

**Supporting Statement A:**  
**OMB Control Number: 3265-0006**  
**U.S. Election Assistance Commission**  
**2026 Election Administration and Voting Survey**

**A. Justification**

**1. Explain the circumstances that make the collection of information necessary.**

The proposed information collection is necessary for several reasons. First, the Help America Vote Act (HAVA) of 2002 (52 U.S.C. § 20901), especially §241, requires the U.S. Election Assistance Commission (EAC) to study and report on election activities, practices, policies, and procedures, including methods of voter registration, methods of conducting provisional voting, poll worker recruitment and training, and such other matters as the Commission determines are appropriate.

Second, HAVA §802 transferred to the EAC the Federal Election Commission's responsibility of biennially administering a survey on the impact of the National Voter Registration Act (NVRA) (52 U.S.C. § 20508). The information the states are required to submit to the EAC for purposes of the NVRA report is found under Title 11 of the Code of Federal Regulations (11 CFR 8.7).

Third, HAVA §703(a) amended §102 of the Uniformed and Overseas Citizens Absentee Voters Act (UOCAVA) (52 U.S.C. §20302(c)) by requiring that "not later than 90 days after the date of each regularly scheduled general election for Federal office, each state and unit of local government which administered the election shall (through the state, in the case of a unit of local government) submit a report to the Election Assistance Commission (established under the Help America Vote Act of 2002) on the combined number of absentee ballots transmitted to absent uniformed services voters and overseas voters for the election and the combined number of such ballots which were returned by such voters and cast in the election, and shall make such a report available to the general public."

Fourth, the EAC and the Federal Voting Assistance Program (FVAP), an agency of the Department of Defense, have worked together to combine their requirements to collect data about voting by UOCAVA citizens. Starting in 2014, the EAC added questions from FVAP's Post-Election Survey of Local Election Officials to the Election Administration and Voting Survey (EAVS). This consolidation of surveys reduced the paperwork burden on state and local election offices and also made FVAP a primary consumer of the EAVS. As a part of this consolidation, the EAC and FVAP worked with the chief state election official of each state and developed standards for reporting the number of absentee ballots requested and received, and other data as FVAP determines appropriate and for FVAP to store the data reported, as required under the MOVE Act (Military and Overseas Voter Empowerment), enacted as part of the National Defense Authorization Act of FY 2010 (P.L. 111-84).

The primary use of these data by FVAP is to identify areas where the electoral process can be improved by providing an accurate picture of the UOCAVA absentee voting process. These data permit FVAP to evaluate the extent to which FVAP is achieving its mission and the actions it can take to improve the process. In addition, FVAP uses these data to evaluate if legislative changes have been successful in removing barriers for absentee voting and identify any remaining obstacles to voting by those populations covered by the UOCAVA.

Finally, it is important to note that other federal agencies rely on data collected through the EAVS, including the Department of Justice, Department of Homeland Security, the Census Bureau, and the U.S. Postal Service. This is discussed in further detail below under question 2.

## **2. Indicate how, by whom, and for what purpose the information is to be used.**

These data are used by several sources. First, the EAC will use the data collected by the 2026 EAVS to meet its statutory requirements related to (1) the impact of the NVRA (52 U.S.C. § 20508) on the administration of elections for the period from the day after the November 5, 2024 Federal general elections until Election Day November 3, 2026; (2) the required HAVA information regarding the combined number of absentee ballots transmitted to absent uniformed services and overseas citizen voters for the election and the combined number of such ballots which were returned by such voters and cast in the election; and (3) information required by the Help America Vote Act (HAVA) of 2002 (52 U.S.C. § 20901), especially §241, that is used in the EAC biennial report to Congress. The EAC also uses these data for various reports and guidance for state and local election officials.

Second, FVAP is a primary user of these data; it is required to submit a report to Congress reflecting a statistical analysis of uniformed services and overseas citizen participation in each federal general election, and also uses these data for policy-specific analyses. The EAC shares all relevant EAVS data with FVAP now that the EAC collects all local election official quantitative data for FVAP.

Third, additional users of these data include other federal agencies. For example, the Voting Section of the Department of Justice's Civil Rights Division uses EAVS data to inform its monitoring and enforcement of federal voting laws, including HAVA, the NVRA, and UOCAVA. The Election Security Initiative at the Department of Homeland Security's Cybersecurity and Infrastructure Security Agency, which leads federal efforts to protect U.S. election infrastructure following its designation as critical infrastructure in January 2017, uses EAVS data to inform its analyses of election infrastructure, including election technology cybersecurity threat modeling for different types of election jurisdictions. Other examples include the Census Bureau, which has used EAVS data on turnout and voter registration to help validate data collected through the Voting and Registration Supplement to the American Community Survey, and the U.S. Postal Service, which has used EAVS data to inform trend analyses on voting by mail.

Finally, EAVS data are also used by an array of public users, including academic and

public policy researchers, in an effort to understand the conduct of American election administration.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.**

In 2016, the EAVS data collection was modified so that states had much greater flexibility in collecting and reporting data. The data were collected primarily using an Excel template, but modifications were made so that states with more sophisticated capabilities could report their data as an export from their state election management system. States who needed to collect data directly from their local jurisdictions were provided with a simple Excel-based template, and these data could be easily combined into a single state report. Some localities were allowed to report their data on a paper form, or via a telephone interview-style data collection format. The reported data were also validated using human-assisted machine learning techniques.

In 2018, the EAC created an online data collection system to supplement the Excel-based template that accommodated state-level data exports; this online system replaced the Excel template that allowed for item-by-item data entry. This online system was used by more than a dozen states, especially those that rely heavily on local election offices to provide EAVS data. The state and local election offices that used the online system reported positive feedback and indicated that it reduced the time spent filling out the survey. The online system also increased data integrity by incorporating data validation checks throughout the online survey and by reducing the amount of manipulation that state officials needed to do with local-level submissions; the Excel template had the capability of automatically porting online survey submissions into a single Excel file.

The EAC plans to use the online data collection system again in 2026 to supplement the Excel-based template and will introduce additional capabilities that will allow local election offices to edit their data prior to certification and better track their local jurisdictions' progress through the survey. It is expected that these additional functionalities will further reduce the response burden associated with the survey and will lead to higher-quality and more accurate data submissions.

**4. Describe efforts to identify duplication.**

In 2014, FVAP and the EAC combined their survey questions about UOCAVA voting to lessen the burden on states and localities associated with federal reporting of these data. By asking the questions once, in a single survey, both organizations have obtained higher-quality data and higher compliance with data reporting requirements. Under the memorandum of understanding between the two agencies, FVAP provided the EAC with the survey questions, which were added to the EAVS, and the EAC provided FVAP with all UOCAVA data after the survey had been administered.

In 2015, FVAP created a working group that reviewed all UOCAVA questions contained in the EAVS. The group identified all redundant questions and recommended changes to

other questions so that the questions could be more easily understood and data reporting improved. The 2018 survey questions related to UOCAVA voting were reduced based on this effort, and this reduction in questions continues in the 2020 survey. In 2019 and 2022, the EAC launched a similar working group to examine the voter registration questions in the EAVS, including efforts to streamline questions where redundancy may exist. Changes recommended by this group were implemented in the 2024 EAVS. In 2025, the EAC launched six working groups to examine questions in Sections B-F of the EAVS and on data collection practices. Some of the changes recommended by this group have been in the 2026 EAVS.

To further identify and mitigate against duplication of effort, EAC staff maintain regular communication with federal agencies known to conduct data collections on similar topics, such as the Census Bureau and FVAP. For example, when modifying questions regarding UOCAVA voters for the 2020 Policy Survey, a component of the EAVS data collection formerly called the Statutory Overview, EAC staff discussed potential revisions with FVAP and reviewed existing FVAP data collections to ensure that duplication was avoided. Similarly, when considering a potential new question for the 2020 EAVS on election jurisdiction employment, the EAC engaged officials at the Census Bureau who administer the Annual Employment Survey and Census of the Governments to inform question design and make sure there would be no duplicated effort.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

This information collection does not have a significant impact on small businesses or other small entities. The chief election officials for the states, the District of Columbia, and the U.S. territories may have to request information from their local election jurisdictions, but much of this information is already routinely collected from the local election officials to certify election results and report voter turnout.

The EAC has made efforts to limit the information requested and burden on all participants. The information sought is limited to that information necessary to meet the requirements listed in response to Question 1.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

If the EAC does not collect this information it will be unable to comply with its statutory requirements under HAVA (52 U.S.C. § 20901), NVRA (52 U.S.C. § 20508), and UOCAVA (52 U.S.C. §20302(c)). This collection of information must be carried out every two years after each Federal general election as stipulated by NVRA and UOCAVA. In addition, FVAP will be unable to meet its congressional reporting requirements related to UOCAVA voting if the EAC does not collect this information.

Because the core questions in the EAVS will not change for 2026 and have not changed

dramatically since 2006, state and local election offices are well-positioned to answer the questions contained in the survey. Many election offices already have developed data collection methods for the EAVS data or developed system queries to extract data from election management systems, which also reduces the burden of the EAVS moving forward.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

There are no special circumstances applicable to this information collection.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5CFR 320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside of EAC.**

The EAC published a Federal Register Notice soliciting comments on the information collection on January 12, 2026, Vol. 91, No. 7, pgs. 1179. A copy of the notice as published is provided as Attachment A. In addition to publication in the Federal Register, the EAC sought to maximize the public comments received by advertising the public comment period on its social media channels and by encouraging election officials, scholars, and other stakeholders in the elections community to review the documents and submit comments. Prior to submission to the Federal Register, the EAC consulted with the EAVS committee on its Standards Board (a federal advisory committee to the EAC) and members of a working group to solicit their input on potential modifications to the data collection.

EAC received 53 comments that were submitted by 38 individuals in at least 14 states. Comments were made regarding both the EAVS and the Policy Survey.

Commenters generally support the surveys but push for sharper focus on data quality, clearer definitions, and reduced reporting burden. A large share of comments targeted voter registration integrity and list maintenance. They urged new questions on registrations accepted, denied, or removed based on driver's license and Social Security verification, on non-citizen registrations and removals, and on applications lacking both an ID number and SSN, with details on how identity is verified. Several called for EAVS to capture inactive voters, duplicates, and list maintenance activity more transparently, including use of federal and interstate data sources under NVRA section 8.

Another major theme was UOCAVA and mail voting. Commenters expressed concern about growth and vulnerability of overseas civilian voting and recommended stricter proof of citizenship and residency requirements for overseas registrants, plus clearer UOCAVA subcategories in EAVS. For mail and absentee voting, they asked for more detailed fields on undeliverable ballots, rejection reasons, cure processes, and timelines, along with tracking voters who were mailed a ballot but then voted in person. Some

focused on USPS's 2025 postmark rule change and urged EAVS to document how states use postmarks and ballot deadlines.

Technology and cybersecurity comments called for more granular equipment reporting—separating ballot marking devices from combined BMD/tabulators, distinguishing encoded from non-encoded BMD output, and recording system and e-poll book versions. They also recommended carefully crafted cybersecurity questions that inform policymakers without exposing vulnerabilities. Data design comments urge modernizing EAVS: moving away from static PDFs toward prepopulated, API friendly systems with strong validation, better codebooks, fewer “Other” categories, and standardized machine-readable outputs with stable jurisdiction identifiers.

Several submissions criticized timing and survey burden, arguing that EAVS and the Policy Survey, as currently designed, may underestimate the labor required, duplicate other federal data collections, and pull staff from election operations in a critical cycle. They ask the EAC to justify each question's utility, consider shifting policy questions to the post-election period, and more fully document burden and alternatives under the Paperwork Reduction Act and Regulatory Flexibility Act. Overall, the comments seek a 2026 EAVS that better captures registration integrity, mail voting practices, technology and cybersecurity posture, and audit transparency, while being more standardized, usable, and realistically scoped for election offices.

The EAC's responses to the suggestions for the EAVS and Policy Survey are below:

Many of the comments were ultimately not acted upon. In most cases, this was because the proposals fell outside the EAVS mandate, were considered too burdensome to implement, or were already addressed through existing questions in the EAVS and the Policy Survey. At the same time, several comments pointed to areas where further research is needed before changes can be made. In particular, proposals involving new questions—such as those addressing mail ballot processes, electronic ballot transmission, or polling-place resource metrics—will require additional testing with election officials to ensure they are practical and effective.

Even so, a number of recommendations were adopted or partially incorporated. For example, a new question on audit-results availability (Q48b) will be added to the Policy Survey, and language around curbside voting has been clarified, along with the introduction of a new sub-question (Q34c) on how such voting is facilitated. There is also consideration being given to improving the structure of published data for 2026 through the use of more descriptive variable names and possible section-based organization.

Several revisions were made in direct response to public comments to improve clarity and usability. A bullet defining “Transaction” before question A3 was removed to avoid confusion among respondents, while questions A11e and B27 were retained. Instructions for C1e were updated to note that responses are now included in C1d. In addition, question C9f was reverted to its 2024 wording—“Ballot was returned in an unofficial envelope”—and related items (C9g through C9l) were retained, covering mail ballot rejection reasons such as missing ballots, improper envelopes, and missing postmarks or

addresses.

Further updates include the addition of new questions and response options across several sections. A new item, E2j, captures cases where a poll book indicates a voter was already issued a ballot, and E3h was reverted to its 2024 wording regarding missing signatures, while E3i was retained. Q6 on automatic voter registration was revised, and Q8 now includes an option allowing voters to cancel their registration record. Q16 was expanded with new data sources—such as commercial data, interstate agreements, and federal verification systems—and revised to clarify existing categories.

Additional refinements address accessibility and election administration practices. Q33c now includes procedures for setting up and verifying polling place accessibility, while Q34 was revised to refer more broadly to “eligible voters.” Elsewhere, Q45a now includes an option noting when a poll book shows a ballot has already been issued.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

The EAC does not provide any payment or gift to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

There is no assurance of confidentiality.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

There are no questions of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

The information collection has two parts: The Election Administration and Voting Survey (EAVS), and the Policy Survey. The estimated response burden is based on data collected in 2025 during the 2024 EAVS data collection process. Our survey templates were programmed with timers to track how long it took each state to complete the template they used for the EAVS and the Policy Survey. The mean response was 80 hours for the EAVS. It should be noted that this estimated response burden is slightly lower than 2024. This reduction is likely due to multiple factors, including EAC efforts to streamline questions and improve data collection mechanisms over time, as well as state efforts to modify their systems and processes to accommodate this biennial collection, which has remained largely unchanged since the 2008 iteration of the survey.

Under the online method of completing the Policy Survey, where States select pre-determined response options, we estimate that the new burden for completing the Policy Survey is, on average, 3 hours. This represents a one hour increase from the 2024 EAVS.

The table below summarizes the burden estimates for the EAVS and the Policy Survey. Because this data collection occurs every two years, we have calculated and provided the annualized burden.

<b>Collection Component</b>	<b>Number of Respondents</b>	<b>Respondent Burden</b>	<b>Total Burden</b>	<b>Annualized Burden</b>
EAVS	56	80	4,480	2,240
Policy Survey	56	3	168	84
<b>Total</b>		<b>83</b>	<b>4,648</b>	<b>2,324</b>

Note: Decimals are rounded to the nearest whole number.

The estimated cost of the annualized cost of this burden is: \$58,564.80, which is calculated by taking the annualized burden (2,324 hours) and multiplying by an hourly rate of \$25.20 (GS-8/Step 5 hourly basic rate).

**13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.**

There are no capital or start-up costs associated with this information collection.

**14. Provide estimates of annualized cost to the Federal government.**

The estimated annual cost to the Federal Government is \$372,050.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB Form 83-I.**

The EAC requests a decreased number of burden hours in Item 13 of OMB Form 83-I. As noted in the response to item 12 of this justification, the decreased burden is due to multiple factors, including respondents' increased familiarity with the EAVS survey, a more accurate estimate of the states' burden after several iterations of the data collections documented in prior years, streamlined questions and instructions, improvements to the data collection mechanisms, and the transition from the Statutory Overview survey to the Policy Survey.

The decreased burden hours entail decreased reporting on the part of the states and their respective jurisdictions. We document the cost of that burden in Item 14 of OMB Form 83-I.

**16. For collections whose results will be published, outline the plans for tabulation and publication.**

The EAC is required by the NVRA (52 U.S.C. § 20508) no later than June 30th of each odd-numbered year to submit to Congress a report assessing the impact of the Act on the

administration of elections for Federal office during the preceding two-year period and outlining major findings about the administration of Federal general elections. This report for the 2026 Federal general election will be delivered to Congress and publicly released on the EAC's website by June 30, 2027.

The EAC will also make available to the public the information collected on the combined number of absentee ballots transmitted to uniformed and non-uniformed citizen voters and the combined number of such ballots which were returned by such voters and cast in the election as required by UOCAVA §102(c). The EAC will release its UOCAVA findings concurrently with the release of the NVRA report. All of the data collected through this project will be made publicly available via EAC's website.

In addition to the report issued by the EAC, FVAP will also make the analysis of its data public from questions contained in Section B of the EAVS once its biennial Report to Congress is submitted in September 2027.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

Not applicable to this collection.

**18. Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.**

The EAC does not request an exception to the certification of this information collection.