



OAG

Office of the Auditor General

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Doug A. Ringler, CPA, CIA
Auditor General

August 28, 2026

The Honorable Winnie Brinks
Senate Majority Leader
State Capitol Building
Lansing, Michigan
and
The Honorable Aric Nesbitt
Senate Minority Leader
State Capitol Building
Lansing, Michigan
and
Christina Anderson, Chief of Staff
Michigan Department of State
Richard H. Austin Building
Lansing, Michigan

The Honorable Matt Hall
Speaker of the House
State Capitol Building
Lansing, Michigan
and
The Honorable Ranjeev Puri
House Democratic Leader
State Capitol Building
Lansing, Michigan

Senators Brinks and Nesbitt and Representatives Hall and Puri and Chief of Staff Anderson:

This is our examination of selected procedures used by the Department of State to maintain and update the voter rolls, as required by Public Act 22 of 2025, Section 631.

To develop this information, we reviewed laws, conducted agency inquiries regarding selected procedures, reviewed publicly available voter information, obtained a list of active driver licenses and state identifications from the Customer and Automotive Records System (CARS), obtained a list of deceased records from the Michigan Department of Health and Human Services (MDHHS) Vital Records File, and obtained Qualified Voter File (QVF) registrations and voter history. Although we have no reason to question the accuracy, we did not audit the data obtained from CARS, MDHHS Vital Records File, or QVF.

Our examination is limited in scope and, although accurate to the best of our knowledge, it is not intended to provide a full performance audit completed in accordance with Government Auditing Standards issued by the Comptroller General of the United States. Therefore, it would not necessarily disclose the presence or absence of any material or reportable conditions, and we did not express an opinion as to the effectiveness or efficiency of the selected procedures examined.

If you have further questions, please do not hesitate to contact our office.

Sincerely,

Doug Ringler
Auditor General

Enclosures

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Background

Authority:

The Michigan Election Law* (Sections 168.1 - 168.992 of the *Michigan Compiled Laws*) is the law governing elections in the State of Michigan.

Who can register to vote in Michigan and how does someone register?

Individuals must be:

- a citizen of the United States,
- at least 16 years old to pre-register and at least 17 ½ years old to register,
- a resident of Michigan,
- a resident of the township or city and,
- not currently serving a sentence in jail or prison.

How to register to vote:

- at SOS branch offices or authorized automatic voter registration agencies*.
- at a local clerk's office.
- by mail.
- online.

Description:

Section 168.509o of the *Michigan Compiled Laws (MCL)* states the Secretary of State (SOS) shall direct and supervise the establishment of a Statewide Qualified Voter File* (QVF). QVF serves as the official record to identify all registered electors* and their precincts for the conduct of all elections held in Michigan.

Elector records are updated through various parties, including local election officials, SOS branches, and SOS online voter registration applications. According to *MCL* Section 168.509r, local clerks are responsible for verifying the accuracy of the names and addresses of registered electors in QVF, and SOS is responsible for maintaining the systems necessary for the operation of QVF.

* See glossary at end of report for definition.

As of March 6, 2026, QVF contained 8.3 million registered electors, and we summarized 19.7 million voting history records throughout 15 general, primary, regular, and special elections:

Election Date	Election Type	Number (Percentage) of Votes Cast Per QVF Voter History					
		Absentee	In-Person				Total
			Election Day	Early Voting			
August 2, 2022	Primary	1,137,527 (53%)	1,023,104 (47%)	0 (0%)	0 (0%)	2,160,631	
November 8, 2022	General	1,890,679 (42%)	2,596,283 (58%)	0 (0%)	0 (0%)	4,486,962	
May 2, 2023	Regular	253,613 (71%)	105,504 (29%)	0 (0%)	0 (0%)	359,117	
August 8, 2023	Primary	146,710 (71%)	59,131 (29%)	0 (0%)	0 (0%)	205,841	
November 7, 2023	General	481,535 (65%)	252,674 (34%)	4,627 (1%)	0 (0%)	738,836	
January 30, 2024	Special	13,896 (90%)	1,596 (10%)	0 (0%)	0 (0%)	15,492	
February 27, 2024	Primary	1,062,780 (55%)	775,377 (40%)	78,093 (4%)	0 (0%)	1,916,250	
April 16, 2024	Special	15,914 (82%)	3,612 (18%)	0 (0%)	0 (0%)	19,526	
May 7, 2024	Regular	185,471 (74%)	65,744 (26%)	671 (0%)	0 (0%)	251,886	
August 6, 2024	Primary	1,208,944 (60%)	734,839 (36%)	73,531 (4%)	0 (0%)	2,017,314	
November 5, 2024	General	2,238,371 (39%)	2,245,693 (39%)	1,214,442 (21%)	0 (0%)	5,698,506	
May 6, 2025	Regular	222,702 (71%)	91,305 (29%)	570 (0%)	0 (0%)	314,577	
August 5, 2025	Primary	260,712 (72%)	94,743 (26%)	7,871 (2%)	0 (0%)	363,326	
November 4, 2025	General	702,209 (64%)	371,888 (34%)	16,475 (2%)	0 (0%)	1,090,572	
February 3, 2026	Special	30,429 (67%)	14,689 (32%)	492 (1%)	0 (0%)	45,610	
Total		9,851,492	8,436,182	1,396,772		19,684,446	

Note: Bureau of Elections (BOE) informed us QVF history is based on clerk-submitted voter records from the Election Day Electronic Poll Book (EPB). After election day, the vast majority of local clerks upload their EPB data in a timely manner, however some clerks do not. Untimely submissions are the primary reason the QVF history does not match the voter turnout statistics housed on county clerk websites, which are based on tabulator totals certified through the canvassing process.

QVF Attributes

Authority:

MCL Section 168.509q requires the QVF to contain a name, residence address (if any), city, state, zip code, date of birth, county, jurisdictional information such as city, township, village, and school district, precinct and ward numbers, a unique identifying number, and a five-year voting history. The Help America Vote Act of 2002, Public Law 107-252 also requires the computerized statewide voter registration file to assign a unique identifier to each legally registered voter.

BOE Assertions:

QVF edit checks ensure the name, residence, address (if any), city, state, zip code, and date of birth data fields contain valid data.

OAG Validation:

We reviewed selected QVF data fields to identify blank fields for voter identification number, first name, last name, state, zip code, address, or date of birth. In addition, we reviewed individuals over the age of 122, state or zip codes other than Michigan, and duplicate voter

identification numbers. Of the 8.3 million registered electors in the QVF, 99.99% had completed fields (8 did not), were between the ages of 17 ½ and 122 (73 were under 17 ½ and 653 were over 122), had an appropriate state or zip code, and had a unique voter identification number.

QVF Additions and Modifications

Automatic Voter Registration

Authority:

Automatic voter registration became effective on December 22, 2018, via an amendment to Article 2, Section 4 of the Michigan Constitution approved by Michigan voters. *MCL* Section 168.493a requires the SOS to automatically register or preregister to vote any individual meeting the qualifications of an elector and submitting an application for a driver license or state personal identification card, if the individual is not already registered to vote. In addition, the *MCLs* require the SOS to automatically register individuals to vote who submit a change of address for a driver license or state personal identification card, if the individual is not already registered to vote. SOS must send written notice to electors when they have been registered to vote, at which point electors may decline the voter registration by returning the prepaid postage form. BOE is also required to report monthly on the number of individuals who were registered or preregistered to vote, the number of individuals who declined automatic voter registration, and the number of individuals whose address was updated in QVF to reflect the residence address in the Customer and Automotive Records System* (CARS).

BOE Assertions:

BOE's Election Official Manual states individuals meeting the age, residency, and citizenship requirements to register or preregister to vote, and conducting a driver license or state personal identification transaction in CARS, will be automatically registered to vote but will be given an opportunity to decline the voter registration.

BOE publishes a monthly report made available on their website summarizing the number of individuals registered and preregistered to vote and the number of individuals who declined voter registration.

OAG Validation:

We compiled BOE's monthly reports for automatic voter registrations, preregistrations, opt-outs, and address updates to QVF from July 2025 through May 2026.

We noted between 2024 and 2026 the number of registered electors in QVF remained stable at approximately 8.3 million electors. In the same period, the number of cancellations in a year fluctuated between 129,128 and 437,169. Cancellations fluctuate on a two-year cycle because of the required waiting period to cancel a voter's registration under the National Voter Registration Act. Upon review of the reports, it appeared over 1.3 million automatic voter registrations occurred between July 2025

* See glossary at end of report for definition.

and May 2026. Based on the number of known cancellations each year, we did not believe these reports accurately stated the number of individuals who were registered through the automatic voter registration process. BOE confirmed the monthly reports were inaccurate and completed a detailed review of the June 2026 published report in which it listed AVR counts as 173,376. BOE concluded the number of AVR new registrations was approximately 19,000. This preliminary estimate suggests new registrations were overreported and changes of address were underreported by approximately 154,000.

Changes to Driver Licenses and State Personal Identification Cards

Authority:

MCL Section 168.509r requires the SOS to update QVF when a change of address is recorded on a driver license or state personal identification card.

BOE Assertions:

BOE informed us QVF is updated daily when an individual, with a driver license or state personal identification card number in both CARS and QVF, makes a change in name, address, or date of birth in CARS. However, if a change in name or date of birth occurs in QVF no corresponding change occurs in CARS. In addition, BOE informed us it performs a quarterly full reconciliation between QVF and CARS comparing select information for all registered elector records to all active driver license and state personal identification cards. As of March 6, 2026, the last time BOE performed a quarterly full reconciliation was January 12, 2026.

OAG Validation:

We completed a match of the 8.3 million QVF-registered elector records to the 8.0 million CARS active driver license and state personal identification card records as of March 6, 2026. We identified 7.3 million records that matched on driver license or state personal identification card number between the two applications. We compared the name, street number, city, state, zip code, and date of birth between these records and noted 99.7% of the information was identical in both applications.

In the table below, we summarized the number of discrepancies identified in the prior two OAG audits and this review.

Audit or Review	Number
OAG Audit of BOE 231-0235-19 December 2019	84,628
OAG Audit of BOE 231-0235-21 March 2022	72,296
OAG Letter August 2026	18,486

In the current examination we did not sample and audit the discrepancies. However, upon limited review of the data, and as noted in both prior audits, potential reasons for the discrepancies include shortened versions of first or last names (Teri vs. Theresa) and transposed years of birth (1976 vs. 1967).

QVF Cancellations

The Department of State (DOS) and township, city, and county clerks are responsible for updating QVF to cancel registered electors. Registered electors may be cancelled for multiple reasons including death, residency, citizenship, and age. We compiled the table below from QVF for registered electors with a status of cancelled as of March 30, 2026.

Reason	QVF Records Cancelled by Year and Reason					Total
	January 1 through December 31				January 1 through March 30	
	2022	2023	2024	2025	2026	
Residency	45,031	118,080	24,520	333,452	4,814	525,897
Deceased	106,579	97,092	100,228	101,362	24,906	430,167
Voter Requested	3,152	3,620	4,265	2,277	369	13,683
Citizenship	79	73	82	64	23	321
Age	91	51	33	14	3	192
Total	<u>154,932</u>	<u>218,916</u>	<u>129,128</u>	<u>437,169</u>	<u>30,115</u>	<u>970,260</u>

Note: Residency cancellations fluctuate on a two-year cycle because of the required waiting period to cancel a voter's registration under the National Voter Registration Act.

Deceased Electors

Authority:

MCL Section 168.509o(4) requires the SOS to develop and utilize a process by which information obtained through the Social Security Administration Master Death file used to cancel driver license and state identification records of a deceased Michigan resident is also used at least once a month to update QVF to cancel voter registrations of any elector determined to be deceased.

BOE Assertion:

BOE's procedures require use of the following sources of information to assist in maintaining accurate voter rolls:

- Social Security Administration Master Death Index to match records on social security number.
- Michigan Department of Health and Human Services (MDHHS) Vital Records files to match records on first name, middle name, last name, date of birth, and address.
- Multistate Electronic Registration Information Center* (ERIC) to match records on name, date of birth, driver license number or state personal identification card number, and/or the last 4 digits of the electors' social security number.

* See glossary at end of report for definition.

BOE procedures also require BOE to assess the quality of each match before canceling the record.

OAG Validation:

We identified 430,167 electors' records as cancelled in QVF with a reason of deceased between January 1, 2022 through March 30, 2026.

Additionally, we performed a match using first name, last name, and date of birth from QVF voting history by elector as of March 6, 2026 to MDHHS's Vital Records file. Our analysis of QVF voter history for the 15 elections noted below identified 2,582 votes cast (0.01% of the total votes cast) by 2,572 electors who had a status of deceased in QVF as of March 6, 2026 and whose date of death in the Vital Records file was prior to the election date.

Election Date	Cast	Number of Votes Cast by Electors Whose Date of Death was Before the Election Date		
		Early Voting	Absentee	Election Day
August 2, 2022	2,160,631	0	207	1
November 8, 2022	4,486,962	0	472	2
May 2, 2023	359,117	0	58	0
August 8, 2023	205,841	0	25	0
November 7, 2023	738,836	0	93	0
January 30, 2024	15,492	0	3	0
February 27, 2024	1,916,250	2	327	0
April 16, 2024	19,526	0	10	0
May 7, 2024	251,886	0	54	1
August 6, 2024	2,017,314	1	272	0
November 5, 2024	5,698,506	21	714	0
May 6, 2025	314,577	0	64	0
August 5, 2025	363,326	0	81	0
November 4, 2025	1,090,572	0	165	1
February 3, 2026	45,610	0	8	0
	19,684,446	24	2,553	5

Note: In the prior audit, released March 2022, our review of similar information noted a risk of false matches exists due to common names and that 6 clerks indicated in the survey responses they had identified electors inappropriately marked as deceased in QVF.

How can a deceased elector's vote be counted?

Michigan Election Law requires certain activities which may allow the votes of electors deceased as of the election date to be counted, including:

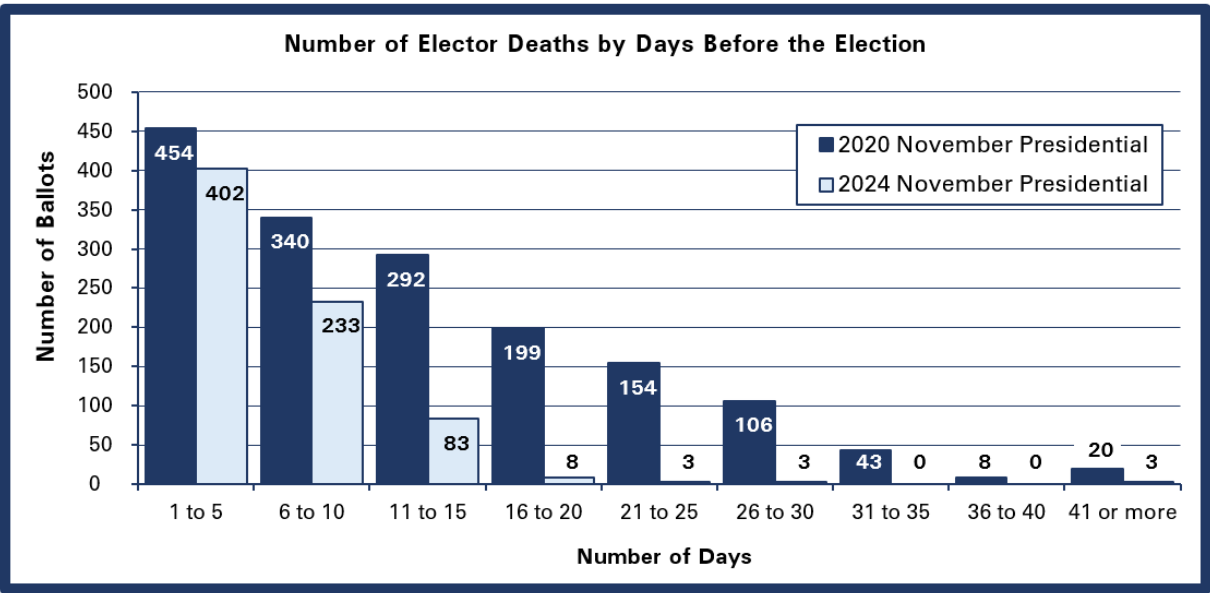
1. Absentee voting, in which electors can obtain a ballot 40 days prior to the election. Electors may die after returning their ballot but prior to the election date. Because of delays between the dates of a person's death, death certification, and formal removal from QVF, election workers may not identify and reject the

absentee ballot of an elector with a date of death close to an election date or tabulation date.

- 2. Absentee Voter Counting Boards participating in early tabulation where electors' ballots can be run through the tabulator beginning 8 days prior to the election date. As noted in item 1, due to delays in receiving death notifications, election workers may not identify and reject the absentee ballot of a person with a date of death close to the tabulation date.
- 3. Early voting up to 10 days before the election. Electors vote on-site and run their ballot through the tabulator prior to the election date. If electors die after early voting but before election day, their vote will count even if the death is known to the jurisdiction because once the ballot is run through the tabulator it can no longer be traced back to a particular elector.

We noted the date of death for 2,537 (99.4%) of 2,553 absentee votes cast by a deceased voter occurred within 40 days of the election date. In addition, all 24 deceased early voters died within 10 days of the election date which is when the time period for early voting begins.

We compiled the following table to compare the 1,616 votes cast in the November 2020 presidential election, obtained from the prior audit issued March 2022, and the 735 votes cast in the November 2024 election.



We also completed a match using first name, last name, and date of birth between QVF-registered electors to MDHHS's Vital Records file and noted 17,829 QVF records matched a deceased record. As this match was not based on a unique identifier such as a social security number or driver license or state personal identification card number, we performed further procedures to assess the quality of the match. We analyzed these individuals and noted 4,642 (26%) had a status indicating they were sent a notification (for any reason) and were scheduled for future cancellation. We

randomly selected 20 of the 17,829 individuals and could not locate an online obituary for 8 (40%) based on a match on name and date of birth.

While this type of match identifies electors for further review, the overall quality of the match is not sufficient for it alone to be used to cancel a registered elector's voter registration. This is consistent with BOE's procedures in which they also assess the quality of the match prior to initiating cancellation.

Surrendered Licenses

Authority:

MCL Section 168.509aa requires the SOS to send a notification to a registered elector if SOS receives a surrendered Michigan driver license. If the elector does not respond and does not have any voting activity by the second even-year November federal election following the notice, the voter's registration is cancelled and the elector's name will be removed from QVF. The National Voter Registration Act of 1993, Public Law 103-31 requires this two-election cycle waiting period.

BOE Assertions:

BOE's Election Official Manual requires that upon receipt of a surrendered license a notification letter will be sent to the individual's mailing address. SOS has an automated process for mailing this notification. The registered elector's status in QVF is updated and the two-election cycle countdown to cancel the record begins. If registered electors reply they have not moved, vote in an election, or engage in a voter transaction the cancellation countdown in QVF is removed from the record.

OAG Validation:

Our review of QVF data as of March 6, 2026 noted:

- 173,366 registered electors had a status indicating they were sent a notification because of a surrendered license and scheduled for future cancellation if no response is received.
- 411,833 electors had a status of cancelled, a status reason of National Voter Registration Act, and a date of cancellation between January 1, 2022 and March 30, 2026.

Citizenship Notifications

Authority:

MCL Section 168.492 requires an individual to be a citizen of the United States to register as an elector.

MCL Section 168.495 requires voter registration applications to contain a statement the applicant is a citizen of the United States.

BOE Assertions:

In April 2025 BOE released the results of its review to identify individuals who appeared to be non-citizens and cast a ballot in the November 2024 general election*. BOE identified 15 individuals, 13 of whom were referred to the Michigan Attorney General for potential criminal charges.

BOE informed us it implemented a procedure in April 2025 to review QVF voter registration eligibility quarterly when a driver license or state personal identification card transaction resulted in a voter registration eligibility change due to age or citizenship. Individuals identified are run through the Systematic Alien Verification* for Entitlements (SAVE) search and if the search identifies individuals as non-citizens, BOE mails a notice to the individuals indicating they were registered in error. If no reply is received within 30 days, the notification returns undeliverable, or the reply does not affirm eligibility the individuals' registration is marked in QVF as rejected.

OAG Validation:

Our review of QVF data identified:

- 321 electors' records were cancelled with a reason of citizenship between January 1, 2022 through March 30, 2026.
- The table below summarizes the number of records rejected with a reason of citizenship or voter registered in error, between January 1, 2022 and March 30, 2026.

QVF Records Rejected by Year and Reason						
Status Reason	January 1 through December 31				January 1 through March 30	Total
	2022	2023	2024	2025	2026	
Rejected - Citizenship	11	43	18	7	3	82
Rejected - Voter Registered in Error*	6	8	105	209	19	347

*"Voter Registered in Error" is a status reason assigned to individuals identified as non-citizens in BOE's procedures.

We compared the active records identified as non-citizens in CARS to registered electors in QVF as of March 6, 2026 to independently assess the quality of the CARS field for determining citizenship. We identified 18,523 registered electors within QVF that were identified as non-citizens in CARS. We randomly selected 25 electors and requested BOE run them through SAVE. BOE's results identified 9 (36%) electors as non-citizens. Our review of QVF noted none of the 9 non-citizens had any voting history from January 1, 2022 through March 6, 2026.

* See glossary at end of report for definition.

Our review demonstrates that the citizenship field alone in CARS is not sufficient to determine citizenship and additional confirmation of citizen status should occur prior to canceling individuals in QVF.

BOE provided the following response regarding the status of the reported findings from our March 2022 (231-0235-21). We did not audit the accuracy of its responses.

BOE Response:

Thank you for the opportunity to share information about our progress to address remediations to prior audit findings. All milestones associated with the four deficiencies are complete:

#1: Full reconciliation between driver license file* (DLF) and QVF needed

- In October 2021, BOE performed a reconciliation that identified all deceased individuals in the current DLF and updated QVF accordingly.
- BOE implemented a process in March/April 2022 to establish an ongoing quarterly reconciliation between the DLF system and QVF to assist with decreasing the number of address mismatches between the systems and assist with updating deceased records.

#2: Security configuration controls over electronic poll book (EPB) should be improved

- BOE implemented changes to the security configurations to address the issues identified by OAG and removed protected information from the public web.
- BOE updated the method for accessing EPB, and previous information discussing EPB access is no longer applicable.

#3: Improved controls needed to ensure proper oversight and reporting of post-election audits

- BOE instituted the capability to send confirmation of audit submission to both county and local clerks upon completion.
- BOE improved its online interface which makes it easier for County Clerks to submit their audit results and to facilitate BOE staff review of results. The process ensures that all completed worksheets include a specific field where clerks must indicate that the hand count of the race specified by BOE was completed. This continues to be improved to make it easier for clerks to use.
- BOE instituted written protocols where BOE staff regularly review all audit results submitted via the online interface and report concerns to management.
- BOE added a staff member to bring greater focus and support for post-election audit certification and related procedures.

#4: Post-election audit training and certification programs need improvement

- BOE replaced its previous training module and now assigns a formal certification course for post-election audit training for county staff within its eLearning system. This requirement is communicated to County Clerks and other county officials conducting post-election audits. BOE brought on a staff member to focus on eLearning and improve the platform and the experience for clerks overall.

* See glossary at end of report for definition.

- BOE now requires clerks to designate a staff member for assignment of the formal certification course for new clerks who will be conducting audits.
- BOE has documented procedures for monitoring and escalating the assignment and successful completion of training by county staff. Upon completion, eLearning is configured to only include the names of certified election officials for selection when submitting the post-election audit form. BOE also developed an acknowledgement for county staff to attest that the primary people who conducted the post-election audit are certified in the eLearning system.
- BOE implemented a process to assign training materials to city and township clerks in the eLearning center as opportunities for improvement. These assignments are made based on the review of the jurisdiction's post-election audit. Based on the needs of the jurisdiction, these could be resources, virtual training, or arranging for onsite instruction.



OAG

Office of the Auditor General

Glossary of Abbreviations and Terms

automatic voter registration agencies

State agencies, designated by the secretary of state, who in the regular course of business collect sufficient information, including through documents or database verification, to confirm the eligibility for voter registration or the updating of information for an existing voter registration.

BOE

Bureau of Elections.

Customer and Automotive Records System (CARS)

An information system consisting of multiple integrated modules and subsystems that provide motor vehicle agencies with a single-source solution for the complete administration of driver licensing and personal identification numbers.

driver license file (DLF)

The SOS data file that contains driver licenses and includes state personal identification numbers.

elector

A United States citizen who has attained the age of 18 years and has resided in Michigan for six months.

EPB

Electronic Poll Book.

general election

The election held on the November regular election date.

MDHHS

Michigan Department of Health and Human Services.

Michigan Election Law

Sections 168.1 - 168.992 of the *Michigan Compiled Laws*.

Qualified Voter File (QVF)

The official file of voters for the conduct of all elections held in the State.

registered elector

An elector who has registered to vote.

SOS

Secretary of State.

**Systematic Alien
Verification for
Entitlements (SAVE)**

An online service for registered federal, state, territorial, tribal, and local government agencies to verify immigration status and U.S. citizenship of applicants seeking benefits or licenses.