



December 12, 2025

Mr. Matthew Ramsey
Head of Privacy and Disclosure Policy
Social Security Administration
Room G-401 West High Rise
6401 Security Boulevard
Baltimore, Maryland 21235-6401

Submitted electronically via regulations.gov
Re: Privacy Act of 1974; System of Records
Docket Number: SSA-2025-0225

Dear Mr. Ramsey:

On behalf of the undersigned state and local Leagues of Women Voters (“the League”), we write in response to the Social Security Administration’s (SSA) proposal to modify an existing system of records notice (SORN) titled, “Master Files of Social Security Number (SSN) Holders and SSN Applications (60-0058),” (90 FR 50879). The League urges SSA to rescind the proposal to add a new routine that will allow SSA data to be disclosed to the Department of Homeland Security (DHS) for use by the US Citizenship and Immigration Service (USCIS).

The League is a nonprofit membership organization whose mission is to empower voters and defend democracy. The League is nonpartisan—neither supporting nor opposing candidates or political parties at any level of government—and is committed to protecting citizens’ right to vote. State and local Leagues nationwide provide voter outreach, education, and assistance to all eligible voters, including naturalized citizens. The League seeks to educate the public, our members, and eligible naturalized citizen voters about the risks of using SSA data to verify citizenship within the overhauled SAVE system and how to mitigate them. Leagues across the country also provide voter registration to naturalized citizens and have naturalized citizens among their members.

The League believes that voting is a fundamental right of citizenship that must be guaranteed. The League also believes that democratic government depends on informed and active participation and requires that governmental bodies protect the citizen’s right to know by giving adequate notice of proposed actions, among other methods of transparency.

We fundamentally disagree with SSA’s disclosure of data to DHS for its implementation of an expanded SAVE system. Federal law protects all American citizens and lawful residents from improper government use of their data. After months of DHS using the expanded SAVE system, including SSA data, without legally required transparency or public input, the League writes

with concerns about the utility, legality, and tangible impact of expanding the SAVE system as proposed.

Based on the recent USCIS SORN titled, “Department of Homeland Security/U.S. Citizenship and Immigration Services (USCIS)-004 Systematic Alien Verification for Entitlements Program (SAVE),” (90 FR 48948), the data SSA is contemplating disclosing to DHS will likely be used in the expanded SAVE system.

The Administration has already transformed the DHS SAVE system into a national citizenship data bank, pooling data from numerous federal agencies. As set out in this SORN, SSA citizenship data, that is known to be unreliable, has been disclosed to DHS’s SAVE system. SSA’s citizenship data is especially unreliable for naturalized citizens because their citizenship information changes over time, and the only citizenship data SSA collects is provided by the individual at a single moment in time—when someone applies for an SSN and the corresponding card. SSA has no process for automatically updating the citizenship data it maintains but rather relies on SSN-holders to inform SSA of any change in their status. Correcting data with SSA via in-person appointment is burdensome and complicated by diminished services due to the Administration’s widespread reductions in force, including at SSA. Although both SSA and DHS have long known of the limitations of SSA’s citizenship data and the challenges associated with integrating that data into DHS’s systems,¹ the revised SAVE SORN acknowledges none of these well-documented issues. Similarly, the SSA SORN does not mention issues with sharing SSA data with USCIS. Troublingly, the SAVE system is currently being used by several states to purge voter rolls and open criminal investigations.

Despite DHS having made the changes months ago, the revised SAVE SORN belatedly notifies the public that the SAVE system now integrates the SSA’s “Master Files of Social Security Number Holders and Social Security Number Applications, February 20, 2025 (90 FR 10025),” and includes a new “Routine Use L” to support sharing information with SSA for purposes of enabling SAVE user agencies to make citizenship determinations.

The revised SSA SORN at issue, published on November 11, 2025, describes the new routine, “Routine Uses of Records Maintained in the System” Number 49 as SSA disclosing data “[t]o DHS, information regarding the citizenship and immigration status, lawful or unlawful, of any individual pursuant to 8 U.S.C. 1373(a).”

This new multi-agency data pooling arrangement is unlawful. No statute authorizes DHS to conduct bulk matching and pooling of SSA data with data provided by SAVE user agencies and data housed in DHS systems. While both revised SORNs cite 8 U.S.C. § 1373 as authority, the U.S. Department of Justice has long interpreted that statute not as providing any “affirmative

¹ See Letter from SSA Off. of Gen. Counsel to Fair Elections Ctr. 2 (July 13, 2023), <https://fairelectionscenter.org/wp-content/uploads/2025/07/SSA-Touhy-Decision-letter.July-13-2023-signed.pdf>; Westat Report to DHS, Evaluation of the Accuracy of E-Verify Findings, at 29, 34, 51, A-4 (July 2012), <https://www.e-verify.gov/sites/default/files/everify/data/FindingsEVerifyAccuracyEval2012.pdf>.

authority,” but rather as a “limitation on the authority of government entities or officials to impose prohibitions or restrictions on disclosures by government entities or officials.”² Neither § 1373 nor any other federal law authorizes DHS’s expanded SAVE system.

Use of this expanded SAVE system is not only unlawful but will also lead to naturalized citizens being wrongly targeted, investigated, forced to needlessly provide documentary proof of citizenship, and unlawfully purged from voter rolls due to data mismatches, user error, and inaccurate records. The massive increase in the number of voters at risk due to SAVE’s new bulk upload and search-by-SSN functions (including either full or partial (last 4) SSNs)) exponentially increases the risks of error and harm to the millions of voters whom the League serves. The overhauled SAVE system utilizes unreliable SSA citizenship data to verify voter eligibility and repurposes Americans’ SSA data unfairly, without prior notice or consent.

DHS itself has admitted in a Privacy Impact Assessment for the expanded SAVE system that “due to misspelling of names, transposed numbers, or incomplete information, the SAVE Program may produce inaccurate results,” and that these risks cannot be fully mitigated because DHS “does not have direct access to the Social Security Administration system to support” additional verification steps, and SAVE user agencies “may not go through all steps to ensure accuracy of information.”³ Moreover, in October of 2024, DHS acknowledged “the very serious consequences of the results produced by SAVE and its import in ensuring the right to vote for U.S. citizens.”⁴ DHS failed to sufficiently consider and account for these risks to eligible voters prior to expanding the SAVE system.

SAVE’s additional verification procedures contemplate that individuals whom SAVE identifies as potential non-citizens may need to provide documentary proof of citizenship to avoid being purged from voter rolls. While DHS views this as a risk-mitigation measure, DHS fails to recognize that forcing eligible registered voters to re-prove their citizenship status itself burdens the fundamental right to vote and risks disenfranchising eligible voters. In addition to these risks, the overhauled system puts voters at risk from unwarranted criminal investigations of suspected noncitizen voting.

The League’s mission is to empower voters and defend democracy. Intimidating voters through threats to purge voter registration or even target voters for criminal prosecution severely

² Dep’t of Justice, Office of Legal Counsel, *Relationship Between Illegal Immigr. Reform & Immigrant Resp. Act of 1996 & Statutory Requirement for Confidentiality of Census Info.*, at 6 (May 18, 1999), <https://www.justice.gov/opinion/file/844106/dl?inline=>.

³ Privacy Impact Assessment for the SAVE Program, DHS Reference No. DHS/USCIS/PIA-006(d) (Oct. 31, 2025), <https://www.dhs.gov/sites/default/files/2025-10/privacy-pia-dhsuscis006d-save-october2025%20%28002%29.pdf>.

⁴ USCIS, Letter from USCIS Director to Ohio Sec’y of State (Oct. 10, 2024), <https://perma.cc/8SN3-C88W>.

weakens our democracy by chilling participation. Distressingly, the Administration's efforts disproportionately target historically disenfranchised communities, including communities of color and new Americans. When voters are wrongly purged from voter rolls it decreases the number of voters, directly undermining the League's mission of increasing the number of registered voters and voter participation. When voters are intimidated or must take additional steps to register or remain registered, this impedes the League's mission of ensuring that the ballot box is accessible for all eligible voters.

The League urges SSA to reject this proposal to modify its routines to share SSA data with DHS and its SAVE system. SSA, DHS, and fellow agencies do not have the statutory authority to create such a multi-agency data pool, and SSA has failed to sufficiently consider the risks to eligible voters in disclosing personal SSA data to DHS for implementing the expanded system.

The League looks forward to working with SSA to ensure that eligible American citizens can exercise their fundamental right to vote without fear and be safe in the knowledge that the government is not abusing their private data.

Respectfully submitted,

State Leagues

League of Women Voters of Alaska
League of Women Voters of Alabama
League of Women Voters of Arkansas
League of Women Voters of Arizona
League of Women Voters of California
League of Women Voters of Colorado
League of Women Voters of Connecticut
League of Women Voters of the District of Columbia
League of Women Voters of Delaware
League of Women Voters of Florida
League of Women Voters of Georgia
League of Women Voters of Hawaii
League of Women Voters of Iowa
League of Women Voters of Idaho
League of Women Voters of Indiana
League of Women Voters of Massachusetts
League of Women Voters of Maryland
League of Women Voters of Maine
League of Women Voters of Michigan
League of Women Voters of Minnesota
League of Women Voters of Missouri
League of Women Voters of Montana
League of Women Voters of North Carolina

League of Women Voters of Nebraska
League of Women Voters of New Hampshire
League of Women Voters of New Jersey
League of Women Voters of New Mexico
League of Women Voters of Nevada
League of Women Voters of Ohio
League of Women Voters of Oklahoma
League of Women Voters of Pennsylvania
League of Women Voters of Rhode Island
League of Women Voters of South Carolina
League of Women Voters of South Dakota
League of Women Voters of Tennessee
League of Women Voters of Utah
League of Women Voters of Washington State
League of Women Voters of West Virginia
League of Women Voters of Wyoming

Local Leagues

Alaska

League of Women Voters of Juneau

Arizona

League of Women Voters of Northern Arizona
League of Women Voters of Northwest Maricopa County

California

League of Women Voters of Diablo Valley
League of Women Voters of Marin County
League of Women Voters of Orange Coast
League of Women Voters of Redding Area
League of Women Voters of San Luis Obispo County

Connecticut

League of Women Voters of Greater Hartford
League of Women Voters of Hamden/ North Haven
League of Women Voters of Litchfield County
League of Women Voters of New Britain Area
League of Women Voters of Stamford
League of Women Voters of the Bridgeport Area

Florida

League of Women Voters of Alachua County
League of Women Voters of Broward County
League of Women Voters of Jacksonville First Coast
League of Women Voters of Lee County, Inc.
League of Women Voters of Martin County
League of Women Voters of Sanibel

League of Women Voters of Sarasota County
League of Women Voters of Seminole
League of Women Voters of the Upper Keys
League of Women Voters of The Villages / Tri-County
League of Women Voters of Volusia County

Hawaii

League of Women Voters of Honolulu

Iowa

League of Women Voters of Ames and Story County
League of Women Voters of Grinnell-Jasper

Illinois

League of Women Voters of Arlington Heights - Mount Prospect - Buffalo Grove Area
League of Women Voters of Champaign County
League of Women Voters of Cook County
League of Women Voters of Deerfield/Lincolnshire
League of Women Voters of Downers Grove, Woodridge, Lisle
League of Women Voters of Glen Ellyn
League of Women Voters of Glenview and Glencoe
League of Women Voters of Highland Park-Highwood
League of Women Voters of Homewood-Flossmoor Area
League of Women Voters of Lake Forest Lake Bluff
League of Women Voters of Metro St. Louis
League of Women Voters of Naperville
League of Women Voters of Oak Park/River Forest
League of Women Voters of Palos Orland
League of Women Voters of Roselle-Bloomington Area
League of Women Voters of the Palatine, Barrington and Schaumburg Areas
League of Women Voters of Wheaton
League of Women Voters of Winnetka-Northfield-Kenilworth

Indiana

League of Women Voters of Bloomington-Monroe County
League of Women Voters of Brown County
League of Women Voters of Fort Wayne
League of Women Voters of Greater Lafayette
League of Women Voters of Henry County
League of Women Voters of Howard County Area
League of Women Voters of Indianapolis
League of Women Voters of Johnson County
League of Women Voters of Muncie-Delaware County
League of Women Voters of Southern Indiana
League of Women Voters of the Calumet Area
League of Women Voters of the South Bend Area
League of Women Voters of Vigo County

Kansas

League of Women Voters of Emporia
League of Women Voters of Great Bend

Louisiana

League of Women Voters of Iberia

Massachusetts

League of Women Voters of Falmouth
League of Women Voters of the Cape Cod Area
League of Women Voters of the Northampton Area

Maryland

League of Women Voters of Anne Arundel County
League of Women Voters of Carroll County
League of Women Voters of Montgomery County
League of Women Voters of Queen Anne's County

Michigan

League of Women Voters of Marquette County
League of Women Voters of Oakland Area
League of Women Voters of the Lansing Area

Minnesota

League of Women Voters of Anoka, Blaine, Coon Rapids Area
League of Women Voters of Detroit Lakes Area
League of Women Voters of Duluth
League of Women Voters of Edina
League of Women Voters of Golden Valley
League of Women Voters of Lake Minnetonka Plymouth Area
League of Women Voters of Mankato Area
League of Women Voters of Minneapolis
League of Women Voters of New Brighton Area
League of Women Voters of New Hope Area
League of Women Voters of New Ulm
League of Women Voters of Park Rapids Area
League of Women Voters of Roseville Area
League of Women Voters of the Willmar Area
League of Women Voters of White Bear Lake Area

Montana

League of Women Voters of Billings
League of Women Voters of Missoula

North Carolina

League of Women Voters of Asheville-Buncombe County
League of Women Voters of Carteret County
League of Women Voters of Catawba Valley
League of Women Voters of Charlotte Mecklenburg
League of Women Voters of Dare County
League of Women Voters of Henderson County
League of Women Voters of Lower Cape Fear

League of Women Voters of Moore County
League of Women Voters of Orange Durham and Chatham Counties
League of Women Voters of the Piedmont Triad

North Dakota

League of Women Voters of Plum Valley

Nebraska

League of Women Voters of Lincoln-Lancaster County

New Jersey

League of Women Voters of the Montclair Area

New York

League of Women Voters of Albany County
League of Women Voters of Buffalo/ Niagara
League of Women Voters of Cortland County
League of Women Voters of St. Lawrence County
League of Women Voters of Steuben and Chemung Counties
League of Women Voters of the Hamptons, Shelter Island and the North Fork
League of Women Voters of the Mid-Hudson Region
League of Women Voters of Utica Rome Metropolitan Area

Ohio

League of Women Voters of Akron Area
League of Women Voters of Perrysburg Area

Oregon

League of Women Voters of Coos County
League of Women Voters of Portland

Pennsylvania

League of Women Voters of Berks County

South Carolina

League of Women Voters of Florence Area

Texas

League of Women Voters of Amarillo
League of Women Voters of Collin County
League of Women Voters of Cy-Fair
League of Women Voters of Galveston
League of Women Voters of Irving
League of Women Voters of the Austin Area
League of Women Voters of the Bay Area
League of Women Voters of the San Antonio Area
League of Women Voters of Williamson County

Utah

League of Women Voters of Davis County

Virginia

League of Women Voters of Prince William-Fauquier Area

Washington

League of Women Voters of Bellingham/Whatcom County

League of Women Voters of Clark County
League of Women Voters of Jefferson County

Wisconsin

League of Women Voters of Ozaukee & Washington Counties

Wyoming

League of Women Voters of Fremont County