The 'SAVE' Tool Could Disenfranchise U.S. Citizens

More transparency and testing is required before a new federal tool to identify noncitizens is applied to state voter rolls.

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Executive Summary

While efforts by the Trump administration to expand an immigration data system for verifying voting eligibility might initially sound like a sensible solution, in reality it is likely to create far more problems than it would solve. The administration is slapping together notoriously clunky systems in search of a needle in a haystack. The system's complexity and the Department of Government Efficiency's (DOGE) inexperience and poor record for accuracy make this a high-stakes recipe for technical problems — and one where American citizens are likely to be unfairly ensnared in the process.

- Noncitizen voting is extremely rare, but has become a major focus among those questioning the validity of U.S. elections. The states already have processes to verify the citizenship of voter registrants, and the federal government has historically shared citizenship data cautiously, aware of its systems' limitations and the potential to disenfranchise U.S. citizens.
- DOGE and the Department of Homeland Security (DHS) have recently expanded an existing U.S. Citizenship and Immigration Services (USCIS) system, Systematic Alien Verification for Entitlements (SAVE), to address noncitizen voting and check the citizenship status of all U.S. citizens without providing information on how this was accomplished or the accuracy of the resulting tools. Early reports suggest an error rate as high as 17%.
- These efforts involve complex technical challenges that, when previously attempted, have resulted in errors and disenfranchisement of American citizens.
- When external non-experts get involved in maintaining a state's voter rolls, they have consistently gotten it wrong. DOGE specifically does not have a good track record in dealing with large and complex systems. They have mistakenly fired crucial federal employees, consistently misinterpreted Social Security data, and have been accused of illegally misusing sensitive personal information.
- Because the potential consequence of failure is the disenfranchisement of American citizens, we must ensure the absolute highest level of confidence when removing records from the voter rolls. To date, neither the Social Security Administration (SSA), DHS, nor DOGE have offered any information concerning how the new SAVE expansions were implemented, nor have they provided any evidence confirming the new system's accuracy.
- Until such transparency and verification have been established, it would be irresponsible to consider this new system as the final source of truth when it comes to voter eligibility.

Introduction

While the data consistently show¹ that it is exceedingly rare, noncitizen voting has emerged as a central component of the decreased confidence in our elections. States already take many steps to confirm the citizenship of those who register to vote, and the federal government has long shared information on citizenship status with the states, but done so in a careful way and with a recognition of the inherent deficiencies of their data systems.²

On March 25, President Trump issued an executive order that, among other things, directed the Department of Homeland Security (DHS) and DOGE to review states' public voter rolls and identify individuals who are illegally registered to vote.³ On April 22, DHS and DOGE announced an imminent overhaul of the Systematic Alien Verification for Entitlements (SAVE) system.⁴ One month later, they provided an update stating that the system was ready for states "to help verify U.S. citizenship and prevent aliens from voting in American elections."⁵ Reports also indicate that DOGE has been collaborating with the Department of Justice (DOJ) to identify and prosecute noncitizen voters in every state.⁶

These moves may seem like common sense, but they are fraught with technical complexity and are being carried out by actors with less-than-stellar track records who are unfamiliar with the data. While access to more accurate and intelligible eligibility data could be invaluable to election administrators, it is unclear what the federal government is offering in this instance. More transparency and accuracy testing are necessary before anyone can truly have confidence that these new tools are up to the task and won't disenfranchise or otherwise burden eligible U.S. citizens.

¹ https://www.brennancenter.org/our-work/research-reports/noncitizen-voting-missing-millions

 $^{^2 \, \}underline{\text{https://fairelectionscenter.org/wp-content/uploads/2025/07/SSA-Touhy-Decision-letter.July-13-2023-signed.pdf} \\$

³ https://www.whitehouse.gov/presidential-actions/2025/03/preserving-and-protecting-the-integrity-of-american-elections/

⁴ https://www.dhs.gov/news/2025/04/22/dhs-uscis-doge-overhaul-systematic-alien-verification-entitlements-database

⁵ https://www.uscis.gov/newsroom/news-releases/uscis-deploys-common-sense-tools-to-verify-voters

 $^{{}^{6}\,\}underline{\text{https://www.democracydocket.com/news-alerts/the-doj-accelerates-its-hunt-for-voter-fraud-with-doges-help/}$

The Trump Administration and State Voter Rolls

The administration's lack of transparency makes it difficult to determine their exact methods for identifying alleged noncitizens on state voter rolls. However, DOGE staff– primarily Antonio Gracias⁷ –and others have mentioned or hinted at two somewhat distinct approaches.

The first approach involves matching Social Security Administration (SSA) data from the Enumeration-Beyond-Entry (EBE) program against voter rolls to identify and prosecute noncitizens who may have voted. The EBE program, which was established during the first Trump administration, provides an expedited means for immigrants legally approved to work in the U.S. to obtain a Social Security number. This approach resulted in 57 referrals for prosecution likely derived from matching individuals with EBE-issued Social Security numbers to state-level voter records. While the exact matching methodology remains unclear, DOGE staff statements suggest they used biographic information to connect records across datasets. Notably, if noncitizen voting occurred at levels Trump and his allies claim, DOGE would likely have flagged far more than 57 cases among the 5 million EBE enrollees (0.00114%). For perspective, a well-conducted DNA test has a likelihood of false positives at around .001%.

The second approach taken by the administration is broader in scope and appears to be their main focus on this front: modifying U.S. Citizenship and Immigration Services' (USCIS) existing Systematic Alien Verification for Entitlements (SAVE) system to better support efforts to identify noncitizens on voter rolls.

SAVE for the Voter Rolls

USCIS maintains immigration status data, accessible through the Systematic Alien Verification for Entitlements (SAVE) system, which determines legal noncitizen residents' eligibility for various government benefits (E.g., WIC, SNAP, etc) by querying multiple USCIS databases.¹¹

Legal immigrants, depending on their specific status, may be eligible for certain government benefits but not others. The states are the primary administrators of state and federal benefits, while the federal government manages immigration. The SAVE system was devised to bridge

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⁷ https://www.nytimes.com/2025/03/14/us/politics/elon-musk-antonio-gracias-social-security-administration.html

⁸ https://oig-files.ssa.gov/audits/full/A-08-18-50472.pdf

https://www.nbcnews.com/politics/trump-administration/live-blog/trump-administration-tariffs-economy-musk-immigration-live-updates-rcna203237#rcrd78221

¹⁰ https://sites.libsyn.com/254861/antonio-gracias-doge-updates-voter-fraud-arrests-finding-big-balls-all-in-live-from-miami

¹¹ https://www.uscis.gov/save/about-save/about-save

this gap and supply state agencies with enough immigration information to make eligibility determinations regarding legal residents.

Because the system was never designed to identify citizens or undocumented immigrants, it relied on unique USCIS immigration identifiers rather than other forms of identification like Social Security numbers. Further, the Government Accountability Office found that many queries submitted to SAVE – about 18.7% (or 3.8 million queries) in 2016 – did not yield a definitive determination regarding citizenship and required USCIS staff to perform additional individualized verification.¹²



[T]hese changes represent a shift from investigating only suspected noncitizens to screening every voter, including U.S. born citizens' registration for citizenship status.

Nevertheless, as a result of a settlement in 2012,¹³ the federal government allowed states access to SAVE to verify the citizenship of registered voters when the state has a DHS-issued immigration identifier for the individuals in question.¹⁴ While in some instances these identifiers are collected by states when a legal resident applies for a driver's license, frequently they are unavailable. In the lead-up to the 2024 general election, three states sued the federal government for access to other USCIS systems that they purported could determine citizenship without the unique immigration identifier.¹⁵ While the election did not resolve these lawsuits, their aim appears to have been addressed by recent changes to the SAVE system made by DHS and DOGE under the new administration, which reportedly allow for bulk requests using Social Security numbers.¹⁶ Concerningly, these changes represent a shift from investigating only suspected noncitizens to screening every voter, including U.S. born citizens' registration for citizenship status.

The extent and success of DHS and DOGE's integration of SAVE with Social Security numbers remain unclear, but early indications are not promising. According to USCIS's SAVE Agency

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https://www.gao.gov/assets/gao-17-204.pdf

¹³ https://dos.fl.gov/communications/press-releases/2012/us-department-of-homeland-security-agrees-to-terms-with-florida-department-of-state-over-legal-status-checks-of-potential-non-citizen-voters/.

¹⁴ https://www.americanimmigrationcouncil.org/research/using-systematic-alien-verification-entitlements-save-program-voter-eligibility

¹⁵ https://www.democracydocket.com/news-alerts/republican-state-officials-sue-biden-administration-over-noncitizen-voting/

https://www.uscis.gov/save/current-user-agencies/news-alerts/optimizing-save-new-options-to-create-cases-with-a-social-security-number-and-by-bulk-upload

Search Tool, 20 states are already registered to use the SAVE system for "Voter Registration and Voter List Maintenance." Additionally, NPR recently reported that USCIS staff have claimed in internal briefings that upwards of 9 million voter records have already been assessed by the new system. While the results of that assessment have not been made public, public records requests suggest that Texas' engagement with the new system is already returning errors for 17% of records when searched for with full SSNs. 19

Perhaps more worrisome, the NPR story also reports on future plans to allow for searches using biographical information and only the last four digits of a SSN, as well as the integration of state DMV data, creating a kind of one-stop shop for voter verification and list maintenance. An error rate of 17% is already untenable, particularly for a system that could be used to determine every U.S. citizen's eligibility to vote, and we should only expect that error rate to increase with the introduction of less rigorous matching criteria.

17 https://www.uscis.gov/save/about-save/save-agency-search-tool?type_of_agency[]=5&benefit_category[]=97&benefit_category[]=98&items_per_page=25

¹⁸ https://www.npr.org/2025/06/29/nx-s1-5409608/citizenship-trump-privacy-voting-database

¹⁹ https://www.texastribune.org/2025/07/22/texas-secretary-of-state-checks-save-database-voter-citizenship/

Inherent Challenges in Matching Across Datasets

The approaches above require DOGE to attempt to match people's records across disparate databases. How they chose to match these records is important because poor methodology produces a higher rate of errors. Despite DOGE's lack of transparency about their procedures, any such data-matching effort would face two fundamental problems:

Issue #1: Without sensitive identifying numbers like SSN or driver's license numbers present in both datasets, the probability of false matches – incorrectly linking records from two completely different individuals – becomes substantial.

Public voter rolls have limited voter information and do not include identification numbers like a voter's SSN or driver's license number. So when DOGE attempted to match a voter in the public voter file to an EBE record in the SSA data, ²⁰ their only options for "match fields" were likely names and DOBs. As research has²¹ repeatedly²² found, ²³ people's full names and dates of birth are simply not that unique when you have 174 million registered voters. ²⁴ Additionally, this non-uniqueness problem is worsened by states that do not provide full dates of birth in their public voter file (for valid voter privacy reasons).

All of this means that if you have two records with the same name and date of birth, it's reckless to say that they are definitely the same person. And prior experience shows that matches done this way were indeed flawed: a system set up by Kansas in 2017 called Crosscheck tried to identify voters who were registered in multiple states by comparing first name, last name, and date of birth. An analysis of Crosscheck found that the program "would eliminate about 200 registrations used to cast legitimate votes for every one registration used to cast a double

²⁰ https://sites.libsyn.com/254861/antonio-gracias-doge-updates-voter-fraud-arrests-finding-big-balls-all-in-live-from-miami</sup>

²¹ http://www.asasrms.org/Proceedings/v2010/Files/307481 58657.pdf

²² https://papers.ssrn.com/sol3/papers.cfm?abstract_id=997888

https://www.cambridge.org/core/journals/american-political-science-review/article/abs/one-person-one-vote-estimating-the-prevalence-of-double-voting-in-us-presidential-elections/F0F11207B6EC1A0A5DE18DC283ACE926#article

²⁴ https://www.census.gov/newsroom/press-releases/2025/2024-presidential-election-voting-registration-tables.html

vote."²⁵ The program was eventually shuttered as part of a settlement over its security and accuracy issues.²⁶

This begs the question: why shouldn't states use the new SAVE service then, since it uses Social Security numbers to query records now? The answer is that we simply don't know how DOGE has incorporated SSA data with the immigration data previously used for SAVE since SSA only has limited data on citizenship. Given their extraordinarily short timeline (four months) for overhauling a massive and notoriously clunky legacy system, it's very possible – even likely – that they've used similarly deficient matching procedures for linking this data together, producing the same problems we've seen in the past. Furthermore, future plans to allow for searching with only the last four digits of a SSN will drastically increase the opportunities for false matches.

Issue #2: Even if you do successfully match records and the information you have does belong to the same person, that information may be out of date or incorrect.

Peoples' circumstances are constantly changing, and the information stored about them in databases never keeps up with those changes in real time. This is a problem we've seen before with the SAVE system. In 2017, North Carolina performed a post-election audit where they found that based on past experience, "a match with the SAVE database is not a reliable indicator that a person is not a U.S. citizen because the database is not always updated in a timely manner and individuals who derived citizenship from their parents through naturalization or adoption may show up as noncitizens in SAVE."²⁷

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²⁵ https://www.washingtonpost.com/news/wonk/wp/2017/07/20/this-anti-voter-fraud-program-gets-it-wrong-over-99-of-the-time-the-gop-wants-to-take-it-nationwide/

 $^{{\}color{blue} {}^{26}} \ \underline{\text{https://www.propublica.org/article/kansas-abandons-technology-trumpeted-by-kris-kobach-trumps-onetime-voter-fraud-czar} \\ \underline{\text{https://www.propublica.org/article/kansas-abandons-trumpeted-by-kris-kobach-trumpeted-by-kris-kobach-trumpeted-by-kris-kris-kobach$

https://s3.amazonaws.com/dl.ncsbe.gov/sboe/Post-Election%20Audit%20Report_2016%20General%20Election/Post-Election_Audit_Report.pdf



Given [DOGE's] extraordinarily short timeline (four months) for overhauling a massive and notoriously clunky legacy system, it's very possible – even likely – that they've used deficient matching procedures, producing the same problems we've seen in the past.

The scale of this issue is not insignificant. According to USCIS, more than 7.9 million people have been naturalized in the last decade, with more than 800,000 in the 2024 fiscal year alone.²⁸ It is unclear what, if anything, has been done to address the delays in updating these individuals' statuses in the SAVE system.

Additionally, no database can be completely accurate all of the time. People make mistakes when filling out forms or when entering data into the system, and even if those mistakes are eventually corrected, incorrect data can still be propagated to other databases and systems. Furthermore, when data are being used beyond the intentions for which they were collected, their meaning can more easily be misinterpreted and the necessary ambiguity they contain—which subject experts would recognize—is more readily lost.²⁹

These issues are only made worse by further incorporating and combining data without the diligence to address all of these potential hurdles. Not only can old or inaccurate data hinder the integration itself, but once combined, resolving conflicts in the matched data can be very challenging. How do you determine which of the original sources was the most up to date and accurate? Any marginal errors that may exist in isolated databases will proliferate when combined if there aren't reliable procedures in place to answer this question.

Repeated Disenfranchisement of American Citizens

These inherent challenges in datakeeping are why American citizens have been repeatedly caught up in states' attempts to purge noncitizens from their voter rolls. This was especially true in the lead up to the 2024 general election, when several states made concerted efforts to identify and remove noncitizen voters, but ultimately caught thousands of legitimate citizens instead. Here is a sampling of these efforts:

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²⁸ https://www.uscis.gov/citizenship-resource-center/naturalization-statistics

²⁹ https://hdsr.mitpress.mit.edu/pub/9zhitrw8/release/1

- Alabama inactivated 3,251 individuals,³⁰ who were identified "by cross-checking the voter rolls with a database of people who had been issued noncitizen identification numbers from the Department of Homeland Security."³¹ Later, they acknowledged that *at least* 2,074 of those individuals were eligible voters.³² One voter was a natural-born U.S. citizen who simply made an error while filling out a form in 2022.³³
- In Virginia, a woman born in Brooklyn,³⁴ a naturalized university student,³⁵ and a native Virginian who failed to check a box³⁶ were all removed in the state's last-minute purge of 1,600 supposed noncitizens.
- Texas cancelled the registrations of 6,500 voters and turned 2,000 over to the attorney general for investigation. However, reporting later revealed that the Secretary of State had only identified 581 of these voters over 3 years as noncitizens. The rest were voters who simply failed to respond to a letter informing them that there were questions about their citizenship. At least 10 of the cancelled voters were actually U.S. citizens, including voters whose records were mislabeled by election workers.³⁷
- Ohio used data from its Bureau of Motor Vehicles when it challenged the citizenship of hundreds of voters, but caught naturalized citizens who had received driver's licenses before their naturalization ceremony.³⁸ Similarly, in 2023, Ohio referred 521 cases of supposed noncitizens committing voter fraud for prosecution. Only one person ultimately ended up being charged.³⁹

³⁰ https://www.npr.org/2024/08/30/nx-s1-5091032/noncitizens-voting-election-gop-texas-tennessee-alabama

³¹ https://www.sos.alabama.gov/newsroom/secretary-state-wes-allen-implements-process-remove-noncitizens-registered-vote-alabama

 $^{^{32} \ \}underline{\text{https://www.npr.org/2024/10/12/nx-s1-5147789/voting-election-2024-noncitizen-fact-check-trump}$

³³ https://www.waff.com/2024/08/29/us-citizen-wrongfully-removed-alabama-voter-list/

³⁴ https://www.npr.org/2024/10/29/nx-s1-5169204/virginia-noncitizen-voter-purge

³⁵ https://www.cnn.com/2024/11/02/politics/us-citizens-caught-in-virginias-voter-purge

 $^{{\}color{red}^{36}}~{\color{blue}\underline{\text{https://www.npr.org/2024/10/29/nx-s1-5169204/virginia-noncitizen-voter-purge}}$

³⁷ https://www.votebeat.org/texas/2024/10/15/greg-abbott-noncitizen-voter-roll-removal-investigation/

³⁸ https://ohiocapitaliournal.com/2024/09/04/citizens-caught-in-ohio-noncitizen-voting-audit-say-latest-letter-offers-incomplete-information/

https://ohiocapitaljournal.com/2023/09/27/ohio-sec-of-state-larose-flagged-more-than-520-cases-of-noncitizen-voter-fraud-only-one-was-legit/

Concerns over External Non-expert **Implementation**

While the objective value of an expanded SAVE system could be debated in good faith, the complexity involved in successfully and accurately implementing SAVE's expansion raises pressing concerns related to the competency of those implementing the changes. In addition to the general complexities described above, state voter registration rolls exist within a very specific context. They vary quite drastically across states (and sometimes across jurisdictions within them), are dynamic, and are subject to electoral cycles as well as numerous state and federal regulations. Whether it was Crosscheck, 40 Cyber Ninjas, 41 or EagleAl, 42 when external non-experts get involved in maintaining state voter rolls, they get it wrong, and here, getting it wrong means that eligible citizens could be disenfranchised.



Whether it was Crosscheck, Cyber Ninjas, or EagleAI, when external non-experts get involved in maintaining state voter rolls, they get it wrong.

DOGE's Questionable Track Record

In this specific instance, where implementation is in the hands of DOGE- who have unabashedly embraced a 'move fast, break things' approach⁴³ - we have serious concerns. DOGE's lack of caution was, perhaps, never more on display than when the federal government had to rehire thousands of critical workers mistakenly fired by DOGE, 44 including health workers at the

⁴⁰ https://archive.ph/0T7ue

⁴¹ https://elections.maricopa.gov/asset/jcr:a9e03750-0a8f-4162-859f-1d46ac54b485/Correcting%20The%20Record%20-%20

⁴² https://www.nbcnews.com/politics/elections/conservative-activists-errors-software-voter-fraud-rcna161028

⁴³ https://www.washingtonpost.com/technology/2025/02/24/doge-fast-cuts-federal-workers-programs-elon-musk/

⁴⁴ https://www.forbes.com/sites/saradorn/2025/04/04/trumps-great-rehiring-over-26000-fired-by-doge-likely-to-return-so-far/

Centers for Disease Control⁴⁵ and weapons inspectors at the National Nuclear Security Administration.⁴⁶

DOGE's handling and discussion of federal data reveals similar carelessness. Elon Musk's claim⁴⁷ that DOGE uncovered 150-year-olds receiving Social Security benefits, for instance, resulted from a misunderstanding of how the database language dealt with birth dates⁴⁸ and how eligibility for benefits is determined.⁴⁹ More troubling, evidence suggests DOGE staffers may have accessed sensitive personal information from SSA data in contravention of a federal court's order.⁵⁰ All of this suggests that DOGE's claims regarding uncovering noncitizen voter fraud and creating an expanded SAVE system cannot be taken at face value and must be subject to significant additional transparency and verification measures.

⁴⁵ https://www.cbsnews.com/news/rfk-jr-hhs-job-cuts-doge-mistakes/

⁴⁶ https://www.cnn.com/2025/02/17/climate/trump-nnsa-nuclear-staff-reinstated/index.html

⁴⁷ https://www.foxbusiness.com/politics/musk-claims-150-vear-olds-receiving-social-security-benefits

⁴⁸ https://www.wired.com/story/elon-musk-doge-social-security-150-year-old-benefits/

⁴⁹ https://www.cbsnews.com/news/social-security-doge-100-150-year-olds-cobol-elon-musk/

⁵⁰ https://health.wusf.usf.edu/2025-04-11/how-doge-may-have-improperly-used-social-security-data-to-push-voter-fraud-narratives

Conclusion

Although noncitizen voting remains "vanishingly rare,"⁵¹ false narratives about its prevalence have gained traction, with polls showing a majority of Americans having concerns about noncitizens voting in the 2024 presidential race.⁵² To further bolster this disinformation, the administration continues to search for anything that they can claim as 'evidence' of a far reaching conspiracy of noncitizens casting ballots.

In this moment where there is a strong desire for tools to verify citizenship, we must remain vigilant in ensuring that these tools are up to the task. As those who work with 'big data' will know, systems at this scale can never be perfect and demand a level of expertise and area-specific knowledge to be leveraged successfully. Given the administration's questionable motivations, DOGE's ineptitude, and the complete lack of transparency in how this expansion of SAVE was executed, we should all have serious doubts about the quality and reliability of the recent changes they have implemented.

Furthermore, the cost of failure is high. Not only will an unreliable system add significant complications to the work of state election administrators and USCIS staff, but it will also burden an unknown number of legitimate citizens, potentially depriving them of their right to vote.

 $^{^{51}\} https://\underline{abcnews.go.com/US/election-fact-check-noncitizens-vote-instances-vanishingly-rare/story?id=115025674}$

bttps://www.npr.org/2024/10/03/nx-s1-5130284/election-concerns-voter-fraud-trump-harris-poll



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