



United States
Conference of
Catholic Bishops

Office of the
General Counsel

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Submitted Electronically

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U.S. Election Assistance Commission
Attn: Camden Kelliher, General Counsel
633 3rd Street NW, Suite 200
Washington, DC 20001
ckelliher@eac.gov

Dear Mr. Kelliher:

On behalf of the United States Conference of Catholic Bishops (USCCB) we respectfully submit the following comments on the Petition of America First Legal Foundation (AFL) for Rulemaking Before the Election Assistance Commission, issued August 21, 2025 (“AFL Petition” or “Petition”).¹ The Petition proposes the Election Assistance Commission (EAC) amend 11 C.F.R. § 9428.4 and the federal voter registration form to require Documentary Proof of Citizenship (DPOC).

Pope Leo XIV recently emphasized, “[r]eligion ... cannot be limited to the private sphere, as if believers had no business making their voice heard with regard to problems affecting civil society and issues of concern to its members.”² As Pope Leo XIV instructs us, the USCCB expresses its concerns about ensuring eligible voters are able to vote and maintaining election integrity for a democratic and just civil society.

While USCCB does not take a position on what methods should be implemented in facilitating these values of the right to vote and election integrity, USCCB would like to draw the EAC’s attention to special considerations of eligible voters, such as the poor, vulnerable, and historically disenfranchised groups, in light of the proposed changes from AFL.

USCCB and the Catholic Perspective on Voting Rights

Protecting voting rights is a moral imperative for the common good of a just society. Catholic teaching instructs “responsible citizenship is a virtue, and participation in political life is a moral obligation.”³ In considering these fundamental principles, participation in political life is an essential duty for every Catholic and all people of good will. The right to vote is a human right, and it flows from

¹ *Petition of America First Legal Foundation (AFL) for Rulemaking Before the Election Assistance Commission*, 90 FR 40,825 (Aug. 21, 2025).

² *Dilexi Te*, Apostolic Exhortation of Pope Leo XIV (Vatican, Oct. 4 2025) at § 112, available online: <https://tinyurl.com/mswzp9k2>.

³ *Forming Consciences for Faithful Citizenship: A Call to Political Responsibility from the Catholic Bishops of the United States* at 7 <https://tinyurl.com/4wmdsp92>.



the inherent dignity of each citizen.⁴

The USCCB has remained steadfast in its commitment to advocating for eligible Americans to exercise their right to vote. The National Catholic Welfare Conference, USCCB's predecessor organization, publicly supported the Voting Rights Act in 1965 (in addition to other civil rights legislation). Then Associate Director of NCWC's Social Action Department, Fr. John Cronin, testified on behalf of NCWC to the House Judiciary Committee supporting the Act. Fr. Cronin urged the Committee that "[t]he right to vote is a human right which is guaranteed by the basic law of the land," and that, together with other religious bodies, "no voting qualifications or procedure shall be imposed or applied to deny or abridge the right to vote on the account of race or color."⁵

More recently, USCCB continues to offer its guidance and expertise on the topic of voting rights and participation in political life to the U.S. Supreme Court, legislators, federal agencies, and public decisionmakers. For example, in subsequent attacks on the VRA, such as the landmark Supreme Court decision, *Shelby County v. Holder*, 570 U.S. 529 (2013), the USCCB was vocal and advocated for legislative action to ensure no one who is eligible is denied the right to vote.⁶

Considerations for the AFL Petition

As a longstanding supporter of the VRA, the USCCB is now prompted to provide critical considerations on AFL's Petition. To reiterate, participation in political life is a right and moral obligation flowing from the inherent human dignity in all people. "[U]njust discrimination, whether based on race, religion, sex, ethnicity, disabling condition, or age...are grave injustices and affronts to human dignity."⁷ While the AFL Petition does not propose explicitly unjust discrimination in voting practices, if the Petition is adopted, it may result in the suppression of certain voters. This morphs into unjust discrimination, which is intolerable for the common good and a just society.

The AFL Petition suggests the use of DPOC may be a tool to enhance election integrity, but it will have tangible consequences for those on the margins of our society such as the poor, elderly, disabled, ill, homeless, and people who have been historically disenfranchised from the right to vote, such as people of color. This method in securing elections ultimately creates barriers to registration and obtaining proof of citizenship, even for citizens, and will prove challenging for those who do not have or cannot afford a driver's license, passport, or other DPOC. Obtaining new and acceptable DPOC will place stress on voters who do not have the availability, physical ability, or financial resources to acquire DPOC in advance of election day. Barriers to voting are also exacerbated in rural areas and among Native American populations, as many may be without government issued identification that can serve as or is needed for acceptable DPOC.

As we recognized in *Forming Consciences for Faithful Citizenship*, "[i]t is important for our

⁴ Bishops Stephen E. Blaire and Daniel E. Flores, "On Supreme Court Decision on Voting Rights: 'Participation in Political Life Is A Right and Moral Obligation' State U.S. Bishops," USCCB (July 3, 2013), available online: <https://tinyurl.com/ym2kr4hu>.

⁵ Rev. John F. Cronin, Testimony on Voting Rights Act before House Judiciary Committee (March 25, 1965), available online: <https://tinyurl.com/43z577rm>.

⁶ *Supra* note 4.

⁷ *Supra* note 3, at 35.



society to continue to combat any unjust discrimination” and in particular, “[w]here the effects of past discrimination persist, society has the obligation to take positive steps to overcome the legacy of injustice, including vigorous action” and, among other things, to give special protection and consideration to the voting rights for people on the margins.⁸ Every voter’s voice is essential to advancing the common good in our country. USSCB respectfully requests the EAC take under consideration the impacts AFL’s Petition has on *all* Americans and strike a balance between the shared priorities of preserving voting rights and free and fair elections.

Respectfully submitted,

William Quinn
General Counsel

Shannon Eckman
Solicitor & Assistant General Counsel

⁸ *Supra* note 3, at 35, 36.