

DIRECTIVE 2025-02

January 14, 2025

To: All County Boards of Elections

Board Members, Directors, and Deputy Directors

Re: Data Collection, Notice, and Cancellation Procedures for Completion of the 2021 General Voter Records Maintenance Program and Past Due Cancellations

SUMMARY

Maintaining accurate voter registration rolls is critical to ensuring elections are secure. This directive provides instructions to boards of elections for the completion and removal of abandoned registrations identified under the National Change of Address (NCOA) and Supplemental Process components of the 2021 General Voter Records Maintenance Program¹ as well as removal of past due cancellations.

BACKGROUND

The General Voter Records Maintenance Program is a requirement of the National Voter Registration Act of 1993 (NVRA),² commonly referred to as the “motor voter law,” that was signed into law on May 20, 1993. The purposes of the NVRA are to increase the number of voter registrations for eligible citizens, to enhance the participation of eligible citizens in the voter process, to protect the integrity of the electoral process, and to ensure that accurate voter registration rolls are maintained.³

Following passage of the NVRA, the Ohio General Assembly enacted Substitute Senate Bill 300 to incorporate the requirements of federal law into Ohio law. Thus, since 1995, state law has required local election officials to conduct the state’s general voter records maintenance program every year.⁴

¹ [Directive 2021-19](#).

² [52 U.S.C.A. §20507](#).

³ [52 U.S.C.A. §20507](#).

⁴ [R.C. 3503.21\(A\)\(7\); \(B\)\(2\)](#).

There are two parts of Ohio's implementation of the general voter records maintenance program:

The NCOA Process: The NCOA process compares boards of elections' voter rolls with the United States Postal Service (USPS) NCOA database to identify electors who have moved since the records were last compared, and who thus may need to update their voter registrations to their current voting residence address. Under state law, the Secretary of State matches voter records in the Statewide Voter Registration Database against the NCOA database to compile the data for the NCOA Process.⁵

The Supplemental Process: Not every Ohio elector who moves files a change of address with the U.S. Postal Service. Therefore, Ohio's general voter records maintenance program uses a second component to identify electors who may have moved and thus may need to reregister to vote where they are currently residing. This second component is known as the "Supplemental Process," because it seeks to identify electors whose lack of voter-initiated activity for two years indicates they may have moved, even though their names did not appear as a part of the NCOA Process. County boards of elections use voter-initiated activity in their local voter registration system to compile the data for the Supplemental Process.

Boards of elections started this work in 2021 under [Directive 2021-19](#) by identifying records under the 2021 NCOA and Supplemental processes and sending Confirmation Notices to those identified notifying them that their records would be removed if they failed to engage in voter activity over the next four years. State and federal law require the removal of a record that is sent a confirmation notice and fails to respond to the confirmation notice or update their voter registration, vote or engage in voter activity during the period of two federal elections subsequent to the mailing of the confirmation notice, or the next four years.⁶ Under Ohio law the records shall be canceled not later than one hundred twenty days after the four-year anniversary date in 2025 of the mailing of the 2021 Confirmation Notice. This Directive instructs boards on the 2025 cancellation process.

This Directive also requires each county board of elections to identify and remove past due cancelations. Past due cancelations include the following:

⁵ [R.C. 3503.21](#).

⁶ [R.C. 3503.21\(A\)\(7\); \(B\)\(2\)](#).

- I. **NCOA or Supplemental Records Prior to 2021:** The record is in confirmation status as a result of being on an Out-of-County NCOA list or Supplemental list prior to 2021;
- II. **Acknowledgement Notice Returned Undeliverable:** A record in confirmation status due to an acknowledgement notice being returned as undeliverable;⁷
- III. **BMV/SSA Mismatch:** A non-address BMV/SSA mismatch results in a confirmation notice being sent due to a mismatch of a driver's license number, last name, first name, or date of birth, because the last four digits of the social security number could not be verified, or based on whether an elector has been identified as deceased.

This Directive requires boards to send a registration readiness or "last chance" notice ([Secretary of State Form 255-A-3 – Updated 4/2024](#)) to all records identified under this Directive prior to removal. **No voter registration will be canceled before the May 2025 Election as a result of this Directive.**

Per the timelines set forth in this Directive, boards must provide a pre-cancellation list to the Secretary of State's office, and after successful review, boards will be instructed to remove the abandoned registrations.

INSTRUCTIONS

I. REGISTRATION READINESS NOTICES

Boards of elections must mail registration readiness notices ([Secretary of State Form 255-A-3 – Updated 4/2024](#)) to abandoned registrations identified under this Directive informing them that their registration may be removed if they do not respond to the notice, update their registration or engage in voter activity within the next six months. Before mailing registration readiness notices, boards must submit a "registration readiness file" to the Secretary of State's office.

A. Registration Readiness Timeline:

Prior to submitting the registration readiness file to the Secretary of State's office, each board of elections must complete the following steps:

1. Receive from all designated agencies and process all outstanding voter registration transactions by the close of business on **January 23, 2025**.⁸

⁷ [R.C. 3503.19\(C\)\(3\)](#).

⁸ [R.C. 3503.10](#).

2. Resolve all outstanding duplicate registrations by the close of business on **January 29, 2025**.

This timeline must be followed to ensure that each board resolves duplicate registrations without being impacted by another board's processing of voter registration transactions.

Each board must pause entering voter registrations between **January 24, 2025** and **February 7, 2025**.

B. Registration Readiness File Format:

By 12:00PM on February 7, 2025, each board of elections must upload the spreadsheet containing the registration records that will receive a registration readiness notice. The spreadsheet must be uploaded to the board's SharePoint folder in a .csv format.

All boards must utilize the same spreadsheet format, containing the following information:

- County Number
- County Name
- State Voter ID
- Cancel Reason (NCOA, Supplemental or Past Due)
- Registration Date
- Last Voted Date
- First Name
- Last Name
- Address
- Address 2
- City
- State
- Zip Code
- Voter Status
- Confirmation Notice Mail Date

C. Registration Readiness Records Criteria:

Each record provided in the spreadsheet must meet the following data conditions:

- **For All Records:**
 - The Confirmation Notice must have been mailed no later than September 20, 2021;
 - The record must not contain any voter-initiated activity between the date the Confirmation Notice was mailed and the date the data is compiled for the mailing of the registration readiness notice. Voter-initiated activity includes

- voting, submitting a valid absentee ballot application, registering to vote, updating or confirming an address with a board of elections or the Bureau of Motor Vehicles (BMV), or signing a candidate or issue petition that is verified by a board of elections;
 - The record does not appear on the “Automatic Confirmation of Address Safeguard” list on the Board of Elections Portal;
- And, if the record is in active-confirmation status as a result of the **2021 NCOA process**:
 - The record must be contained on the 2021 Out-of-County NCOA list;
- And, if the record is in active-confirmation status as a result of the **2021 Supplemental process**:
 - The record must not contain any voter-initiated activity between August 6, 2019 and the date the data is compiled for the mailing of the registration readiness notice;
- And, if the record is in active-confirmation status as a result of a **Past Due Cancellation**:
 - The record is in active confirmation status as a result of being on an Out-of-County NCOA list or Supplemental list prior to 2021; or
 - The record’s acknowledgement notice was returned undeliverable; or
 - The record’s information in the voter’s records did not match BMV/SSA (non-address information).⁹

The Secretary of State’s staff will review each board of election’s data. If the outcome of the review is satisfactory, the Secretary of State’s office will email each board to authorize the board to mail registration readiness notices.

D. Registration Readiness Notice Mailing:

Boards of elections, by forwardable mail, must mail the registration readiness notice ([Secretary of State Form 255-A-3 – Updated 4/2024](#)), to each registration that meets the criteria above. Each board must finish mailing the notices by **March 5, 2025**. The “Your Voter Registration Information” box at the top of page two of Form 255-A-3 must be populated with date issued, name and address. If the elector replies to the notice by

⁹ See Election Official Manual, [Chapter 4, Section 4.07](#). (The Driver’s License Number (DLN) could not be verified; the Last Name (LN) could not be verified; the First Name (FN) could not be verified; the Date of Birth (DOB) could not be verified; the Last Four Digits of Social Security number (SSN4) could not be verified; and/or whether the elector has been identified as deceased.)

updating or confirming the elector's address at any time prior to the anticipated cancelation date, the elector's registration must not be canceled. The board must review and follow the outsourcing required mailings section in [Chapter 2, page 46 of the Election Official Manual](#).

Boards must include a courtesy reply mail return envelope with each notice. As a reminder, each board must incorporate the use of the Official Election Mail logo on both outbound and inbound envelopes used with the registration readiness notices. Each board should consult with its Election Mail Coordinator for assistance in preparing for this mailing. Boards must ensure proper quality control is performed to ensure the registration readiness notice ([Secretary of State Form 255-A-3 – Updated 4/2024](#)) and the courtesy reply mail return envelope are properly printed and included in the outbound mailing envelope. This mailing should be designed to encourage recipients to read the contents.

II. INSTRUCTIONS FOR CANCELATIONS PURSUANT TO THE 2021 NCOA AND SUPPLEMENTAL PROCESS AND PAST DUE CANCELATIONS

Boards of election must adhere to the following instructions before proceeding to any cancelation.

A. Pre-Cancelation Spreadsheet Timeline:

Before completing any cancelations pursuant to this Directive, all boards must submit a "pre-cancelation file" to the Secretary of State's office. Prior to providing the pre-cancelation file, boards must process all outstanding voter registration transactions and timely resolve duplicate registrations. To meet the goal of resolving all duplicate registrations prior to providing the pre-cancelation spreadsheet, each board must complete the following steps:

1. Receive from all designated agencies and process all voter registration transactions received by the close of business on **August 11, 2025**.¹⁰
2. Resolve all outstanding duplicate registrations by the close of business on **August 18, 2025**.

This timeline must be followed to ensure that each board resolves duplicate registrations without being impacted by another board's processing of voter registration transactions. Each board must pause entering voter registrations between **August 12, 2025** and **August 25, 2025**.

By 12:00PM on August 25, 2025, each board must upload the spreadsheet containing the records of registrations that are pending cancelation pursuant to the 2021 NCOA and Supplemental Processes and Past Due Cancelations.

¹⁰ [R.C. 3503.10](#).

B. Pre-Cancellation Spreadsheet File Format:

The pre-cancellation file format is the same as the registration readiness file in Section I. B. of this Directive and must also include the Registration Readiness Notice Mail Date and must be uploaded to the board's SharePoint folder in a .csv format.

C. Pre-Cancellation Data Checks:

Each record provided in the spreadsheet must meet the same data conditions as the registration readiness file in Section I. C. Additionally:

1. The record was on the approved registration readiness list and received a registration readiness mailing;
2. No voter activity must have occurred between the mailing of the Confirmation Notice and compiling the data for the pre-cancellation file;
3. The record does not appear on the "Do Not Cancel" list. This list will be provided by the Secretary of State's office prior to the deadline to upload the list of identified records.

D. Cancellation Process:

The Secretary of State's staff will review each board's pre-cancellation file. If the outcome of the review is satisfactory, the Secretary of State's office will email each board to authorize the board to proceed with canceling the registrations. The boards must not cancel any registration until receipt of that email. Prior to canceling any records, boards must update voter-initiated activity for any voter who signed a petition that was verified by the board or had any other type of voter-initiated activity. All identified records must be canceled on **September 23, 2025**. If a board of elections is holding a special or charter election within 30 days of that date, the board must notify the Secretary of State's office as soon as that is known, so that an alternative date can be set.

Boards of elections must not cancel any registration pursuant to this Directive to which any of the following apply:

1. The registration appears on the "Do Not Cancel" list;
2. The registration is impacted by a voter registration vendor's error known to the board;
3. The registration appears on the Secretary of State's Statewide Voter Registration Database ("SWVRD") in "active" status.

By 12:00PM on September 24, 2025, each board must upload the spreadsheet containing the registrations that received the registration readiness notice and were canceled. The cancelation file format is the same as described above for the pre-cancelation file. The cancelation file must be uploaded to the board's SharePoint folder in a .csv format.

III. MAINTAINING RECORDS OF CANCELATION

Each board must work with its voter registration vendor to ensure that its county voter registration system maintains and can produce a list of voter registrations canceled pursuant to this Directive. Boards must record all of the following in their county's voter registration system:

- The date that it mailed a registration readiness notice ([Secretary of State Form 255-A-3 – Updated 4/2024](#)) to an elector; and
- If the elector responds to the notice, the date on which the elector responded; and
- If the elector does not respond to the notice, the date the registration was canceled.

Boards of elections must maintain and make available for public inspection and copying at a reasonable cost all records concerning the implementation of programs and activities conducted for the purpose of ensuring the accuracy and currency of registration lists, including the names and addresses of all registered electors sent Confirmation Notices and whether the elector responded to the Confirmation Notice.¹¹

IV. REIMBURSEMENT INSTRUCTIONS

Counties are eligible for reimbursement of actual costs for printing and mailing registration readiness notices sent pursuant to this Directive. If your board would like to be reimbursed, please follow the instructions below and email copies of documents to Ann Boehnlein at aboehnlein@ohiosos.gov. Please submit your board's reimbursement request by May 23, 2025.

A county seeking reimbursement for the registration readiness mailings that were sent as a result of this Directive must include:

1. The registration readiness mailing spreadsheet detailing total costs.
2. A contract or Memorandum of Understanding with a third-party mailing vendor (if applicable).
3. Invoices from each vendor/supplier.

¹¹ [52 U.S.C.A. § 20507\(i\)](#); [R.C. 3503.26\(B\)](#); CBE-44 & CBE-46, [Secretary of State Retention Schedule](#).

4. If the mailing is completed in-house by the board, please include an itemized list which describes each item and cost and how the costs were determined. Please include any back-up documentation available for proof of these costs.
5. Only actual costs for postage or items used for this mailing will be reimbursed. If, for example, the board purchased 1,000 envelopes, but only 100 were used for this mailing, the board will be reimbursed only for the supplies that were used on a cost-per-unit basis.
6. County-paid vouchers (proof that the payment to the vendor/supplier was made).
7. If the board performed this mailing in-house, related expenses for reimbursement can still be submitted. When submitting the spreadsheet and documentation for reimbursement, in the body of the email please provide a breakdown of the calculation of costs for envelopes, printing, and postage per registrant.

If you have any questions regarding this Directive, please contact the Secretary of State's office at (614) 728-8789 or via email at Intake@OhioSoS.gov.

Yours in service,



Frank LaRose
Ohio Secretary of State