LEAGUE OF WOMEN VOTERS® OF THE UNITED STATES

November 6th, 2026

Department of Defense
Office of the Under Secretary of Defense for Personnel and Readiness
c/o Office of the Director of Administration and Management
Oversight and Compliance Directorate, Regulatory Division
4800 Mark Center Drive, Mailbox #24, Suite 05F16
Alexandria, VA 22350-1700

**Re: Proposed Collection; Comment Request — Federal Post Card Application (FPCA); SF76; OMB Control Number 0704-0503; Docket ID: DOD-2026-OS-1982**

Dear Secretary Hegseth,

The League of Women Voters of the United States ("the League") appreciates the opportunity to comment on the Department of Defense's (the Department) 60-day information collection notice concerning the Federal Post Card Application (FPCA). We strongly oppose the recent FPCA changes that remove the classification for eligible US citizens who have never resided in the United States and create additional confusion regarding identification requirements. **These changes threaten to disenfranchise eligible overseas voters, create unnecessary administrative barriers, and undermine the very reason the *Uniformed and Overseas Citizens Absentee Voting Act* (UOCAVA) was established.**

The League is a 106-year-old nonpartisan nonprofit committed to ensuring that everyone is represented in our democracy. We are a grassroots organization comprised of over one million members and supporters in all 50 states and the District of Columbia across more than 800 local and state Leagues. The League focuses on advocacy, education, litigation, and organizing to advance our mission of empowering voters and defending democracy. We base our work on policy positions developed from member study and agreement among League membership to ensure our advocacy reflects best practices and a nationwide perspective.

In late August 2026, the Department sought emergency approval to revise the FPCA by removing the option for US citizens who have not yet lived in the United States to identify themselves on the form and changing the questions regarding voter identification. The Department implemented these changes in the immediate runup to the November 2026 election, which required bypassing the standard public comment process. We believe these changes are confusing to voters, creating uncertainty about how to complete the form accurately, what identification information they must provide, or whether they can register in the first place.

**<u>The League's Concern with the Proposed Changes to Overseas Voting</u>**

The FPCA is supposed to make it easier for Americans living overseas to register to vote and request an absentee ballot. The Department's changes make that process even more difficult for Americans who already face challenges casting their ballots. The League has three primary concerns with these changes:

1. **The executive branch has no role in determining who qualifies to vote in each state, and Congress specifically passed UOCAVA to ensure that all eligible US citizens abroad had a process to cast their ballot.** We believe the Department should restore an explicit response option for citizens who have not yet lived in the United States and direct them to applicable state requirements. Removing this classification from the FPCA could leave eligible overseas voters unsure of their voting eligibility and risk disenfranchising them altogether.
2. **Last-minute changes to voter registration forms harm *all* voters, particularly overseas voters.** Overseas voters already have to navigate different state registration requirements, international mail delays, and limited access to voting assistance. Changing the forms immediately before an election gives voters even less time to understand what they need to do and increases the likelihood that eligible voters will be unable to cast their ballots. Many overseas voters will have already submitted their FCPA before these changes, and the changes do not affect eligibility.
3. **Election officials and other stakeholders should have been allowed to provide input about the efficacy of the changes to the UOCAVA forms *before* the changes were made, not after.** UOCAVA explicitly requires consultation with state and local election officials. A post-implementation comment period is not an adequate substitute for timely, substantive consultation. If the Department had worked with election officials before making changes, it could have identified problems with the forms before putting them into use. This is especially important in the immediate runup to an election, when voters and election officials have little time to adjust to administrative changes.

Additionally, the changes to the FPCA may create confusion for US citizens whose families have spent years overseas in service to the United States. This may include adult children of members of the US Armed Forces, Foreign Service officers, diplomats, and other US personnel who were born or raised abroad and have not yet resided in the United States.

For these Americans, the fact that they have not yet established residence in the United States could be a consequence of their family's overseas service. The prior FPCA gave US citizens living abroad who had “never lived in the United States” a specific way to identify their circumstances. The revised form removes that classification. It is particularly troubling that a citizen whose connection to living overseas stems from a parent's service to the United States could encounter a federal voting form that no longer clearly recognizes their circumstances. Notably, the change to the form itself does not change the underlying laws determining whether these citizens are eligible to vote.

**The League urges the Department to reverse these changes to the FPCA, restore the eligibility classification for US citizens who have not yet resided in the United States, and ensure that any future changes to voting are made in consultation with state and local election officials through the standard public comment process.** Americans living overseas should be able to rely on federal voting forms to facilitate, not hinder, their participation in federal elections, accurately reflect their eligibility, and provide clear instructions for registering and requesting their ballots. The Department has a responsibility to help eligible overseas voters exercise their right to vote.

With a nationwide membership and longstanding expertise in democracy and public policy, the League of Women Voters is a trusted, nonpartisan resource and stands ready to engage further. For additional engagement, please contact Jessica Jones Capparell, Director of Government Affairs, at JJones@lwv.org, or Kristen Kern, Federal Policy and Advocacy Manager, at KKern@lwv.org.