



PERSONNEL AND
READINESS

OFFICE OF THE UNDER SECRETARY OF WAR
4000 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-4000

AUG 13 2026

Mr. Dominic Mancini
Deputy Administrator, Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Dear Mr. Mancini:

The Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA) establishes a comprehensive Federal scheme for absentee voter registration and voting by Uniformed Service members, their families, and overseas U.S. citizens.¹ Pursuant to UOCAVA, the Secretary of War has been tasked with prescribing the official post card form containing an absentee voter registration application and an absentee ballot application for use by the States.²

Under UOCAVA, individuals are permitted to simultaneously register to vote and apply for an absentee ballot using the Federal Post Card Application (FPCA) (Standard Form 76). If the FPCA is requested but not received in time to vote, individuals may submit their ballot selections using the Federal Write-In Absentee Ballot (FWAB) (Standard Form 186).

It has recently come to our attention that the current format of these forms may confuse voters about the information they are required to provide under Federal law and their eligibility to use these forms to register and vote. The next Federal election is fewer than 90 days away, so there is insufficient time to modify the FPCA and FWAB via the standard Paperwork Reduction Act (PRA) process. As further explained below, this matter is essential to the mission of the Department of War (DoW) and public harm is reasonably likely to result if normal clearance procedures and time periods are followed. Therefore, we are seeking emergency processing pursuant to 5 CFR § 1320.13 for the following reasons.

- Both Standard Form 76 and Standard Form 186 revisions are needed immediately.
- The mission of the DoW's Federal Voting Assistance Program (FVAP) is to ensure Service members, their eligible family members, and overseas citizens are aware of their right to vote and have the tools and resources to successfully do so. Having clear and legally compliant forms to facilitate voting by eligible citizens is mission critical.
- Because the next Federal election is fewer than 90 days away, DoW cannot reasonably comply with the standard clearance procedures required by the PRA.

¹ 52 U.S.C. § 20301.

² See 52 U.S.C. § 20301(a); EO 12642; 52 U.S.C. § 20301(b)(2).

- No new or additional collection of information is proposed through this revision.
- Delay could impact voters in the upcoming Federal election.
- UOCAVA requires States to transmit validly requested absentee ballots to overseas and military voters “not later than 45 days in advance of the election.”³ The time to apply for ballots is ongoing.
- These amendments are necessary to eliminate voter confusion and to ensure that the FPCA and FWAB conform to Federal law.

The changes in both the forms would include the following language:

☐ I have a valid state issued Driver’s License (DL) or state ID (SID) -
State: _____ Number: _____

☐ I do not have a valid state DL or SID. The last 4 digits of my Social Security Number (SSN) are: _____

☐ I do not have a state DL or SID; I have not been issued an SSN. I have reviewed my state specific instructions and provide the following document or government-issued identification such as a US Passport, Military Identification Card, etc.*:
Type: _____ Number: _____

*If you select this option, you may be contacted by your Local Election Department for additional information after your application is received.

These revisions correct defects in the current form, and the revised language is consistent with registration requirements in the Help America Vote Act (HAVA) of 2002. The first ID field in the current form asks for the individual’s SSN, which may cause applicants to provide an SSN unnecessarily, under HAVA’s requirements, when they have a valid state driver’s license or state identification card. The revisions clarify the Federal requirements and ensure that applicants provide the required information, while also supporting state specific instructions for additional identification requirements.

52 U.S.C. §21083(a)(5)(A)(i) states:

[N]otwithstanding any other provision of law, an application for voter registration for an election for Federal office may not be accepted or processed by a State unless the application includes-
(i)(I) in the case of an applicant who has been issued a current and valid driver's license, the applicant's driver's license number; or
(II) in the case of any other applicant (other than an applicant to whom clause (i) applies), the last 4 digits of the applicant's social security number.
(ii) Special rule for applicants without driver's license or social security number⁴

³ 52 U.S.C. § 20302(a)(8).

⁴ 52 U.S.C. § 21083.

The following line would also be eliminated from the forms to avoid applicant confusion:

☐ "I am a US citizen living outside the country, I have never lived in the United States."

UOCAVA defines an eligible overseas voter as a person who would be qualified to vote in the last place "the person was domiciled before leaving the United States."⁵ Individuals who have never resided in the United States are not within the class of voters specifically defined by UOCAVA and therefore may not be able to use the FPCA or the FWAB. Voters may be confused by the language on the form, and individuals outside of UOCAVA's scope may believe they are eligible to use the forms to register and vote.

The FPCA and FWAB have been amended several times, most recently in 2019 and 2023. It is urgent that we revise them at this time to ensure these documents comply fully with Federal law. Clarification of already existing FPCA and FWAB fields will ensure that State and local election officials are aware of Federal registration requirements and will facilitate compliance with Federal law.

DoW has consulted on this matter with the Department of Homeland Security. No additional steps are necessary to consult with interested parties to minimize the burden, as no additional burden is anticipated in the vast majority of cases and only a de minimis burden is imposed in the event an individual without an SSN, driver's license, or State identification must provide an alternative identification. These are minor modifications to existing forms FPCA (Standard Form 76) and FWAB (Standard Form 186). No new collection of information is proposed through this revision. To meet UOCAVA ballot delivery deadlines, and to provide sufficient advance guidance to the States and to voters, DoW is requesting standard pre-clearance public comment periods are requested to be bypassed to ensure timely implementation.

Standard Form 76 OMB 0704-0503 last revised 1-2023⁶
Standard Form 186 OMB 0704-0502 last revised 1-2023⁷

Sincerely,



Sean O'Keefe

Deputy Under Secretary of War for Personnel
and Readiness

⁵ 52 U.S.C. § 20310.

⁶ <https://www.fvap.gov/uploads/FVAP/Forms/fpca.pdf>.

⁷ <https://www.fvap.gov/uploads/FVAP/Forms/fwab.pdf>.