



**Testimony of Ricardo Lujan Valerio, Deputy Chief of Staff – Government Relations
Regarding HB 3470
House Committee on Rules
March 12th, 2025**

Chair Bowman and Members of the Committee,

The Secretary of State's Office is committed to ensuring that our election processes are secure, accurate, and in full compliance with both state and federal laws. We appreciate and understand the intent behind HB 3470, in proposing that the Secretary of State must verify the citizenship status of individuals before forwarding voter registration information from ODOT to county clerks. As previously stated by this new administration, we are currently taking every measure to assess areas of optimization across our election division.

Both federal and state laws currently mandate that only United States citizens are eligible to register and vote in elections.

- ❖ Federal Law: The National Voter Registration Act of 1993 (NVRA) requires individuals to attest to their U.S. citizenship when registering to vote.
- ❖ Oregon State Law: Chapter 247 stipulates that to register to vote, an individual must be a U.S. citizen, an Oregon resident, and at least 16 years old (with voter eligibility commencing at 18).

While the objective of ensuring that only eligible citizens are registered to vote aligns with our mission, it is important to consider that the requirements of HB 3470 of citizenship verification are already integral components of both federal and state law. The voter registration mistakes uncovered in the fall of 2024 were one of poor implementation and data entry mistakes, not policy. It's also important to highlight that there is no evidence to suggest the system was exploited with intent. The data shows that the process to register and the penalties for subverting our registration process are effective. This incident was a matter of efficient and effective administration of our policies and not one of exploitation.

All states face significant challenges and obstacles, including logistical complexity, legal disputes, and financial burdens. Implementing citizenship verification requirements beyond the ones that already exist often require creating or integrating disparate databases, which can be costly and technologically demanding. States currently have to rely on inconsistent, outdated, and incomplete data sources, increasing the risks of errors. Potential violations of federal laws, such

as the National Voter Registration Act, can already lead to lengthy and costly legal battles. Errors in data matching can mistakenly disenfranchise eligible voters, particularly naturalized citizens and individuals with common names.

We take our responsibility to ensure the integrity of the voter rolls seriously. That is why we have worked collaboratively with the Oregon Department of Motor Vehicles (DMV) to implement several additional safeguards, including:

- ✓ Hiring a Voter Registration Integrity Analyst focused on ensuring the accuracy and integrity of voter registration data and processes.
- ✓ System improvements to the data transfer process with daily managerial reviews implemented to enhance accuracy and quality assurance.
- ✓ Ongoing audits with random samplings of AVR files to verify eligibility and compliance.
- ✓ A commitment to implement further controls and safeguards that are identified in the Baker Tilly audit being conducted by DAS.

Additionally, the controls that DMV has recently implemented appear to be working to reduce the number of data entry errors related to citizenship status. The Secretary of State's Office remains dedicated to upholding the integrity of Oregon's elections. This will be achieved through our office's efforts to proactively and aggressively ensure that DMV and other voter registration efforts follow existing state and federal law that mandates that only citizens are registered to vote.