

PRE-DECISIONAL/DELIBERATIVE

U.S. Department of Homeland Security  
U.S. Citizenship and Immigration Services  
Office of the Director  
Camp Springs, MD 20588-0009



U.S. Citizenship  
and Immigration  
Services

June 8, 2026

## MEMORANDUM FOR THE SECRETARY

FROM: Joseph B. Edlow **JOSEPH B EDLOW** Digitally signed by  
Director JOSEPH B EDLOW Date: 2026.06.08  
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SUBJECT: **Executive Order 14399 Implementation**

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**Purpose:** This memorandum rescinds and supersedes a previous Memorandum for the Secretary, dated June 1, 2026, because that memorandum did not accurately reflect the current policy of the Administration. This memorandum seeks your approval regarding a course of action for U.S. Citizenship and Immigration Services (USCIS) that relates to implementing Section 2(a) of Executive Order (EO) 14399, "Ensuring Citizenship Verification and Integrity in Federal Elections." Utilizing existing Department of Homeland Security (DHS) statutory authority, the proposed approach is designed to leverage existing capabilities and legal authorities, operate within current privacy and security frameworks, and advance EO 14399's directive that DHS compile, maintain, and transmit State Citizenship Lists. USCIS seeks to establish a technological method to provide state election officials access to citizenship list information under the control of USCIS, the Social Security Administration (SSA), and the Department of State (DOS). USCIS is on track to deliver the core technological infrastructure required for state access on or around June 30, 2026, and USCIS is working to support direct sharing of citizenship list information with the States.

Separately, USCIS is exploring an appropriate method of coordination with USPS, consistent with applicable laws and depending on the development of pending rulemaking processes, related to mail-in and absentee ballots.

**Background:** EO 14399 directs the Secretary of Homeland Security, through the Director of USCIS and in coordination with the Commissioner of the SSA, to take appropriate action to compile and transmit no fewer than 60 days before each regularly scheduled Federal election, or promptly upon request by a State in connection with any special Federal election, to the chief election official of each State a list of individuals confirmed to be United States citizens who will be above the age of 18 at the time of an upcoming Federal election and who maintain a residence in the subject State (the "State Citizenship List"). This is designed to assist States in safeguarding

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election integrity. The order further specifies that this must be done to the extent feasible and consistent with applicable law, including but not limited to the Privacy Act of 1974 (5 U.S.C. § 552a).

To support this effort, the DHS Office of Strategy, Policy & Plans has identified the following four outcomes:

1. Establishing infrastructure to compile and transmit State Citizenship lists.
2. Defining a process for States to obtain the information in these lists.
3. Designating a single DHS point of contact for State Citizenship List-related requests.
4. Creating mechanism for individual citizens to view records and submit corrections.

The overall solution should establish the operational infrastructure on or around June 30, 2026, and define a viable path to creating a citizen-facing access portal for delivery at a later date, while remaining within existing legal, privacy, and security constraints.

Regarding the transmission of citizenship and immigration-status information to the States, DHS possesses statutory authority under 8 U.S.C. § 1373 to send and receive immigration status information to and from federal, state, and local government entities, to maintain such information, and to exchange such information with federal, state, and local government entities. Further, under 8 U.S.C. § 1373(a) and (b) DHS further possesses statutory authority pursuant to the Immigration Reform and Control Act of 1986, Public Law 99-603, that requires the creation of an electronic system for verifying the immigration status of alien applicants for and recipients of certain federally funded benefits. This system must be made available to federal, state, and local agencies administering those benefits. Additionally, under the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Public Law 104-208, DHS is required to respond to federal, state, and local inquiries to verify citizenship and/or immigration status for any individual within the jurisdiction for any purpose authorized by law.

**State Citizenship Lists:** The core of the proposed approach is a technological mechanism that should be delivered on or around June 30, 2026, and will initially focus on secure access for state election officials. The idea is to provide States with citizenship list information from USCIS, SSA, and DOS, including a digital portal mechanism for States to access and download such information, while the underlying records remain in each agency's existing systems, to the extent that such access can be provided consistent with applicable law. This structure preserves agency control over its own data and leverages established security and privacy controls. It also allows state officials to determine how to use this information.

In practice, state election officials will be provided access to a portal via Login.gov. Via that portal, States will be able to download separate outputs from USCIS, SSA, and DOS, subject to agency-specific terms of service and disclaimers. The downloaded files will provide citizenship related data elements, such as name, date of birth, and relevant agency identifiers.

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The federated portal design has several advantages that support meeting the required delivery dates. It will allow USCIS, SSA, and DOS to rely heavily on existing Systems of Records Notices (SORNs), Privacy Impact Assessments (PIAs), and interagency agreements and to focus on targeted updates. By retaining data in existing agency enclaves and using the portal as a common access point for state election officials, DHS can provide meaningful functionality on or around June 30, 2026, while remaining firmly within current legal and privacy frameworks. In addition, DHS will continue to work to generate from the information contained in this portal a consolidated list of United States citizens and residents of the applicable State to provide to state election officials no fewer than 60 days before each regularly scheduled Federal election.

**Implementation Status and Privacy Documentation:** USCIS is currently on track to deliver the core digital portal infrastructure needed for state access on or around June 30, 2026. Technical teams have defined the basic architecture, including use of Login.gov for user authentication and mechanisms for each agency to generate, package, and transmit state specific reports for download. Backend development to support report generation, logging, and status tracking is underway, and initial testing is being planned to ensure that the portal can handle state requests in the timelines dictated in EO 14399. No live user data has been used to date, however.

Applicable privacy offices and counsel are coordinating to ensure that only those data elements necessary for state citizenship list compilation and maintenance are shared, that States' use, retention, and redisclosure of the information are constrained through appropriate agreements and terms of service, and that the portal's operations align with existing legal authorities and published SORNs and PIAs, supplemented as needed on a prioritized basis.

**Citizen Facing Portal and Phased Delivery:** EO 14399 and the outcomes identified with DHS contemplate, in addition to state facing capabilities, a portal through which individual citizens can view their own records and submit corrections. USCIS recognizes the importance of this transparency and redress function but does not believe it is feasible to deliver a production ready citizen facing portal on or about June 30, 2026.

Accordingly, USCIS proposes a phased approach. The first phase focuses on delivering, on or about June 30, 2026, the state facing digital portal that operates in a federated manner and leverages existing agency privacy and security enclaves, thereby enabling States to access citizenship related data. Subsequent phases, later in 2026, would focus on designing and implementing the citizen-facing portal once the required legal, privacy, and technical work is complete. This sequencing allows DHS to meet its immediate responsibilities under EO 14399 while reducing the risk of deploying a citizen facing capability without sufficient legal and privacy support.

**Integration with USPS Mail-In and Absentee Ballot Voter Lists:** In coordination with the Postmaster General, USCIS is also exploring a concept that, depending on the conclusion of USPS's pending rulemaking and implementation process, could allow DHS to leverage USPS data related to mail-in and absentee ballot participation lists. This potential capability is neither contemplated nor required by EO 14399. Moreover, no determination has yet been rendered as to the feasibility, desirability, or legality of such an approach, which, as noted above, is dependent on

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the outcome and content of a final USPS rulemaking, if any. Further policy and legal input would also need to be obtained prior to proceeding.

**Signature Level Justification:** EO 14399 designates DHS, acting through the Director of USCIS, as the agency responsible for compiling, maintaining, and transmitting State Citizenship Lists. Given the Department wide implications of this role and the cross-component coordination required with SSA, DOS, and USPS, a DHS Secretary level signatory is required to authorize USCIS to proceed with the approach outlined in this memorandum.

**Timeliness:** USCIS must establish the infrastructure to compile, maintain, and transmit State Citizenship Lists, and designate a DHS point of contact for those lists, within the timeframe directed by EO 14399. Meeting this accelerated mandate requires solutions that can be implemented rapidly, that rely on existing authorities and infrastructure wherever possible, and that limit the need for new legal and privacy constructs before June 30, 2026. The digital portal approach described above meets these criteria by building upon existing agency systems and privacy frameworks, distributing data maintenance responsibilities across USCIS, SSA, and DOS, and placing reconciliation and integration responsibilities with the States.

By focusing first on a federated, state-facing portal and by planning citizenship-facing transparency as a follow-on enhancement, DHS can meet the EO's near term requirements while positioning itself for further improvements once legal and privacy work is complete.

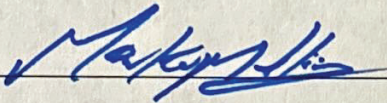
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**Recommendation:** USCIS advises DHS leadership to approve the technological approach described in this memorandum as DHS's primary means of implementing EO 14399 at this time. Under this approach, USCIS, in coordination with SSA and DOS, would deliver by June 30, 2026, a mechanism for State use that provides secure, state focused access to citizenship-related information from each agency, with data remaining in each agency's existing privacy and security enclaves. USCIS further recommends endorsing a phased plan under which citizen-facing portal capabilities would be developed and implemented later in 2026, once sufficient legal, privacy, and technical groundwork has been completed. Finally, USCIS recommends that DHS continue preliminary conversations with USPS concerning potential data-sharing arrangements, and should USPS finalize its rulemaking process, consider working to advance potential coordination to the extent feasible and consistent with applicable law and privacy protections. This strategy provides a timely, legally compliant, and operationally achievable path to deliver the State Citizenship List infrastructure required under EO 14399 by June 30, 2026, and lays a foundation for future enhancements that can further strengthen election related integrity and transparency.

Approve/date



4/8/26

Disapprove/date

Modify/date

Needs discussion/date