



STATE OF RHODE ISLAND

**DIVISION OF MOTOR VEHICLES**

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February 6, 2024

The Honorable Evan P. Shanley  
Chair, House Committee on State Government and Elections  
State House  
Providence, RI 02903

**RE: 2024 H-7393 - AN ACT RELATING TO ELECTIONS – REGISTRATION  
OF VOTERS**

Dear Chairperson Shanley:

The Division of Motor Vehicles (“DMV”) writes to express concerns with House Bill 7393, An Act Relating to Elections-Registration of Voters.

The proposed bill would alter the automatic voter registration (“AVR”) process at the DMV from the current front-end process, where applicants for driver’s licenses and identification cards are afforded the opportunity to decline to register to vote at the time of their DMV transaction, to a back-end process where applicants complete their transaction at the DMV and are afforded the opportunity to decline to register to vote through a process that will be established by their local board and that must be completed within fourteen (14) days of receipt of their voter registration notification. The proposed bill would also require the DMV to differentiate and take corresponding action among applicants who provide an identification document that demonstrates United States citizenship, applicants who provide an identification document that does not demonstrate United States citizenship but does not demonstrate lack of United States citizenship, and applicants who provide an identification document that demonstrates lack of United States citizenship.

Rhode Island adopted its current front-end AVR process in the fall of 2017. Following extensive collaboration between the Department of State (and its consultant, the Center for Civic Design), the Board of Elections, and the DMV, which included a thorough review of and agreement on changes to DMV’s credential forms and online credential transactions, front-end AVR was successfully implemented at the DMV on June 11, 2018. Since that date the DMV has fulfilled its AVR obligations and continues to seamlessly provide the front-end opt-out process when conducting credential transactions. DMV customers appreciate the current, efficient voter registration process that does not increase

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the amount of time it takes them to complete their transaction. The proposed bill would unnecessarily complicate this otherwise simple process by imposing additional burdens on local boards of canvassers and individuals who wish to opt out, requiring them to mail in a separate notice within a very limited time period.

Switching from a front-end to a back-end AVR process would require the DMV to expend significant time and resources to again revise its credential forms and online credential transactions. These required changes will likely also cause complications in license and ID card transactions that will result in increased transaction times for some applicants. While the DMV will do as directed by law, we caution against expending resources to make changes to the current front-end AVR process that has proven to be an effective method for registering voters at the DMV.

The proposed bill's requirement that the DMV differentiate and take corresponding action based on whether the identification document provided demonstrates citizenship is a deviation from our current business practice. The identity documents accepted by the DMV to obtain a license or ID are largely mandated by the federal Real ID Act, and its implementing regulations, and are provided to demonstrate an applicant's legal status. Shifting the focus on identity documents from legal status to citizenship, or lack thereof, would require additional staff training for a purpose that is not essential to one of the DMV's core functions. It will also require the expenditure of significant time and resources to implement and lead to increased transaction times due to likely customer confusion. Additional clarity on the proposed process is needed to determine the full scope and cost of the required changes.

Finally, Section 17-9.1-7 (b)(4) of the proposed bill raises additional concerns. That section imposes certain obligations on the DMV in license and identification card transactions if the DMV has voter registration information that it has obtained from the Secretary of State. Under current business practice, however, the information flow between the two agencies is strictly one way. In what is a fairly seamless and automated process, the DMV sends a record to the Secretary of State as to whether the applicant wishes to be automatically registered or has chosen to opt out. There is, however, no mechanism by which the Secretary of State sends any voter information back to the DMV. The reason for this is that the DMV is not a repository for voter registration information.

The DMV looks forward to working with the sponsor going forward to draft revisions to the proposed bill that are mutually agreeable and that continue the effective and efficient process of voter registration at the DMV.

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Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Walter R. Craddock". The signature is written in a cursive style with a large initial "W".

Walter R. Craddock, Esq.  
Administrator

Cc: Honorable Mary Messier  
Honorable Members of the House Committee on State Government  
And Elections  
Nicole McCarty, Esquire, Chief Legal Counsel to the Speaker  
Thomas A. Verdi, Director, Department of Revenue