40 years of election records, the state identified only 390 people who *may* not be citizens on the state's voter rolls, with [only 79](#) of those having cast a ballot in nearly half a century. Over that same period, experts estimate that at least 74 million votes were cast in the state.

Ensuring election integrity is vital to our democracy and public trust in elections, but actions to protect our elections must be carried out in a way that meaningfully addresses real threats and does not disenfranchise millions of American citizens. Requiring a passport or other documentation that very few American citizens possess on the federal form would not enhance election integrity. Instead, it would threaten the right to vote for millions of citizens — including married women, lower-income and working-class citizens, and communities of color — and will fundamentally disrupt democracy's sacred promise of ensuring every voice is heard.

NCJW urges the EAC to oppose the petition requesting new documentation requirements on the federal voter registration form and to reject this attempt to limit access to the ballot for millions of citizens.

National Council of Jewish Women