



**TESTIMONY OF
THE DEPARTMENT OF THE ATTORNEY GENERAL
KA 'OIHANA O KA LOIO KUHINA
THIRTY-THIRD LEGISLATURE, 2026**

ON THE FOLLOWING MEASURE:

H.B. NO. 322, H.D. 2, RELATING TO VOTER REGISTRATION.

BEFORE THE:

SENATE COMMITTEE ON GOVERNMENT OPERATIONS

DATE: Tuesday, March 17, 2026

TIME: 3:05 p.m.

LOCATION: State Capitol, Room 225

TESTIFIER(S): Anne E. Lopez, Attorney General, or
Jung Min (Charles) Lee, Deputy Attorney General

Chair McKelvey and Members of the Committee:

The Department of the Attorney General provides the following comments on this bill.

The purpose of this bill is to improve Hawaii's voter participation rate by strengthening the State's automatic voter registration program. The bill updates the State's automatic voter registration framework for Department of Transportation (DOT) transactions and expands its application to additional transaction types, including instruction permits, provisional licenses, duplicate credentials, and renewals. Currently, voter registration is already integrated into driver's license and state identification card transactions, and applicants are provided the opportunity to register or decline as part of the application process. The House Draft 2 makes no substantive changes from the House Draft 1. The House Committee on Finance amended the measure solely for purposes of clarity, consistency, and style. The Department previously submitted comments on the House Draft 1 and the concerns identified in the Department's prior testimony remain applicable to the House Draft 2.

Under this bill, the submission of an application for a new, renewed, or duplicated instruction permit, provisional license, driver's license, or state identification card would be deemed to authorize the examiner of drivers to collect and electronically transmit the applicant's information to election officials for voter registration or preregistration; provided the applicant is of sufficient age, provides a Hawaii residence address, and

has "presented documentation demonstrating United States citizenship." Applicants may decline registration or preregistration through the return form process described in the bill following the mailing of notice by the county clerk. Additionally, the bill allows the Office of Elections to designate other state agencies to implement similar automatic registration procedures if they already collect proof of citizenship or externally verify citizenship.

The Department is concerned that conditioning DOT transmission on documentary proof of citizenship may create federal preemption risk under the National Voter Registration Act (NVRA) for registration used in elections for federal office. The NVRA's motor-voter provision is built around an attestation-based model: it requires an eligibility attestation signed under penalty of perjury, and it limits the Department of Motor Vehicles (DMV) registration portion to "only the minimum amount of information necessary" for election officials to assess eligibility and administer registration. 52 U.S.C. section 20504(c)(2)(B), (C).

That "minimum information" and attestation framework is problematic for this bill because the bill conditions transmission on additional documentary proof and record-based verification of citizenship status. This requirement could be challenged as exceeding what the NVRA permits in the motor-voter process for federal elections, particularly if the practical effect is to deny the automatic transmission pathway absent documentation. To reduce this risk, the Department recommends removing the bill's documentary-proof condition for DOT transmission and instead relying on the existing attestation-based process, coupled with a "negative screen" that prevents transmission only where the applicant presents documentation demonstrating a lack of United States citizenship.

The Department also notes an internal inconsistency that increases legal and implementation risk. Although the bill conditions DOT transmission on documentary proof and verification of citizenship (amendments to section 11-15.7(a) and (c), Hawaii Revised Statutes (HRS) at page 4, lines 12-15, and page 6, lines 1-5), it also states in the amendments to section 11-15.7(l)(2), HRS, that "[n]othing in this section shall be construed to . . . [r]equire documentary proof of citizenship for voter registration or

preregistration" (page 11, lines 14-18). To resolve this inconsistency, the Department recommends conforming the operative provisions to this limiting language by removing the documentary-proof condition from the DOT transmission authority, so the statute does not disclaim a proof requirement while effectively imposing one through the DOT automatic registration pathway.

Thank you for the opportunity to provide comments.



Hawai'i State Lesbian, Gay, Bisexual, Transgender, Queer Plus Commission



Advocating for the Hawai'i LGBTQIA+ Community

Mailing Address: LGBTQ+ Commission, c/o The Department of Human Services,
P.O. Box 339, Honolulu, Hawai'i 96809-0339

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March 15, 2026

Senate's Committee on Government Operations
Hawai'i State Capitol
415 South Beretania Street
Honolulu, HI 96813

Hearing: Tuesday, March 17, 2026 at 3:05 PM

RE: STRONG SUPPRT for House Bill 322 HD 2

Aloha Chair McKelvey, Vice-Chair Gabbard and fellow committee members,

I am writing in strong support of House Bill 322 on behalf of the Hawai'i State Lesbian, Gay, Bisexual, Transgender, Queer Plus (LGBTQ+) Commission, which was established by the 2022 Hawai'i State Legislature to

“improve the State's interface with members of the lesbian, gay, bisexual, transgender, queer, plus community; identify the short- and long-range needs of its members; and ensure that there is an effective means of researching, planning, and advocating for the equity of this population in all aspects of state government.”

The Hawai'i State LGBTQ+ Commission respectfully submits strong support for House Bill 322, which authorizes state agencies to implement automatic voter registration (AVR) when designated by the Hawai'i Office of Elections and requires eligible applicants for instruction permits, provisional licenses, driver's licenses, and state identification cards to be automatically registered or preregistered to vote unless they opt out.

Free and fair access to the ballot is foundational to democracy. For LGBTQIA+ citizens, particularly transgender individuals, young people, Native Hawaiian māhū, people with disabilities, low-income residents, and those experiencing housing instability — bureaucratic barriers can function as disenfranchisement. Automatic voter registration is a commonsense modernization that reduces paperwork, increases accuracy of voter rolls, and ensures that eligible residents are not excluded from civic participation simply because they did not navigate a separate registration process.

LGBTQIA+ communities have historically faced discrimination that discouraged or obstructed participation in public life. Policies that proactively include people in the democratic process help counteract that legacy. AVR is especially impactful for young voters, including those preregistering when obtaining an instruction permit, creating a clear and seamless pathway into civic engagement. Given that LGBTQIA+ youth are disproportionately represented among those facing family rejection, housing instability, and economic hardship, reducing administrative hurdles to registration is both equitable and necessary.

Proudly established pursuant to Hawai'i Revised Statutes Chapter 369, as enacted through Act 41, Session Laws of Hawai'i 2022

HI State LGBTQ+ Commission Testimony in Support of HB 322

Importantly, House Bill 322 preserves individual choice through a clear opt-out provision. This balances accessibility with personal autonomy while strengthening the integrity and completeness of Hawai'i's voter rolls.

At a time when voting access is being restricted in many parts of the country, Hawai'i has the opportunity to lead by example — affirming that democracy works best when participation is broad, inclusive, and accessible.

If you or any member of your staff has any questions regarding my testimony you can reach me at hawaiistatelgbtqpluscommission@gmail.com.

Mahalo nui loa for your time and consideration,

Sandy Harjo Livingston (he/him/they/them)
Chair
[Hawai'i State LGBTQ+ Commission](#)

[Inclusive LGBTQIA+ Glossary](#)

The [Hawai'i State LGBTQ+ Commission](#) has this webpage and that is dedicated to understanding and being able to use the correct terms when talking about the rainbow community from māhū to LGBTQIA+ to QTPI+ to MVPFAFF+ and beyond. The list found on this page is not an exhaustive list and will be updated as appropriate.



**STATE OF HAWAII
OFFICE OF ELECTIONS**

802 LEHUA AVENUE
PEARL CITY, HAWAII 96782
elections.hawaii.gov

SCOTT T. NAGO
CHIEF ELECTION OFFICER

TESTIMONY OF THE
CHIEF ELECTION OFFICER, OFFICE OF ELECTIONS
TO THE SENATE COMMITTEE ON GOVERNMENT OPERATIONS
ON HOUSE BILL NO. 322, HD 2
RELATING TO VOTER REGISTRATION

March 17, 2026

Chair McKelvey and members of the Senate Committee on Government Operations, thank you for the opportunity to provide comments on House Bill No. 322, HD 2. We appreciate the committee's efforts to expand access to voting and strengthen civic engagement.

This bill authorizes state agencies to implement automatic voter registration if designated by the Office of Election; and requires eligible applicants for instruction permits, provisional licenses, driver's licenses, and identification cards to be automatically registered or preregistered to vote unless the applicant opts out.

Our office supports the intent of the bill as it increases access to voter registration. We would defer to other government agencies and the county clerks regarding the further impacts on operations as well as the implementation.

Thank you for the opportunity to provide comments on House Bill No. 322, HD 2.

DEPARTMENT OF CUSTOMER SERVICES
KA 'OIHANA LAWELAWE KUPA
CITY AND COUNTY OF HONOLULU

ADMINISTRATION

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March 16, 2026

The Honorable Angus L.K. McKelvey, Chair
The Honorable Mike Gabbard, Vice Chair
and Members of the Senate Committee on Government Operations
State Capitol, Conference Room 225
415 South Beretania Street
Honolulu, Hawai'i 96813

Dear Chair McKelvey, Vice Chair Gabbard, and Members of the Senate
Committee on Government Operations:

SUBJECT: H.B. No. 322, H.D. 2 - Relating To Voter Registration
HEARING: Tuesday, March 17, 2026, 3:05 p.m.

The City and County of Honolulu, Department of Customer Services (CSD), respectfully offers **comments** to H.B. No. 322, H.D. 2, which requires eligible applicants for instruction permits, provisional licenses, driver's licenses, and identification cards to be automatically registered or preregistered to vote unless the applicant opts out. Pursuant to Section 6-402 of the Revised Charter of the City and County of Honolulu, CSD Division of Motor Vehicles (DMV) administers, among other things, the motor vehicle driver licensing and state identification card programs for the island of O'ahu. While CSD appreciates the intent of the proposed legislation, we have concerns regarding its application and its legal implications.

CSD supports efforts to increase voter participation, but has concerns regarding the operational and financial impacts the proposed legislation will have on the City and County of Honolulu.

The proposed legislation would require modifications to CSD DMV's information technology system, CSD DMV forms, and CSD DMV internal policies and procedures. Specifically, amendments to sections 11-15.5, 11-15.7, 286-107, 286-110, 286-111, 286-111.5, 286-117, 286-303, 286-303.5, 286-311, and 346-10, Hawai'i Revised

Statutes (HRS), would introduce new responsibilities for CSD DMV, including but not limited to:

- Integrating automatic voter registration mechanisms into licensing and identification systems;
- Implementing changes to license renewals (section 286-107, HRS); instruction permits (section 286-110, HRS); applications for licenses, provisional licenses, instruction permits, limited purpose driver's licenses, limited purpose provisional driver's licenses, and limited purpose instruction permits (section 286-111, HRS); duplicate permits, provisional licenses, and licenses (section 286-117, HRS); and identification cards (section 286-303, HRS);
- Ensuring compliance with federal and state data privacy and security requirements; and
- Conducting staff training and public outreach to support implementation and administration of the revised voter registration process.

These additional responsibilities would be true statewide, as each county is responsible for administering licensing and identification programs. Additionally, the proposed legislation may have unintended consequences for Hawai'i's current licensing processes and require further clarification on implementation timelines and funding support from the state.

Given these significant operational considerations, we respectfully request the Legislature provide clear guidance on funding, resources and the necessary time available for implementation. CSD DMV urges the Legislature to consider the impact on county operations and, should this matter move forward, requests a phased approach to implementation that will allow for a reasonable and adequate amount of time for the counties to research and assess implementation requirements, staffing, funding requirements, information technology and other resource impacts, necessary updated administrative procedures, staff training, and good public outreach.

With these considerations in mind, CSD appreciates the opportunity to **comment** on H.B. No. 322, H.D. 2.

Sincerely,

for Kimberly M. Hashiro
Director



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TESTIMONY
TO THE HOUSE COMMITTEE ON GOVERNMENT OPERATIONS
ON HOUSE BILL NO. 322 HD2
RELATING TO VOTING

March 17, 2026

Chair McKelvey, Vice Chair Gabbard and Members of the Committee:

The Office of the City Clerk generally supports the intent of HB322 HD2. Under Hawai'i's vote-by-mail election system, voter registration has a direct and tangible relationship to voting because a ballot is mailed to every properly registered voter. Expanding voter registration opportunities directly supports voter access and participation. The measure is also consistent with the framework of the National Voter Registration Act of 1993 (NVRA), which requires certain agency-based voter registration while authorizing states to designate additional agencies to expand access to registration services. See 52 U.S.C. § 20506(a)(3).

The City's primary concern is with the proposed implementation structure. Federal law already establishes centralized statewide voter registration database administration through the Help America Vote Act of 2002, which requires a single, uniform, official statewide voter registration list. In Hawai'i, this function is carried out through the State Office of Elections that administers the Statewide Voter Registration System's information technology and data transfer functionality.

Consistent with this framework, the Office of Elections should play a central role in coordinating participating agencies, managing data transmission standards and agreements, and receiving and initially processing agency data prior to import into the statewide voter registration system. This centralized role is particularly important because this initiative may create multiple potential points of data intake across participating state agencies, making statewide coordination essential to ensure uniformity, data integrity, and consistent implementation practices.

As currently drafted, the bill appears to create operational impacts for counties while providing limited authority for counties to manage agency participation or compliance. Counties have observed similar structural considerations in the existing driver licensing voter registration program, which also requires the electronic transfer of data. Based on the counties' experience in this context, data transfer functionality remains a challenge that has required significant and ongoing State-level interagency

coordination. Centralized statewide coordination may help support consistent implementation and avoid duplicating similar implementation challenges as additional agencies are designated to participate in data transfer activities.

Since this appears to be creating a new state program, a more effective structure would have the State Office of Elections coordinate directly with participating agencies, manage data transmission arrangements, and conduct statewide quality assurance functions, including the issuance of opt-out mailers. Counties would continue their existing role by processing the returned opt-out notices and any resulting voter record corrections, maintaining statewide uniformity and alignment with State law.

Finally, the bill does not provide funding for implementation. As currently drafted, program costs, including printing and mailing opt-out notices, appear likely to result in implementation costs without an identified appropriation. A state-administered structure would provide the Legislature with a clearer mechanism to directly support implementation costs and ensure consistent execution.

As a county agency, we are unable to provide an estimate of the program costs for “opt out mailers” since we are not certain how many state agencies might be designated and the number of transactions that each may perform in any given year.

For these reasons, the Office of the City Clerk supports the policy intent of HB322 HD2 and respectfully recommends clarifying centralized program administration through the State Office of Elections while preserving counties’ operational role in voter record maintenance and voter correspondence processing.

Thank you for the opportunity to provide testimony.





Committee on Government Operations
Senator Angus L. McElvey, Chair and Senator Mike Gabbard, Vice Chair
Tuesday, March 17, 2026, 3:05 p.m.
Conference Room 225 & Videoconference

HB 322, HD2 – RELATING TO VOTER REGISTRATION

TESTIMONY

Janet Mason, Legislative Committee, League of Women Voters of Hawaii

Chair McElvey, Vice Chair Gabbard, and Committee Members:

The League of Women Voters of Hawaii comments on HB 322 HD2 intended to strengthen the State’s automatic voter registration program. We have a substantial number of unregistered, potentially eligible voters, and the percentage of those eligible to vote has apparently declined in recent years.¹ Those who support democracy, including the League of Women Voters of Hawaii, want to improve this situation.

The HD2 version of the bill is better than earlier versions. It now clearly suggests only one major change to Hawaii’s automatic voter registration program which is currently administered through the Department of Transportation. Applicants for instruction permits, provisional licenses, driver’s licenses, and identification cards would be automatically registered or preregistered to vote, ***unless the applicants opt out.***

We believe that the “opt in” approach is preferable because it places the responsibility for registration on the individual voters. The “opt out” approach proposed in this bill may strike some as coercive. Our view is that applicants should willingly attest that they wish to register to vote.

Regardless of the outcome of this measure, more voter education about how to register to vote is needed. Elections officials will play a vital role in keeping the public informed about any changes in registration procedures such as those contemplated in this bill.

We support the current practice of relying on County Clerks (not other State agencies) to determine eligibility for voter registration. Once applicants provide information through the Department of Transportation, County Clerks—not the Office of Elections or other

¹ In the 2022 General Election, the voting-eligible population was estimated at 1,046,736 people, yet our total turnout was only 423,443, some 40.5%. Source: <https://elections.hawaii.gov/election-results/https://election.lab.ufl.edu>

State agencies such as the Department of Transportation—are responsible for determining voter eligibility. Section 3 (4)(c) of the bill appears to contain language that would allow the examiner of drivers, rather than County Clerks, to determine proof of citizenship. In the HD1 version of this measure, the Department of the Attorney General also commented on the appropriate and limited data-collection/data transmission role for the Department of Motor Vehicles, leaving eligibility determinations to elections officials.

If the legislature chooses to pass this measure (or SB 2239, which is similar), requirements for successful implementation need further attention. Mailing costs for County Clerk notifications would be higher to distribute an “opt-out” verification card post registration. Modifications to information technology systems and internal policies and procedures would be needed, as previously noted by the Honolulu Department of Community Services. Other counties would likely face similar issues. We recommend that estimates of these costs be collected, and an appropriation be included in this bill.

We acknowledge that Hawaii’s current automatic Motor-Voter–style opt-in process requiring affirmative consent and signature differs from the opt-out automatic voter registration systems that are used in more than 20 states and the District of Columbia. However, given the current federal efforts to influence voter registration, we hope the Legislature will adopt an effective date and adequate financing to ensure effective implementation.

Thank you for the opportunity to submit testimony.



March 15, 2026

Senate's Committee on Government Operations
Hawai'i State Capitol
415 South Beretania Street
Honolulu, HI 96813

Hearing: Tuesday, March 17, 2026 at 3:05 PM

RE: **STRONG SUPPORT for House Bill 322 HD 2**

Aloha Chair McKelvey, Vice-Chair Gabbard and fellow committee members,

Pride at Work – Hawai'i is an official chapter of [Pride at Work](#) which is a national nonprofit organization that represents LGBTQIA+ union members and their allies. We are an officially recognized constituency group of the AFL-CIO that organizes mutual support between the organized Labor Movement and the LGBTQIA+ Community to further social and economic justice. We write in **strong support of House Bill 322**.

House Bill 322 authorizes state agencies to implement automatic voter registration (AVR), when designated by the Hawai'i Office of Elections, and ensures that eligible residents applying for instruction permits, provisional licenses, driver's licenses, or state identification cards are automatically registered or preregistered to vote unless they choose to opt out.

For working people, democracy must be accessible. Many union members juggle multiple jobs, caregiving responsibilities, and long shifts. Requiring a separate voter registration process creates unnecessary barriers that disproportionately impact low-wage workers, young workers, rural residents, and those without stable housing. Automatic voter registration is a simple, efficient reform that meets people where they already are — at the point of interaction with government services.

For māhū, LGBTQIA+ and QTPI+ workers, access to the ballot is not theoretical. It is directly tied to workplace protections, nondiscrimination laws, collective bargaining rights, healthcare access, and policies that protect transgender workers from discrimination. When barriers to voting exist, it is marginalized communities — including queer and trans workers — who are most likely to be left out of the democratic process.

AVR strengthens the accuracy of voter rolls, reduces administrative costs over time, and increases participation without mandating participation. The opt-out provision

Pride at Work – Hawai'i's Testimony in STRONG SUPPORT of Re: HB 322 HD 2

preserves individual choice while shifting the system toward inclusion rather than exclusion.

At a time when anti-worker and anti-LGBTQIA+ legislation is advancing in many parts of the country, Hawai'i can continue to lead by expanding access to democracy. Strong unions depend on strong civic engagement, and strong civic engagement depends on removing unnecessary obstacles to voter participation.

Pride at Work – Hawai'i respectfully urges the Committee to pass House Bill 322 HD 2.

In Solidarity,

Michael Golojuch, Jr. (he/him)

President

[Pride at Work – Hawai'i](#)



MARCH 17, 2026

HOUSE BILL 322 HD2

CURRENT REFERRAL: GVO

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Kris Coffield,
President

David Negaard,
Director

Mireille Ellsworth,
Director

Justin Salisbury,
Director

Eileen Roco,
Director

Beatrice DeRego,
Director

Corey Rosenlee,
Director

Amy Zhao,
*Policy and Partnerships
Strategist*

POSITION: SUPPORT

Imua Alliance supports HB 322 HD2, relating to voter registration, which authorizes state agencies to implement automatic voter registration if designated by the Office of Elections; and requires eligible applicants for instruction permits, provisional licenses, driver's licenses, and identification cards to be automatically registered or preregistered to vote unless the applicant opts out.

Imua Alliance is a Hawai'i-based organization dedicated to ending all forms of exploitation, which necessitates strengthening access to democracy. Government should work for the public interest, not special interests.

Our democracy belongs to we, the people. At a time when our nation is experiencing extreme political turmoil and basic civil liberties—including the right to vote—are under assault, we must take steps in Hawai'i to safeguard democratic participation. Every eligible person should be able to register to vote in a convenient and secure way that is beneficial to new voters and administrators alike. Key voter registration improvements can elevate electoral confidence, save public funds, and preserve the voice of our community in determining the course of our society's future.

In 2021, Hawai'i established automatic voter registration to increase the state's historically low voter participation rates. Yet, the automatic voter registration system established by the legislature was an opt-in system that places responsibility for registration on individual voters, thereby failing to fully include the total potential population of new voters. This undermines the full impact of our automatic voter registration program, which is desperately needed to curb low voting rates. **In the 2024 primary election, for example, our state experienced its lowest turnout in 65 years, with only 32.1 percent of registered voters filling out a ballot.**

To improve those statistics, we must enact measures that strengthen the right to vote. This measure will make registration more efficient by empowering applications at public-facing state agencies—such as for Med-Quest licenses, permits, change of address forms, recertifications, or services offered by the state—to serve as “dual-purpose” voter registration applications, with the applicant being given the option to affirmatively declines (rather than being forced to affirmatively opt-in) to voter registration or preregistration.

This will change our automatic voter registration system from an “opt in” to an “opt out” model, which will guarantee that the intent of the program—to maximize democratic participation by making voter registration as “automatic” as possible—is fully effectuated, especially in light of other forward-thinking electoral programs that the state has undertaken, like mail-in voting.

We are especially hopeful that this proposal will strengthen democratic participation by enabling survivors of gender violence and sexual exploitation to engage more fully and safely in civic life. **Survivors frequently face barriers to participation—including trauma, fear of retaliation, economic instability, and distrust of institutions—that can silence their voices in public processes.** By removing structural obstacles to voter registration, this bill helps create a more inclusive democratic space. In this way, the bill enhances Hawai‘i’s democratic fabric by empowering historically underrepresented voices to participate with dignity and confidence in our civic processes.

Women, racial minorities, and members of the working class fought for years to obtain the right to vote. Sadly, we are seeing draconian efforts today to roll back those rights to entrench the power of autocratic regimes. We cannot allow these authoritarian actions to go unchallenged. We have a responsibility to fortify the voting franchise for generations to come.

With aloha,

Kris Coffield

President, Imua Alliance



HA'AHEO, 'OHANA, KAULIKE, UI
Pride Family Justice Activate
WHERE PRIDE BECOMES POLITICAL POWER

Website: www.hokupac.org ♦ Email: info@hokupac.org

March 15, 2026

Senate's Committee on Government Operations
Hawai'i State Capitol
415 South Beretania Street
Honolulu, HI 96813

Hearing: Tuesday, March 17, 2026 at 3:05 PM

RE: STRONG SUPPORT for House Bill 322 – Relating to VOTER REGISTRATION.

Aloha Chair McKelvey, Vice-Chair Gabbard and fellow committee members,

This testimony on behalf of **HOKU PAC**, Hawai'i's LGBTQ+ political action committee dedicated to building queer political power and advancing policies that protect our communities. We write in **strong support of House Bill 322 HD 2**.

HOKU PAC submits testimony in **strong support** of HB 322, which authorizes state agencies to implement automatic voter registration when designated by the Office of Elections and requires eligible applicants for instruction permits, provisional licenses, driver's licenses, and state identification cards to be automatically registered or preregistered to vote unless they choose to opt out.

A healthy democracy depends on broad participation in the electoral process. HB 322 modernizes Hawai'i's voter registration system by streamlining the process and making it easier for eligible residents to exercise their fundamental right to vote. By integrating voter registration into routine interactions with state agencies such as those that issue driver's licenses and identification cards, the State can significantly increase registration rates, reduce administrative burdens, and ensure that voter rolls remain accurate and up to date.

Automatic voter registration has proven effective in other states by improving efficiency while maintaining voter choice through a clear opt-out option. This approach respects individual freedom while removing unnecessary barriers that have historically prevented eligible residents—particularly young voters, working families, Native Hawaiians, and members of marginalized communities—from participating fully in our democratic process.

For many LGBTQ+ people and other historically underrepresented communities, access to the ballot has been a critical tool for advancing equality and ensuring that government reflects the needs of all people. Policies that expand participation help ensure that our democracy includes the voices of every resident of Hawai'i.

HB 322 represents a commonsense, secure, and efficient way to strengthen civic engagement across our state. By allowing agencies designated by the Office of Elections to implement automatic voter registration, Hawai'i can continue its leadership in expanding access to the ballot while preserving voter choice and maintaining the integrity of our elections.

Mahalo for the opportunity to testify in strong support of this measure. HOKU PAC respectfully urges the Committee to pass HB 322 HD 2.

Paid for by HOKU PAC – Not Authorized by any Candidate or Candidate Committee



**Committee on Government Operations
Hawai'i Alliance for Progressive Action (HAPA) Strongly Supports HB322 HD2 Tuesday,
March 17, 2026, at 3:05 PM | Conference Room 225 & Videoconference**

Aloha Chair McKelvey, Vice Chair Gabbard, and members of the Committee,

HAPA strongly supports HB322 HD2, which strengthens Hawai'i's automatic voter registration system by shifting from an opt-in to an opt-out model.

Hawai'i's voter turnout numbers tell a clear story. In the 2024 primary, turnout dropped to around 32%. That is not a reflection of how much people care. It is a reflection of how many barriers still exist between eligible residents and the ballot box. Registration is one of the biggest ones.

HB322 HD2 fixes that in a practical, secure way. When eligible residents apply for or renew an instruction permit, provisional license, driver's license, or state ID, and they have provided verified proof of U.S. citizenship, their information will automatically be transmitted to register or preregister them to vote, unless they choose to opt out. It also authorizes the Office of Elections to designate additional state agencies to participate, as long as those agencies already collect and verify the same key information.

This bill does not change who is eligible to vote. It does not register non-citizens. It simply removes an unnecessary extra step for people who are already verified and already eligible.

The data backs this up. Research from the Center for American Progress found that automatic voter registration in Oregon brought in more than 116,000 people who otherwise would not have registered, and 40 percent of those new registrants were under 30. That is what removing barriers looks like in practice.

Beyond participation, this bill improves accuracy. Voter rolls stay more current when registration updates automatically as people move or renew their IDs. That reduces administrative errors and saves money on outreach and corrections down the line.

HAPA respectfully urges this committee to pass HB322 HD2.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read 'Anne Frederick'.

Anne Frederick, Executive Director
Hawai'i Alliance for Progressive Action

HB-322-HD-2

Submitted on: 3/15/2026 7:51:09 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Susan B Roberts Emery	Testifying for Green Party of Hawai'i	Support	Written Testimony Only

Comments:

Aloha Chair McKelvey, Vice Chair Gabbard, and members of the Committee,

My name is Susan RobertsEmery, as Co chair of the Green Party of Hawai'i, and on behalf of our members we are in Strong Support of HB322 HD2.

Hawai'i's voter turnout has been dropping, and one of the most straightforward fixes is making registration easier. Right now, eligible residents have to take an extra step to register even when they're already handing verified documents to the state . This bill removes that barrier without changing who is eligible to vote, without registering non-citizens, and while preserving every individual's right to opt out. It also keeps voter rolls more accurate and reduces administrative costs for election officials. Let's do this !

Green Party of Hawai'i urges you to PASS HB322 HD2 !

Mahalo,

Susan RobertsEmery

Green Party of Hawai'i

Paauilo

Dear Committee members,

My name is Camron Hurt Program Director of Common Cause Hawaii, I am writing in support of HB2132 Automatic Voter Registration. The current System is a remarkable step in ensuring access to the ballot box for all in the State. It is imperative that lawmakers improve our current program by passing SB 81 to adapt our system to an opt-out system. By making this change this would allow citizens to be registered to vote automatically while signing up for other services with the State. With greater access to voter registration, we can seek to improve not just voter turnout but also overall participation in democracy. It is for these reasons and more that I urge all members to vote in favor of HB2132

Hawaii Secure AVR: Cost Estimate

We have estimated the cost of implementing Secure AVR (“AVR”) in Hawaii, as outlined in HB2132. This analysis is based on the up-front and ongoing costs of implementing AVR in other states, savings from AVR implementation in other states, and factors specific to Hawaii. Based on this analysis, we estimate Hawaii would need to expend \$317,510 in up-front costs to implement AVR, and would incur \$78,273 per year in ongoing costs.

But those costs would be more than offset by the cost savings of implementing AVR.

Hawaii would see net **savings** of approximately **\$309,077** in the first year of

implementation, even when accounting for up front costs. If there is an election that year, the savings would be even greater—roughly **\$1,046,397**. Moreover, once the up-front costs have been incurred, Hawaii would see net savings of roughly **\$626,587** in off years and **\$1,363,907** in election years going forward.

Up-Front Cost (Tech Systems Upgrades)

The cost of implementing AVR varies by state but ranges from tens of thousands to a few hundred thousand dollars, as shown in the table below. We think the most reasonable comparison from the table below is New Mexico, since its population numbers are similar to Hawaii. Adjusted for Hawaii’s slightly smaller population, we estimate Hawaii would need to expend roughly **\$317,510** in up-front upgrades to its technology systems to implement AVR.

As the table shows, New Mexico has a “live link”, an optional feature that makes AVR more efficient by allowing for two-way information sharing between the DMV and the Secretary of State’s office. As written, HB2132 does not include a live link. If there is no live link, the cost of upgrading Hawaii’s tech systems is probably even lower than our estimate of \$317,510.

State	Total Up-Front Cost for AVR ¹	Cost to DMV	Cost to SOS/Dep't of Elections	Includes Cost of Live Link?
Colorado	\$148,840	\$130,840	\$18,000	Yes
Delaware	\$21,900	\$21,900	\$0	No
Minnesota	\$286,000	\$109,000	\$177,000	No
Oregon	\$829,261 ²	\$33,200	\$796,061	No
New Mexico	\$462,000	Unclear	Unclear	Yes
Nevada	\$1,082,830	Unclear	Unclear	No
Washington	\$644,500	\$497,000	\$147,500	No

Ongoing Costs

1 This analysis only includes a cost estimate for implementation AVR at the DMV. Estimating the cost of implementing AVR at other agencies (such as the state Medicaid agency), as some states have done, would require a separate analysis.

2 This cost includes declination mailers, which are paid for by the Oregon Secretary of State.

The two ongoing costs of AVR are the staff time required for elections officials to process registrations and the mailers that local elections offices must send to voters after they are automatically registered.

1. **Staff time:** A case study from Arizona found that processing an online voter registration cost roughly 3 cents of staff time.³ From the processing side, AVR is even more efficient than online voter registration. But for purposes of this cost estimate, we treat them the same.

Meanwhile, data from Colorado shows that in the first year of AVR implementation, the state likely registered or updated the registration of 660,775 voters. Adjusting for the number of eligible voters in Hawaii (which is lower than Colorado) and the percentage of unregistered voters in Colorado vs. Hawaii who will be signed up through AVR, we estimate Hawaii will register or update the registration of 146,999 voters in the first year of AVR (and likely even fewer after that, once Hawaii's unregistered population goes down because of AVR).⁴ The total processing cost of this will be roughly \$4,410.

3 The Costs of Modernizing Voter Registration Systems, ACLU, https://www.aclu.org/wp-content/uploads/publications/022415-aclu-voterregcostsonline_0.pdf, at p.13.

4 Univ. of Fl. Election Lab: 2024 General Election Turnout, <https://election.lab.ufl.edu/2024-general-election-turnout/> (provides eligible voter population by state); U.S. Census Bureau: Table 4a, https://www2.census.gov/programs-surveys/cps/tables/p20/587/vote04a_2024.xlsx (provides registration rates by state).

2. **Mailer cost:** The mailer sent to voters who are automatically registered can be a simple postcard with return postage pre-paid. The cost to produce it is therefore similar to other pieces of election mail (like change of address notices). When Minnesota implemented AVR, it estimated the cost at 50 cents per mailer.⁵

As discussed above, we estimate Hawaii would send mailers to roughly 146,998 voters in the first year. At a cost of 50 cents per mailer, this would total roughly \$73,500.

Finally, a small percentage of those mailers will be returned because the voter does not want to register, which means the elections office will need to pay for return postage. In 2023, Minnesota estimated the return postage cost at 45 cents per mailer.⁶ And in its first year of AVR, the return rate in Colorado for newly registered voters was 0.55%. There is no reason to think the return rate for voters whose registration is updated by AVR will be any higher. The cost of postage is therefore negligible—based on this analysis, we estimate it at \$364 per year.

5 Minn. Legislature: Fiscal Notes Estimate:

<https://mn.gov/mmbapps/fnsearchlbo/?number=HF3&year=2023> (scroll to document HF3-4E, p. 8). ⁶ Minn. Legislature: Fiscal Notes Estimate:

<https://mn.gov/mmbapps/fnsearchlbo/?number=HF3&year=2023> (scroll to document HF3-4E, p. 8).

Therefore, we estimate the total annual ongoing cost of implementing AVR at **\$78,274** per year.

Cost Savings

Hawaii will likely see very significant cost savings from implementing AVR, as has been the case in other states.

1. **DMV Staff Time:** AVR significantly reduces transaction times at the DMV, and therefore saves money in the form of staff time. To estimate these cost savings, we multiplied a \$20 average hourly wage for a Hawaii DMV employee,⁶ a 90 second reduction in the time per DMV transaction,⁷ and the 1,262,693 annual number of new vehicle registrations at the Hawaii DMV in 2023.⁸

6 Ziprecruiter: Dmv Salary in Hawaii, <https://www.ziprecruiter.com/Salaries/Dmv-Salary--in-Hawaii> (last accessed Sept. 18, 2025).

7 Motor Voter Registration: Colorado Case Study, Democracy Fund (Dec. 2021), https://electionline.org/wp-content/uploads/2022/01/Colorado-Case-Study_12.2021-Update1.pdf.

8 U.S. Dep't of Transportation: State Motor Vehicle Registrations 2023 (Nov. 2024), https://www.fhwa.dot.gov/policyinformation/statistics/2023/mv1.cfm#:~:text=Table_title:%20Table%20MV

This analysis certainly undercounts the number of DMV transactions, but that undercounting is offset by the fact some DMV transactions will be reduced by less than 90 seconds (if the voter does not show proof of citizenship or non-citizenship).

Based on this estimate, the Hawaii DMV will save roughly **\$631,346** per year if the state implements AVR.

2. **Paper Registration Processing Costs:** A 2016 study estimated the cost of processing paper voter registration applications based on county size. In that study, labor costs rely on 2016 estimates of the average cost of full-time staff processing applications, following up with applicants about missing or erroneous information, and temporary staff processing applications.⁹ The table below pulls from that study and adjusts the labor costs for inflation using the Bureau of Labor Statistics inflation

%2D1%20Table_content:%20header:%20%7C%20STATE,MOTOR%20VEHICLES:%20%7C%20:%20%7C%20:%20%7C.

⁹ Doug Chapin & David Kuennen, The Cost (Savings) of Reform: An Analysis of Local Registration-Related Costs and Potential Savings Through Automatic Voter Registration (Mar. 2017), https://www.vote.org/wp-content/uploads/registration-related-costs_030817.pdf.

calculator.¹⁰ It then multiplies those costs by the number of paper applications submitted to each county in

the 2022 election cycle, which is available in federal Election Assistance Commission data.

We estimate the annual cost savings from reducing paper-based voter registration forms to be roughly **\$73,513**.

Estimated Labor Cost of Paper-Based Registration in Hawaii, 2022 Election Cycle

County Name	Paper-based processed	Est. Avg. Labor forms Cost per Form	Est. Total Labor Cost
Honolulu	6,526	\$4.63	\$30,215.38
Hawaii	3,013	\$7.97	\$24,013.61
Maui/Kalawao	1,641	\$7.97	\$13,078.77
Kauai	868	\$7.15	\$6,206.20
Statewide	12,048		\$73,513.96

10 U.S. Bureau of Labor Statistics: CPI Inflation Calculator, https://www.bls.gov/data/inflation_calculator.htm (last accessed Sept. 18, 2025).

3. **Reducing Undeliverable Mail Ballots:** AVR can similarly achieve savings by reducing the number of undeliverable vote-by-mail ballots, because most voters will have a current registration address. This is particularly significant in a state like Hawaii where every registered voter receives a mail ballot.

According to Election Assistance Commission data, Hawaii sent out 733,360 mail ballots in 2022.¹¹ In other places that send mail ballots to every voter, undeliverable rates can be around 11%.¹²¹³ Based on an analysis of Washington state, the cost of a mail ballot in 2012 was \$3.24.¹⁴ Adjusted for inflation, that is now roughly \$4.57 per ballot.

Assuming a similar mail ballot cost in Hawaii and an 11% undeliverable rate, Hawaii would save roughly **\$737,320** each election year (including both the primary and the general election) in reducing undeliverable ballot costs.

11 U.S. Election Assistance Comm.: EAVS Data Interactive (July 2025), <https://www.eac.gov/research-and-data/studies-and-reports/eavs-data-interactive>.

12 Martin Austermuhle, Audit Finds High Number Of D.C. Mail Ballots Returned As ‘Undeliverable’ In

13 , DCIST (Nov. 16, 2021), <https://dcist.com/story/21/11/16/large-number-of-dc-mail-ballots-were-returned-as-undeliverable-in-2020/>.

14 Tracking the Costs of Mail Voting in Washington, Pew (Sept. 9, 2014), <https://www.pew.org/en/research-and-analysis/articles/2014/09/09/tracking-the-costs-of-mail-voting-in-washington>.

In short, based on the above estimates, Hawaii can expect gross savings of roughly \$704,860 in an off-year and \$1,442,180 in an election year if it implements AVR. Accounting for the ongoing costs of implementing AVR, Hawaii can expect net savings of **\$626,587** in an off-year and **\$1,363,907** in an election year after AVR is initially implemented.

HB-322-HD-2

Submitted on: 3/12/2026 3:44:32 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
William Caron	Individual	Support	Written Testimony Only

Comments:

Aloha Chair, Vice Chair, and members of the committee,

I am writing in **strong support of HB322**, which would authorize state agencies to implement automatic voter registration when designated by the Office of Elections, including at driver's licensing offices. This bill is a straightforward, modern update to how we register voters—one that will strengthen democracy by making registration the rule, not the exception.

HB322 removes unnecessary barriers to the ballot. Under this bill, eligible applicants for instruction permits, provisional licenses, driver's licenses, and state ID cards would be automatically registered or preregistered to vote unless they choose to opt out. This shifts the default from "registration requires effort" to "registration is automatic unless you decline." For young people, for working families, for anyone who has ever missed a registration deadline or found the process confusing—this is transformative.

Automatic registration is both efficient and secure. It relies on information already provided to state agencies, reducing paperwork, eliminating duplicate data entry, and minimizing errors. It ensures that voter rolls are more accurate and up to date, because they draw directly from verified sources. And because the process is opt-out, it preserves every individual's right to choose whether to participate.

This bill strengthens democracy by making it work for everyone. Voter registration should not be a hurdle to clear; it should be a seamless part of interacting with your government. When we make it easier to register, we make it easier to participate. And when more people participate, our elections better reflect the will of the people.

States across the country have already adopted automatic voter registration with success. It is time for Hawai'i to do the same.

I urge you to pass this bill. Mahalo for the opportunity to testify.

HB-322-HD-2

Submitted on: 3/12/2026 7:23:31 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Tim Huycke	Individual	Support	Written Testimony Only

Comments:

I strongly support HB322.

HB-322-HD-2

Submitted on: 3/12/2026 7:41:43 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Lily Troy MD	Individual	Support	Written Testimony Only

Comments:

I support HB322 HD2

HB-322-HD-2

Submitted on: 3/13/2026 7:50:59 AM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Lois Langham	Individual	Support	Written Testimony Only

Comments:

Given Hawaii's low voter turnout, I support efforts to make voting easy and accessible. Please pass this bill.

HB-322-HD-2

Submitted on: 3/13/2026 10:13:43 AM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
James E Raymond	Individual	Support	Written Testimony Only

Comments:

Thank you. I am a member of Indivisible Windward.

HB-322-HD-2

Submitted on: 3/13/2026 11:22:31 AM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Marcela Montalto	Individual	Support	Written Testimony Only

Comments:

Automatic voter registration helps strengthen democracy by making participation in elections easier and more accessible. By automatically registering eligible citizens when they interact with government agencies—such as when obtaining or renewing a driver’s license—it reduces bureaucratic barriers that often prevent people from voting. This system improves the accuracy of voter rolls, lowers administrative costs over time, and ensures that more eligible citizens have the opportunity to exercise their fundamental right to vote. Ultimately, automatic voter registration supports a more representative and inclusive democratic process.

HB-322-HD-2

Submitted on: 3/13/2026 2:02:59 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Kehaulani Coleman	Individual	Support	Written Testimony Only

Comments:

Thank you

HB-322-HD-2

Submitted on: 3/13/2026 3:20:14 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Cristina Holt	Individual	Support	Written Testimony Only

Comments:

Aloha Chair McKelvey, Vice Chair Gabbard, and members of the committee.

My name is Cristina Holt. I am a resident of Hilo, Hawaii Island, and I strongly support HB 322 HD2.

Hawaii's 2024 primary turnout was around 32%. That is not because people do not care. It is because registration is still a barrier for too many eligible residents, especially young people, working families, and people who move frequently. And it is a barrier that does not need to exist.

Right now, eligible residents have to take an extra step to register even when they are already handing verified information to the state at the DMV. That is silly. HB 322 HD2 fixes it by automatically registering eligible applicants during driver's license and state ID transactions unless they choose to opt out. It does not change who is eligible to vote. It does not register non-citizens. It just removes an unnecessary extra step for people who are already verified and already eligible.

This works. When Oregon did it, automatic voter registration brought in over 116,000 people who otherwise would not have registered, and 40 percent of them were under 30. That is what removing barriers looks like in practice.

It also keeps voter rolls more accurate and reduces administrative costs. There is really no downside here.

Please pass HB 322 HD2.

Mahalo for the opportunity to testify.

Cristina Holt Hilo, Hawaii Island

HB-322-HD-2

Submitted on: 3/14/2026 1:42:47 AM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Kanani Kai	Individual	Support	Written Testimony Only

Comments:

I strongly SUPPORT HB322.

Mahalo,

Kanani Kai

Member Indivisible Hawaii

HB-322-HD-2

Submitted on: 3/14/2026 8:00:29 AM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Kathleen Dickson	Individual	Support	Written Testimony Only

Comments:

I am writing in strong support of HB322 HD2. Making it easy for legal residents to register to vote makes sense. Licensing requires proof of citizenship and recent efforts by individuals in the federal government to make it more difficult to vote by requiring the same proof at the polls are appalling. Hawai'i has an excellent voting system that should be protected. Enabling every legal residents to easily register to vote as an adjunct to licensing should be implemented.

thank you for the opportunity to provide testimony.

Kathleen "kate" Dickson

Waikiki

HB-322-HD-2

Submitted on: 3/14/2026 8:34:13 AM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Denize Machit	Individual	Support	Written Testimony Only

Comments:

Please support this bill. Voting is an important right that too few of us exercise. Anything we can do to get all eligible voters to participate in voting is worth our time and money.

Mahalo for allowing me to express my thoughts,

Denize Machit

COMMITTEE ON GOVERNMENT OPERATIONS

Senator Angus L.K. McKelvey, Chair

Senator Mike Gabbard, Vice Chair

HEARING:

Tuesday, March 17, 2026 at 3:05 pm

Conference Room 225 & Videoconference

TESTIMONY IN SUPPORT OF HB 322, HD2 - RELATING TO VOTER REGISTRATION.

Aloha Chair McKelvey, Vice Chair Gabbard, Sen. Hashimoto for my district, and Members of the Committee,

My name is Christine Andrews and I am a long-time resident of Wailuku, Maui. I write to you today in **support of HB 322, HD2, Relating to Voter Registration**. This bill authorizes state agencies to implement automatic voter registration if designated by the Office of Elections; and requires eligible applicants for instruction permits, provisional licenses, driver's licenses, and identification cards to be automatically registered or preregistered to vote unless the applicant opts out.

I have been an attorney licensed in the State of Hawai'i for over 25 years. I have taken an oath to defend the Constitution and to uphold rule of law. I am deeply troubled by what I have seen over the course of the past year, egregious violations of the Constitution that the courts are standing against. A Minnesota judge recently said in a court ruling that Immigration and Customs Enforcement had violated 96 court orders in Minnesota alone in January, more than most federal agencies have since their creation¹. The attacks on democratic principles by the federal executive branch are unprecedented.

Mark Elias, noted voting and elections attorney, has stated in a post to Democracy Docket:

The Republican Party is a party of vote suppressors and election deniers. This is no longer a flaw in some members of the GOP; it is the defining feature of the MAGA takeover. Undermining free and fair elections is the central tenet of Trumpism in 2025, and it will be the leading strategy of the GOP in 2026 and beyond....

For the next 11 months, we must approach each day with these questions: What can we do to protect free and fair elections? How can we counter what the GOP is doing? How can we advance the voting rights of every eligible citizen and ensure their ballots are accurately counted and elections properly certified?²

As an attorney and concerned citizen, I request that you **support HB322, HD2** as one mechanism by which we can protect the right to vote and access to that right. Many states already have automatic voter registration, and ensuring an engaged electorate by enhancing access to the vote is critical at this time.

Mahalo nui for taking the threat to democracy and the right to vote seriously,

Christine L. Andrews, J.D.

¹<https://www.npr.org/2026/01/31/nx-s1-5693175/judge-says-immigration-and-customs-enforcement-has-violated-96-court-orders-this-month-in-minn>

² <https://newsletters.democracymocket.com/-the-greatest-threat-to-democracy>

HB-322-HD-2

Submitted on: 3/14/2026 10:51:27 AM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Beverley Brand	Individual	Support	Written Testimony Only

Comments:

Aloha Senators McElvey and Gabbard,

I am strongly in favor of this bill.

Beverley Brand

Waikoloa

HB-322-HD-2

Submitted on: 3/14/2026 10:06:48 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Robert Justice, M.D.	Individual	Support	Written Testimony Only

Comments:

Aloha,

I am a resident of Kapolei and member of the Indivisible Hawai`i Statewide Network. I am writing to provide testimony of my strong support for HB322. The bill authorizes state agencies to implement automatic voter registration if designated by the Office of Elections. It requires eligible applicants for instruction permits, provisional licenses, driver's licenses, and identification cards to be automatically registered or preregistered to vote unless the applicant opts out. The effective date is 7/1/3000.

Mahalo,

Robert L. Justice, M.D.

HB-322-HD-2

Submitted on: 3/14/2026 11:39:12 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Gaye Chan	Individual	Support	Written Testimony Only

Comments:

This is a sensible and fair approach in encouraging the general public to engage in the election.

HB-322-HD-2

Submitted on: 3/15/2026 11:53:44 AM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Brodie Lockard	Individual	Support	Written Testimony Only

Comments:

I support HB322 HD2.

HB-322-HD-2

Submitted on: 3/15/2026 1:15:02 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Carrie Ann Shirota	Individual	Support	Written Testimony Only

Comments:

Aloha Chair McKelvey, Vice Chair Gabbard, and members of the Committee,

I'm submitting testimony in strong support of **H.B. 322 H.D.2 Relating to Voter Registration.**

Voting is an act of civic engagement, that allows people to have a voice in choosing elected officials whose decisions impact our lives, families, and communities.

Data shows that Hawai'i's voter turnout has been dropping. To increase voter turn-out and ultimately civic engagement, this bill provides a straightforward fix by making voter registration easier.

HB322 HD2 would automatically registering eligible applicants during DMV transactions, unless they opt out. It doesn't change who can vote but simply removes an unnecessary barrier for people who are already eligible.

I urge you to pass HB322 HD2 Relating to Voter Registration.

Sincerely,

Carrie Ann Shirota, Esq.

Honolulu, Hawai'i

HB-322-HD-2

Submitted on: 3/15/2026 2:35:39 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Ted Bohlen	Individual	Support	Written Testimony Only

Comments:

I **SUPPORT** automatic voter registration

HB-322-HD-2

Submitted on: 3/15/2026 3:02:37 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Calvin Black	Individual	Support	Written Testimony Only

Comments:

I am a member of Indivisible. Thank you for supporting this bill.

HB-322-HD-2

Submitted on: 3/15/2026 3:09:18 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Georgia L Hoopes	Individual	Support	Written Testimony Only

Comments:

Aloha Chair McKelvey, Vice Chair Gabbard, and members of the Committee,

I'm submitting testimony in strong support of HB322 HD2.

Hawai'i's voter turnout has been dropping, and one of the most straightforward fixes is making registration easier. Right now, eligible residents have to take an extra step to register even when they're already handing verified information to the state. That is silly.

HB322 HD2 changes that by automatically registering eligible applicants during DMV transactions, unless they opt out. It doesn't change who can vote. It just removes an unnecessary barrier for people who are already eligible.

Please pass HB322 HD2.

Mahalo,

Georgia Hoopes, Kalaheo

HB-322-HD-2

Submitted on: 3/15/2026 3:37:41 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Brett Kulbis	Individual	Oppose	Written Testimony Only

Comments:

Chair McKelvey and Committee Members,

My name is Brett Kulbis, I'm a 26yr retired Navy Veteran, who took a solemn oath to defend the Constitution from all enemies foreign and domestic, and that oath didn't expire when I retired. I live in Ewa Beach.

I STRONGLY OPPOSE BILL HB-322 HD2.

Those of us who wore the uniform did it so every eligible citizen could have a voice – not so that the guardrails around our elections would be treated as optional. We fought to defend a system where:

- Every eligible citizen can register and vote without unnecessary obstacles.
- Every ballot in the box is lawful, traceable to an eligible voter, and counted once.
- Public confidence in the outcome is strong because the process is transparent, auditable, and disciplined.

HB-322 HD2 moves Hawai'i away from that balance. It aggressively expands automatic voter registration (AVR) at the DMV and other state agencies, but does so in ways that weaken evidence of voter intent, expand the attack surface for error and abuse, and rely too heavily on after-the-fact mailers instead of clear, in-person consent at the point of transaction.

Concern #1: Default registration without clear, contemporaneous consent

Under this bill, routine DMV and ID transactions automatically become voter registration or preregistration actions unless the person later notices a mailed form and sends it back to decline or block updates.

For a veteran, that is troubling. We do not treat enlistment papers as valid because someone failed to send back a postcard saying “No.” We require a clear, explicit signature on a clearly explained decision.

Here:

- The prior opt-in structure – where a citizen actively chose “Yes, I want to register to vote” – is replaced with an “opt-out by mail later” system.
- Non-response to a piece of mail is treated as consent to create or modify a voter registration record.
- Yet that person may never have realized that a driver’s license or ID renewal would automatically trigger a legally significant election action.

This undermines the evidentiary value of voter intent and invites disputes about whether someone truly meant to register, especially if problems or irregularities arise later.

Concern #2: Citizenship verification is referenced, but not rigorously defined

HB-322 HD2 references proof or “external verification” of U.S. citizenship, and bars transmission when documents show the person is not a citizen. That is good direction, but not enough detail.

From a security and integrity standpoint:

- “External verification” is undefined. Which databases? What match standards? What error rates are acceptable?
- The bill allows reliance on past DMV records that supposedly captured proof of citizenship in a previous transaction, without requiring fresh documentation at the moment of automatic registration.
- There is no clear statutory requirement for periodic audits of these citizenship flags, or for transparent reporting when mismatches or errors are discovered.

In the military, we do not accept “it’s in some database” as sufficient when it comes to identity. We demand verifiable standards, logs, and accountability.

Concern #3: Ineligible registrations can still slip through while liability is blurred

The bill tries to shield ineligible individuals by saying that unless they knowingly and wilfully try to register, their transmitted record “shall not constitute a completed voter registration application” and they are not considered to have affirmatively registered.

But in practice:

- The system is designed so that the DMV or agency transaction itself serves as the registration application.
- The person can be added to the rolls if the clerk processes the data and the person does not mail back the opt-out form in time.

- Errors in coding citizenship status or eligibility at any participating agency can silently create registrations that do not reflect the law or the individual's true status.

This is a classic “no man’s land” for accountability: the individual says, “I never meant to register,” and the State says, “The system auto-registered you and nobody caught the error.” Veterans understand that when responsibility is this diffuse, discipline and trust both suffer.

Concern #4: Retroactive ratification undermines trust

The bill contains a particularly troubling provision: if an applicant returns the form declining registration after their data has been transmitted, but votes in an election before that decline is processed, the decline “shall be of no force and effect” and the person is deemed registered as of the earlier transaction date.

That looks like retroactive ratification of a registration the person actually tried to reject.

For someone who swore an oath to support and defend the Constitution, this language is a red flag:

- It prioritizes administrative convenience over the voter’s explicit later statement “I do not want to be registered.”
- It creates a scenario where both sides can argue over whether the ballot was truly lawful and intended, fueling post-election conflict instead of reducing it.

Concern #5: Expanded data sharing with weakly specified safeguards

HB-322 HD2 greatly expands the sharing of personal identity information and digitized signatures across DMV, county, elections, and certain social services systems for “any ... election purposes” as determined by administrative officials.

As a veteran, I cannot ignore the security implications:

- More systems and more personnel with access to sensitive data means a larger attack surface for identity-based fraud or insider misuse.
- The bill does not embed detailed cybersecurity standards, logging requirements, or intrusion-detection and audit obligations in statute; it largely trusts that agencies will handle it.
- It also does not require regular, public reporting on breaches, misuse, or systemic errors related specifically to automatic registration data flows.

In a world of increasing cyber threats, especially from hostile foreign actors who would love to undermine American confidence in our elections, this is a serious gap.

Concern #6: No explicit, robust audit trail and list-maintenance regime for AVR

Veterans are trained to trust, but verify. HB-322 HD2 talks about how data will flow, but says very little about how the State will regularly test, reconcile, and correct the results.

Key gaps:

- No explicit requirement for periodic, independent audits of AVR-generated registrations versus underlying documentation (citizenship, residence, age).
- No requirement for cross-agency duplicate checks and reconciliation procedures when multiple agencies feed into the voter file.
- No statutory triggers for list maintenance based on status changes known to other agencies (e.g., moving out of state, losing eligibility), even though these same agencies are being empowered to register people automatically.

When you automate input without automating verification and maintenance, you are building complexity into the system faster than you are building confidence.

As a veteran, I am not opposed to helping eligible citizens register to vote. In fact, I want every eligible U.S. citizen and Hawai'i resident to participate. But access and integrity are not competing values; they are mutually reinforcing. When we cut corners on identification, consent, auditing, and accountability, we are not “modernizing” – we are lowering the standard that generations of service members fought to protect.

If the Legislature wishes to pursue automatic voter registration, it should do so with:

- Clear, explicit, in-person consent at the point of transaction.
- Well-defined, auditable citizenship and eligibility verification.
- Strong, statutory cybersecurity and data-protection measures.
- Mandatory audits, list-maintenance rules, and transparent reporting.

Without these safeguards, HB322 HD2 risks undermining the very public trust that gives our election outcomes their legitimacy.

For the sake of the veterans who swore an oath, and for the citizens whose confidence in elections is already fragile, I respectfully urge you to defer HB-322 HD1 indefinitely.

Mahalo for the opportunity to submit testify and for your service to the people of Hawai'i.

Brett Kulbis
U.S. Navy Retired

HB-322-HD-2

Submitted on: 3/15/2026 5:21:15 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Gail Morrison	Individual	Support	Written Testimony Only

Comments:

I am in favor of authorizing state agencies to implement automatic voter registration if designated by the Office of Elections. I am in favor of requiring eligible applicants for instruction permits, provisional licenses, driver's licenses, and identification cards to be automatically registered or preregistered to vote unless the applicant opts out.

Thank you, Gail Morrison

HB-322-HD-2

Submitted on: 3/15/2026 5:22:54 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Marcia Kemble	Individual	Support	Written Testimony Only

Comments:

Greetings Committee Members,

I'm writing in strong support of HB322 HD2. By automatically registering eligible applicants during DMV transactions—unless they opt out—it doesn't change who can vote; it just removes an unnecessary barrier for people who are already eligible. This is an excellent way to encourage more participation in our elections.

Mahalo for your attention.

Marcia Kemble

Makiki

HB-322-HD-2

Submitted on: 3/15/2026 5:32:56 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Melissa Barker	Individual	Support	Written Testimony Only

Comments:

Honorable Chair McKelvey, Vice Chair Gabbard, and Members of the Committee,

I am writing to ask that you support of HB322 HD2 which would make voter registration easier.

Thank you for your attention and consideration.

Melissa Barker

Kapaa, HI

HB-322-HD-2

Submitted on: 3/15/2026 5:57:20 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Shay Chan Hodges	Individual	Support	Written Testimony Only

Comments:

Aloha Chair McKelvey, Vice Chair Gabbard, and members of the Committee,

I'm submitting testimony in strong support of HB322 HD2.

Hawai'i's voter turnout has been dropping, and one of the most straightforward fixes is making registration easier. Right now, eligible residents have to take an extra step to register even when they're already handing verified information to the state. That is silly.

HB322 HD2 changes that by automatically registering eligible applicants during DMV transactions, unless they opt out. It doesn't change who can vote. It just removes an unnecessary barrier for people who are already eligible.

Please pass HB322 HD2.

--Shay Chan Hodges, Maui, Hawaii

HB-322-HD-2

Submitted on: 3/15/2026 6:41:02 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Judith Mura	Individual	Support	Written Testimony Only

Comments:

STRONGLY SUPPORT HB322 HD2

HB-322-HD-2

Submitted on: 3/15/2026 7:32:31 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Inam Rahman	Individual	Support	Written Testimony Only

Comments:

Testimony in Support with Suggested Safeguards

HB322 HD2 – Relating to Automatic Voter Registration

Hearing: Tuesday, March 17, 3:05 PM

Conference Room 225

Aloha Chair McKelvey, Vice Chair Gabbard, and Members of the Committee,

I support HB322 HD2 because it modernizes Hawaii’s voter registration system and removes unnecessary barriers for eligible citizens who wish to participate in our democratic process. When residents apply for or renew a driver’s license or state ID, they already provide verified information to the state. Using that same verified information to automatically register eligible citizens—while allowing them to opt out—is a practical and efficient step that can help improve voter participation.

Importantly, this bill does not change who is eligible to vote. It simply makes the registration process easier for those who are already eligible.

Hawaii’s voter turnout in recent elections has been relatively low, and simplifying the registration process can help ensure that more eligible citizens have the opportunity to participate. Automatic voter registration can also help keep voter rolls more accurate while reducing administrative work for election officials.

At the same time, I encourage the Legislature to ensure strong safeguards, including clear notice to applicants that registration will occur unless they decline, reliable verification of citizenship records, and secure data-sharing practices between agencies.

With these safeguards in place, HB322 HD2 can strengthen voter participation while maintaining public confidence in Hawaii's election system. I respectfully urge the committee to pass this measure.

Mahalo,

Dr. Inam Rahman

Honolulu, Hawaii

HB-322-HD-2

Submitted on: 3/15/2026 8:15:20 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Elizabeth Winternitz	Individual	Support	Written Testimony Only

Comments:

Aloha Chair McKelvey, Vice Chair Gabbard, and members of the Committee,

I'm submitting testimony in strong support of HB322 HD2.

Hawai'i's voter turnout has been dropping, and one of the most straightforward fixes is making registration easier. Right now, eligible residents have to take an extra step to register even when they're already handing verified information to the state.

HB322 HD2 changes that by automatically registering eligible applicants during DMV transactions, unless they opt out. It doesn't change who can vote while removing an unnecessary barrier for people who are already eligible.

Increasing voter participation is core to encouraging better representation and engagement in the democratic process.

Please pass HB322 HD2.

Mahalo,

Elizabeth Winternitz, Kula, Maui

HB-322-HD-2

Submitted on: 3/15/2026 9:31:27 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Jesse Hutchison	Individual	Support	Written Testimony Only

Comments:

I strongly support this bill.

Thank you!

HB-322-HD-2

Submitted on: 3/16/2026 8:10:44 AM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Kiana Lee	Individual	Support	Written Testimony Only

Comments:

Aloha,

I am testifying in **strong support** of HB322. This bill will remove an unnecessary hurdle for voter registration for individuals who are already providing the necessary documents to the state. For a strong democracy, it is important that as many citizens are given the opportunity to have their voices heard during elections as possible.

Mahalo.

HB-322-HD-2

Submitted on: 3/16/2026 8:52:33 AM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Nanea Lo	Individual	Support	Written Testimony Only

Comments:

Hello Chair McKelvey, Vice Chair Gabbard, and members of the Committee,

I'm submitting testimony in strong support of HB322 HD2.

Hawai'i's voter turnout has been dropping, and one of the most straightforward fixes is making registration easier. Right now, eligible residents have to take an extra step to register even when they're already handing verified information to the state. That is silly.

HB322 HD2 changes that by automatically registering eligible applicants during DMV transactions, unless they opt out. It doesn't change who can vote. It just removes an unnecessary barrier for people who are already eligible.

Please pass HB322 HD2.

Me ke aloha 'āina,

Nanea Lo, 96826

Sierra Club of Hawai'i Member

Hawai'i Workers Center Board Member

Clean Elections Hawai'i Member

Honolulu Tenants Union Member

350 Hawai'i Member

Carbon Cashback Hawai'i Member

Hawai'i Tax Fairness Coalition Member

HB-322-HD-2

Submitted on: 3/16/2026 9:27:49 AM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
John Fitzpatrick	Individual	Support	Written Testimony Only

Comments:

Aloha,

let's make it easier for state residents to vote. Streamline the process by getting registered to vote when you get your Hawaii state drivers license. This would surely help ease the confusion for our young people who may be voting for the first time.

Mahalo,

Fitz

**Representative Angus L. K. McKelvey, Chair, Senator Mike Gabbard, Vice
Chair, Members**

COMMITTEE ON GOVERNMENT OPERATIONS

HB 322 HD2

**Tuesday, 17 March 2026
03:05 a.m.
CR 225 & Videoconference**

Aloha kākou,

Voter turnout has been terribly disappointing. I urge you to support this measure. The system already has in place an identification protocol in place shared by more than one department. We need not make it more difficult to vote.

I fully support this measure.

Mahalo a nui loa,

Robert Nawahine Mansfield, Jr.
Moilili

HB-322-HD-2

Submitted on: 3/16/2026 11:16:34 AM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Ann V Saffery	Individual	Support	Written Testimony Only

Comments:

Aloha Chair McKelvey, Vice Chair Gabbard, and members of the Committee,

I'm submitting testimony in strong support of HB322 HD2.

Hawai'i's voter turnout has been dropping, and one of the most straightforward fixes is making registration easier. Right now, eligible residents have to take an extra step to register even when they're already handing verified information to the state. That is silly.

HB322 HD2 changes that by automatically registering eligible applicants during DMV transactions, unless they opt out. It doesn't change who can vote. It just removes an unnecessary barrier for people who are already eligible.

Please pass HB322 HD2.

Mahalo,

Ann V Saffery

Honolulu, HI

HB-322-HD-2

Submitted on: 3/16/2026 11:30:51 AM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Janet Teare	Individual	Support	Written Testimony Only

Comments:

Thank you for supporting this bill to provide Automatic voter registration in Hawaii. I'm a member of East Hawaii Indivisible.

HB-322-HD-2

Submitted on: 3/16/2026 12:50:48 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Ruta Jordans	Individual	Support	Written Testimony Only

Comments:

Hawai'i's voter turnout has been dropping, and one of the most straightforward fixes is making registration easier. Right now, eligible residents have to take an extra step to register even when they're already handing verified information to the state. That is unnecessary.

HB322 HD2 changes that by automatically registering eligible applicants during DMV transactions, unless they opt out. It doesn't change who can vote. It just removes an unnecessary barrier for people who are already eligible.

Please pass HB322 HD2.

HB-322-HD-2

Submitted on: 3/16/2026 1:33:10 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Pamela Elders	Individual	Support	Written Testimony Only

Comments:

Aloha Chair McKelvey, Vice Chair Gabbard, and members of the Committee,

This testimony is submitted in strong support of HB322 HD2.

Hawai'i's voter turnout has been dropping, and one of the most straightforward fixes is making registration easier. Right now, eligible residents have to take an extra step to register even when they're already handing verified information to the state. That is unnecessary.

HB322 HD2 changes that by automatically registering eligible applicants during DMV transactions, unless they opt out. It doesn't change who can vote. It just removes an unnecessary barrier for people who are already eligible.

We must take steps to counter voter suppression efforts.

Please pass HB322 HD2.

Mahalo,

Pam Elders

Laupahoehoe, HI

HB-322-HD-2

Submitted on: 3/16/2026 1:57:40 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Jessica Kuzmier	Individual	Support	Written Testimony Only

Comments:

Aloha, I'm writing in favor of this bill because I believe any policy that makes registering to vote easier is a win for all of us and our democracy. I especially like that this insures citizenship status which is a concern for many people and may provide more assurance for them. Mahalo.



Protect Democracy
Move Forward

www.indivisiblehawaii.org
info@indivisiblehawaii.org

LATE

To: Chair McKelvey, Vice Chair Gabbard, and Members of the Committee
Hearing Date/Time: 03-17-26 3:05 PM
Place: Hawaii State Capitol, Conference Room 225
Re: Comments on HB322 HD2

Dear Chair McKelvey, Vice Chair Gabbard, and Members of the Committee,

On behalf of Indivisible Hawai'i, I am submitting comments on HB322 HD2, which seeks to improve the state's automatic voter registration system by making it an opt-out program rather than an opt-in one.

Although it is true that Hawai'i has a substantial number of eligible voters who are not registered, resulting in low voter turnout election after election, we believe the approach proposed in HB322 HD2 is ill-advised. Rather, an opt-in program that **requires** applicants for instruction permits, driver's licenses, provisional licenses, or state identity cards to **affirm** their desire and eligibility to be registered voters is preferable to the opt-out alternative. The possibility of accidental registration of an ineligible resident who subsequently misses or misunderstands the opt-out notification is real and could lead to harm for that person in further interactions with state or federal offices.

In addition, HB322 HD2 proposes that "any state agency" that collects, processes, and stores the requisite information can be designated to implement automatic voter registration. Yet the bill does not provide for funding necessary to train staff on new procedures, modifications and enhancements to digital systems, or explanatory documentation to applicants.

In sum, while we support the intent of this bill to simplify the voter registration process, we urge the committee to adopt an effective date for this measure to allow for further consideration and amendment.

Sincerely,

Marlene Thom

Indivisible Hawai'i Good Government & Secure Elections team

The mission of the 14-chapter Indivisible Hawai'i Statewide Network (IHSN) is to protect Hawai'i and democracy by defending civil rights, communities and values, most importantly, Hawai'i's Constitutionally protected spirit of Aloha. In October 2025, IHSN with other partners turned out over 22,000 residents on all major islands to say No Dictators! and to stand up for democracy. This call-to-action was part of Indivisible national's mobilization of more than 7 million across the country as the voice of the people, committed to election integrity and to evolving as a place of equity, opportunity and peace.



LATE

Committee: Government Operations
Hearing Date/Time: Tuesday, March 17, 2026, at 3:05 PM
Place: Conference Room 225 & Via Videoconference
Re: **Testimony of the ACLU of Hawai'i in SUPPORT of HB322 HD2 Relating to Voter Registration**

Dear Chair McKelvey, Vice Chair Gabbard, and Members of the Committee:

The ACLU of Hawai'i **supports HB322 HD2**, which allows for the implementation of automatic, opt-out voter registration when eligible applicants for instruction permits, provisional licenses, driver's licenses, and identification cards.

One of the most important mechanisms to a healthy democracy is easy access to voting. On this front, Hawaii has made positive strides in recent years. All-mail voting, while not without its challenges, has seen participation in local elections increase since its implementation. Similarly, the Legislature saw the wisdom in automatic, opt-in, voter registration.

This bill continues that positive trend by switching our current automatic voter registration (AVR) system from an opt-in to an out-out approach.

A 2024 study published by the Berkeley Initiative for Young Americans found that¹:

“[T]he general presence of AVR increases young voter turnout by 3.2%; Front-end opt-out AVR policies increase young voter turnout by 2.8% and back-end opt-out AVR policies increase young voter turnout by 3.9%. These results show statistically significant increases in young voter turnout when either type of AVR is present, and suggests that expanding AVR in all states, particularly with back-end opt-out AVR mechanisms, could encourage further young voter participation and enfranchisement.”

¹ Easy as Clicking 'Yes': How Automatic Voter Registration is Powering Up Youth Votes. October 2024. https://youngamericans.berkeley.edu/wp-content/uploads/2024/09/2024.09.26-AVR_working_paper.pdf.

And the benefits extend beyond reducing barriers to voting. According to the Brennan Center for Justice, AVR can keep “voter rolls more accurate by creating a constant stream of updates between registration agencies and election officials.”²

Finally, there has been some concern raised that moving to an opt-out AVR system might impose negative unintended consequences for our immigrant neighbors. While the concern is appreciated and may be understandable, it is in fact our current opt-in system that could result in some being unnecessarily removed.³

By moving to an opt-out system of AVR, this potential trigger for immigrants to become unwittingly entrapped into committing a violation of immigration law would be neutralized.

For all these reasons, the ACLU of Hawai‘i supports HB322 HD2 and we encourage the committee to advance the measure.

Sincerely,

Josh Frost

Josh Frost
Policy Advocate
ACLU of Hawai‘i
jfrost@acluhawaii.org

With more than 4,000 Hawaii-based members, the mission of the American Civil Liberties Union of Hawai‘i is to protect the fundamental freedoms enshrined in the United States and Hawai‘i State Constitutions through legislative, litigation, and public education work. The ACLU of Hawai‘i is a non-partisan and private non-profit organization that provides its services at no cost to the public and does not accept government funds. The ACLU of Hawai‘i has been serving our communities in Hawai‘i for over 60 years.

² Brennan Center for Justice. *Automatic Voter Registration, a Summary*. Updated October 26, 2023. <https://www.brennancenter.org/our-work/research-reports/automatic-voter-registration-summary>.

³ Any noncitizen who falsely represents himself or herself to be a citizen of the United States for any purpose or benefit under immigration laws or any state or federal law is removable. INA § 237(a)(3)(D)(i), 8 U.S.C. § 1227(a)(3)(D)(i).

LATE

Responsive GOV ACTION

March 17, 2026

Re: Letter of Support for HB 322

Dear Chair McKelvey and Members of the Committee:

Responsive Gov Action is a non-partisan organization that works to identify and promote practical solutions that make government more efficient, accessible, and responsive to residents. We write this letter in strong support of HB 322.

Despite improvements in Hawaii's election laws in recent years, there are still roughly 200,000 eligible but unregistered U.S. citizens in the state. Put another way, roughly 20% of Hawaii's eligible voter population is not currently registered. With this bill, Hawaii has the opportunity to add eligible voters to the rolls in a streamlined way using a system that has been adopted by 11 other states and Washington, D.C.

Specifically, the bill would authorize the "examiner of drivers" and state agencies designated by the Office of Elections to transmit voter registration information to county clerks in order to automatically and securely register people to vote if they have already presented all of the information needed to verify their voter eligibility—namely, proof of citizenship, age, and address. This would mean, for example, that someone applying for a Real ID at a Driver Licensing Center who presents a U.S. birth certificate, U.S. citizen passport, or naturalization certificate—and who is of sufficient age to register or pre-register to vote—would be automatically sent to the county clerk for voter registration. They would be given an opportunity to decline registration through a post-transaction mailer, but they would not have to take any additional steps to be added to the voter rolls.

This bill also contains vital safeguards for non-citizens. Under the bill, if someone presents proof of non-citizenship—like a green card—during their transaction, they will not be asked whether they want to register to vote. This ensures that someone who is limited English proficient or just in a rush will not accidentally attempt to register to vote. This protects the individual from the severe criminal and immigration consequences that could result from a false attestation of citizenship.

Also importantly, the bill automates address updates for those who are already registered—so if someone goes into a Driver Licensing Center or updates their address

online, their voter registration address is updated automatically. This will ensure vital election mail—including mail-in ballots—are sent to the right address.

Beyond these systemic improvements, HB 322 streamlines agency transactions by reducing the number of questions about voter registration that government agencies must ask applicants. Shorter transactions reduce lines and improve overall taxpayer satisfaction, and by extension contribute to significant time and cost savings for the State.

Our analysis of HB 322 indicates that Hawaii would see a net savings of approximately \$309,077 in the first year of implementation, even after accounting for up-front costs. Building on that initial return, we estimate that Hawaii can expect an ongoing net savings of roughly \$626,587 in off-years and \$1,363,907 in election years once HB 322 is fully implemented. By registering voters and updating registrations during state agency transactions, this system reduces time spent manually processing paper forms, decreases undeliverable mail, and mitigates registration issues on Election Day—cutting unnecessary costs for election officials and taxpayers alike.

These changes also relieve the significant burden election officials face in processing paper voter registration applications and address updates and reduce the number of undeliverable mail ballots, saving election officials time. When Massachusetts implemented this system, it saw a 45% reduction in paper voter registration forms, and when Delaware adopted this system, it saw a 91% reduction in paper voter registration forms.¹

This bill improves voter access and election security by registering eligible voters, making it easier to vote by mail, protecting non-citizens, reducing burdens on election officials, and saving taxpayer money. This is why eleven other states and Washington, D.C. have already adopted this system, and it has become the gold standard for automatic voter registration. We strongly encourage the committee to support it.

For more information or any questions, we can be reached at info@responsivegovaction.org.

¹ Comparison of the number of paper-based forms received in 2020 against the number of paper-based forms received in 2024. U.S. Election Assistance Comm.: EAVS Data Interactive: EAVS Voter Registration 2 - Source of Registration Transactions (Jan. 13, 2026), <https://www.eac.gov/research-and-data/studies-and-reports/eavs-data-interactive>.

LATE

HB-322-HD-2

Submitted on: 3/16/2026 3:26:14 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Ralph Cushnie	Individual	Oppose	Remotely Via Zoom

Comments:

Chair and Members of the Committee,

Thank you for the opportunity to testify. I respectfully oppose HB 322.

The premise of this bill is that automatic voter registration will increase Hawai'i's historically low voter participation rates. But the real issue in Hawai'i is not registration—it is confidence in the system.

Hawai'i already has very high voter registration rates. Most eligible residents are already on the voter rolls. The problem is that many of them simply choose not to participate. Automatically adding more names to the voter rolls will not solve that problem.

HB 322 would require that individuals applying for instruction permits, driver's licenses, or identification cards be automatically registered to vote unless they opt out. That will increase the size of the voter rolls, but it does not address why voters are disengaged.

It also creates another concern. When voter rolls grow to include large numbers of inactive or unlikely voters, those unused voter records create opportunities for ballots to be attributed to people who never voted.

In a system where basic controls are weak—such as incomplete chain-of-custody documentation, unreconciled envelope counts, and signature verification conducted internally without witnesses—the risk is that ballots can be added electronically to the system without being tied to a verifiable physical envelope.

Election integrity depends on simple inventory control: the number of ballots counted should always match the number of envelopes physically received.

Expanding the voter rolls while those controls remain unresolved increases the vulnerability of the system and further undermines public confidence.

If the goal is to increase participation, the Legislature should focus on strengthening transparency, verification, and accountability in the election process. When voters trust the system, they show up to vote.

Confidence in elections increases participation. Expanding registration alone does not.

For these reasons, I respectfully urge the committee to reject HB 322.

Sincerely,

Ralph Cushnie

Elections Commissioner

LATE

HB-322-HD-2

Submitted on: 3/16/2026 5:08:02 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Von Kaanaana	Individual	Support	Written Testimony Only

Comments:

As a constituent of the committee I urge the committee to support HB 322.

The state of Hawai'i has an outright obligation to remove tangible barriers within the limits of its power. Certified voting is the logical solution to codify election integrity. Your constituents pay attention to 'how we vote' creating barriers to that by not taking the initiative will be remembered.

Hawai'i leads the world in its pursuit of a society with an abundance mindset. This is one more step towards that goal.



HB-322-HD-2

Submitted on: 3/16/2026 10:06:48 PM

Testimony for GVO on 3/17/2026 3:05:00 PM

Submitted By	Organization	Testifier Position	Testify
Doug Pasnik	Individual	Oppose	Remotely Via Zoom

Comments:

I submit this written testimony in opposition to HB 322 HD2.

At its core, this measure expands Automatic Voter Registration (AVR) in a manner that increases system inputs without first resolving foundational concerns related to voter roll accuracy, auditability, and inter-agency accountability.

1. Divergence Between Population and Voter Roll Growth

Over approximately the past decade, Hawai‘i’s total population has remained relatively stable, increasing by roughly 1%. During that same period, registered voters increased by nearly 154,000 individuals, representing approximately 22% growth.

This divergence is a signal that warrants closer examination of list maintenance practices, data reconciliation processes, and record accuracy over time.

Before expanding automatic inputs into the voter registration system, it would be prudent to ensure that the existing voter rolls are fully reconciled, current, and verifiably accurate.

2. ERIC Participation and Ongoing Growth Trends

In 2023, Hawai‘i paid to join the Electronic Registration Information Center (ERIC), a multi-state data-sharing system designed to improve voter roll accuracy by identifying duplicate registrations, out-of-state movers, and deceased individuals.

At the time, it was represented that participation in ERIC would enhance voter roll maintenance and improve the integrity of the statewide voter file.

Given that objective, the continued growth in registered voters at a rate significantly exceeding population change raises a governance question:
To what extent are ERIC-derived maintenance processes being fully implemented, and how are the results being measured and reported?

This bill does not address that question, nor does it establish reporting or audit requirements tied to ERIC performance outcomes.

3. Expansion of Data Inputs and Inter-Agency Complexity

HB 322 expands AVR beyond driver licensing transactions and authorizes the designation of additional state agencies as sources of voter registration data.

From an operational standpoint, this introduces:

- Additional data pipelines into the voter registration system
- Increased reliance on upstream data quality and consistency
- Greater complexity in identity matching, record updating, and duplicate prevention

As the number of participating agencies increases, so too does the need for clearly defined accountability:

- Which agency is responsible for data accuracy at the point of transmission?
- What standards govern data validation prior to submission?
- How are discrepancies between agency records resolved?

The bill does not establish a comprehensive inter-agency accountability or audit framework to address these questions.

4. Opt-Out Structure and Affirmative Intent

The bill relies on a notice-and-opt-out model, whereby individuals are registered or updated unless they decline within a specified period.

While administratively efficient, this approach:

- Reduces reliance on affirmative voter intent
- Increases the likelihood of unintended or unverified record creation or modification
- Shifts the burden of correction to the individual rather than the system

From a governance standpoint, systems that depend on passive consent require stronger audit and verification controls — which are not fully developed in this measure.

5. Transparency and Timely Oversight

HB 322 includes a temporary restriction on public access to records created through the AVR process.

Although this may be intended to protect sensitive information, it also limits timely external review during the period when records are first introduced or modified.

Transparency at the point of entry is a critical component of public trust and system integrity. Any limitation on access should be carefully balanced with the need for independent oversight.

6. Governance Consideration

The central issue presented by this bill is not whether voter registration should be accessible — but whether system expansion is occurring in parallel with sufficient controls to ensure accuracy, accountability, and transparency.

A more measured approach would be to:

- Strengthen voter roll maintenance and reconciliation processes
- Establish clear inter-agency data standards and accountability
- Implement audit and reporting requirements, including ERIC performance metrics
- Ensure transparency mechanisms are preserved at all stages of record creation and update

Only after these foundational elements are in place should further expansion of automatic registration systems be considered.

Conclusion

Strong public systems are not defined solely by efficiency, but by their ability to produce accurate, verifiable, and trusted outcomes.

For these reasons, I respectfully urge the Committee to defer HB 322 HD2 or amend it to include enhanced safeguards for auditability, inter-agency accountability, and transparency.