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DIRECTIVE 2012-32

August 9, 2012

To: All County Boards of Elections
Directors, Deputy Directors, and Board Members

Re: Online Change of Address System

SUMMARY

The Secretary of State's Office has developed and launched an Online Change of Address System available to voters at www.MyOhioVote.com. Using this web portal, registered voters of the State of Ohio will be able to change their residential address online, either within a county or from one county to another, as an alternative to completing a paper voter registration form.

This Directive provides guidance to boards of elections on the local processes necessary to implement this new system.

BACKGROUND

To use the Secretary of State's Online Change of Address System, the user's voting status must be listed either as active or inactive in the Statewide Voter Registration Database (SWVRD).¹ In order to begin the process of updating the elector's residential address, the elector must enter his/her Name, the last four digits of his/her Social Security Number (SSN4), his/her Ohio Driver's License Number, and Date of Birth. If all of the information provided by the elector matches the data in the SWVRD, then the user can proceed with entering his/her new residential address. If the information does not match, or is not present in the SWVRD as described below, then the user will be prompted to complete, print, and sign a paper voter registration form to mail or deliver to the appropriate county board of elections.

¹ A registered voter has an "inactive" status (listed in the SWVRD as "active-confirmation") if the voter was sent, but did not respond to, a confirmation card mailed to the voter by a county board of elections. A confirmation card is sent: 1) as part of the NCOA process (see Directive 2011-15), 2) for NVRA list maintenance (see Directive 2011-15), 3) when the voter's acknowledgement notice was returned as undeliverable (see R.C. 3503.19(C)(3)), or 4) because information contained on the first-time voter registrant's record did not match BMV/SSA records (see Directive 2012-16).

After the user has confirmed the change of address, he/she will be given a tracking number. This tracking number will be associated with the XML packet that is sent from the Online Change of Address System to the county's voter registration system (VRS). The XML packet will contain all of the data necessary for the Board to determine whether the voter can be properly added to the county's voter registration rolls as described below. If the voter is updating his/her registration to a new county, the XML packet will contain an electronic image file of the voter's signature. If the voter is updating within the same county, no electronic image file will be sent, as the county already has an electronic image file of the voter's signature in its VRS.

To avoid confusion, the Online Change of Address System will be unavailable starting at 11:59 p.m. on the close of registration for any general election or primary election² and through that election.

INSTRUCTIONS

I. PROCESSING ONLINE CHANGE OF ADDRESS RECORDS

A. Tools

XML packets containing voter change of address data will be sent from the online change of address system on a regular basis. Your VRS vendor has developed, at the expense of the Secretary of State's Office, reporting capability to enable your board of elections to review the incoming voter records and to accept them into your VRS. If you have not already received training on this process, contact your VRS vendor. Training materials for each of the VRS vendors are available on the Secretary of State's BOE Portal.

B. Timeline

Each board of elections must access its online change of address report and process (i.e., accept or reject) all records into its VRS at least once every workday.

Beginning the 60th day before *any* election and through the close of registration for that election, each board of elections must access its online change of address report and process (i.e., accept or reject) all records into its VRS at least twice every workday.

C. Rejecting Records

In the unusual circumstance that the processing of online records results in a rejection of the record from your VRS, you must:

² As defined by R.C. 3501.01(E).

- Document the reason for the rejection in your county VRS, carefully following the instructions for documenting a rejection provided by your vendor;
- Contact the voter by first class U.S. mail, phone, or email if that information was provided by the user and contained in the XML packet, and inform him/her of the need to provide complete information; and
- Contact Robin Fields in the Secretary of State's Office at (614) 466-2585.

If you have not already received training on this process, contact your VRS vendor.

Similar to a paper registration form, if an otherwise complete online change of address is timely submitted to the wrong county (as a result of the voter entering the incorrect county), it is still a valid change of address and must be treated as such. A board of elections that rejects a record because the voter's address is not in the county must contact Caitlin Decatur or Robin Fields via email at (SWVRD@OhioSecretaryofState.gov) within 24 hours of the rejection, so the Secretary of State's Office can redirect the record to the correct county.

Additionally, as you are already doing with paper registration forms, submission by a user of a valid, in-county street address that contains a street name not in your street/road table must not be rejected. Instead, it must be amended by the board of elections to conform to the county's street/road table.

Example: Submission of "1234 State Route 161" when the board's street table names that road "East Dublin-Granville Road" must not be rejected as invalid.

II. ELECTRONIC IMAGES OF SIGNATURES

A. File Size Requirements

An individual voter's signature image file may not exceed 32 kilobytes (32K) of storage space. By August 15th, county boards of elections must audit their signature images files to determine whether any file exceeds 32K and, if necessary, rescan the original image or reformat the existing file to conform to this requirement

B. File Content Requirements

An individual voter's signature image file may not contain any other image. It is not acceptable to substitute an image of the voter registration form or another document in place of the voter's signature image. By August 31st, county boards of elections must audit their signature images files to determine whether a file contains any other image and, if necessary, rescan image files to conform to this requirement.

C. “Bad Signature” Acknowledgement

If you receive a signature acknowledgement ‘3000 Bad signature for voter OH00XXX’ from the SWVRD, you must rescan or resize and then resend the voter’s signature image file to the SWVRD. If you have not already received training on this process, contact your VRS vendor.

A “bad signature” acknowledgement must be resolved within two business days.

D. Missing Signatures

On Monday of every week, the Secretary of State’s Office will post to the BOE Portal a list of all voter records, by county, without a signature file associated with the record. Boards of elections must download the list each week and upload a signature file to the SWVRD by the close of that week.

If the voter record has no signature image on file because the voter registered prior to the digitalization of voter signatures from original voter registration forms, the board of elections must contact the voter by August 31, 2012 to obtain a signature to include with the voter’s record by September 14, 2012. The Board should use Form 260 or its local equivalent.

E. Scanning Signatures from Paper Registration Forms

When a valid paper registration form is timely received by a board of elections, the board of elections must upload to the SWVRD the signature image associated with that voter’s record from the paper registration form no later than 24 hours after the voter record is sent to the SWVRD.

III. ISSUING ACKNOWLEDGEMENT CARDS

All boards of elections must issue acknowledgement cards at least one time per week. This weekly batch of acknowledgement cards must include all online changes of address and traditional paper voter registration forms (for new registrations, changes of address, and changes of name) received during the week before the batch run and/or mail date.

IV. USABILITY EXPECTATIONS AND SUPPORT

A. Usability Expectations

Based on the system requirements (i.e., Name, SSN4, Ohio Driver’s License Number, DOB), the majority of Ohio’s registered voters will be able to utilize the Online

Change of Address System to update their residential voting address. However, there will be some situations when the user will not be able to use the system. They are as follows:

1. Duplicate Voter Records

If the user has more than one voter record in the SWVRD (i.e., a duplicate), the user will be unable to access the system and must default to a traditional paper voter registration form. For this reason, boards of elections must closely adhere to the requirements of Directive 2012-17 regarding duplicate resolution.

2. Information not in SWVRD

The Online Change of Address System matches on four data points (i.e., Name, SSN4, Ohio Driver's License Number, and DOB). If any of these is missing in the SWVRD, or the voter's signature was not uploaded to the SWVRD by the county (see Section II, above), the user will be unable to access the system and must default to a traditional paper voter registration form.

3. Incorrect Information in SWVRD

If information contained in the SWVRD is inaccurate (e.g., as a result of data entry error, etc.), but the user enters the correct information, the data points will not match, and the user will be unable to access the system. This user must default to a traditional paper voter registration form.

4. Inconsistent Information Provided

When all four data points are present in the SWVRD, but the user enters a variation of one of the data points (i.e., entering "Saint James" when the SWVRD contains "St James"), the user will be unable to access the system and must default to a traditional paper voter registration form.

5. Incorrect Information Provided

When information contained in the SWVRD is accurate, but the user enters false information, the data points will not match.

6. Not a Registered Voter

If the user is not presently a registered voter, the user's information is not contained in the SWVRD, and the user must default to a traditional paper voter registration form.

B. Support

In the event that a user is unable to access the system, he/she may call his/her board of elections or the Secretary of State's Office for assistance. One of the six "errors" explained in Section IV (above) is most likely the cause and the user must default to a traditional paper voter registration form. Boards of elections should assist voters as needed. If unexpected errors are experienced, Boards must promptly report them to Caitlin Decatur or Robin Fields by calling (614) 466-2585.

C. Widget Placement

No later than August 15th, each board of elections must place on its website a widget developed by the Secretary of State's Office, so any voter accessing the county board of elections' website seeking to change his/her address may be easily redirected to the online change of address portal. Secretary of State Widgets are online at (<http://www.sos.state.oh.us/SOS/elections/electionsofficials/electOffPubs/Widgets.aspx>).

V. REPORTING

Changes of address submitted through the Secretary of State's Online Change of Address System are considered "in person" registrations and must be tracked as changes of address for purposes of the EAC Survey. Boards of elections must track online change of address in a unique category, separate from all other changes of address forms.

If you have any questions regarding this Directive, please contact Matt Masterson, Caitlin Decatur, or Robin Fields in the Elections Division at (614) 466-2585.

Sincerely,



Jon Husted