



DIRECTIVE 2023-05

February 28, 2023

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

Re: Data Collection, Notice, and Cancellation Procedures for Completion of 2019 National Change of Address (“NCOA”) Process

BACKGROUND

State and federal law require maintaining accurate voter registration records. The Secretary of State’s Office is committed to encouraging all eligible voters to remain active voters. Therefore, this Directive requires each county board of elections to provide a list of registrations in active-confirmation status as a result of the 2019 NCOA Process pursuant to [Directive 2019-03](#) to the Secretary of State’s Office. The Secretary of State’s Office will publish the list of registrations in active-confirmation status to encourage a response to the notices that will be sent to registrations on the list.

This Directive requires the boards of elections to send a registration readiness notice ([Secretary of State Form 255-A-3 – Updated 2/24/2023](#)) to each registration that is in active-confirmation status as a result of the 2019 NCOA Process.

After the May 2, 2023 Primary/Special Election and per the timelines set forth in this Directive, boards must provide a pre-cancellation list, but only after (1) uploading all voter history from the primary/special election, if applicable, and (2) processing voter registration transactions pending after the election. Cancellations will occur in two phases as outlined in the instructions below.

INSTRUCTIONS

I. REGISTRATION READINESS NOTICES PURSUANT TO 2019 NCOA PROCESS

Before mailing registration readiness notices, boards must submit a “registration readiness file” to the Secretary of State’s Office. Boards must process any outstanding voter registration transactions and timely resolve duplicates before submitting the registration readiness file.

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 **March 6, 2023**.¹
2. Resolve all outstanding duplicate registrations by the close of business on **March 8, 2023**.

¹ [R.C. 3503.10](#)

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 registration registrations between **March 7** and **March 15, 2023**.

By 12:00 noon on March 10, 2023, each board of elections must upload the spreadsheet containing the registration records that will receive the registration readiness notice: Note that every record on the spreadsheet must receive a registration readiness notice, unless there is voter-initiated activity prior to the notice being mailed.

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

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

The spreadsheet must be uploaded to the board's SharePoint folder in a .csv format. Each record provided in the spreadsheet must meet the following data conditions:

- The record is in active-confirmation status as a result of the **2019 NCOA Process**;
- The record must be contained on the 2019 Out-of-County NCOA list;
- The Out-of-County Confirmation Notice must have been mailed no later than March 22, 2019;
- There must be no voter history on or after May 7, 2019;
- The registration date is before February 27, 2019;
- The record does 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 BMV, or signing a candidate or issue petition that is verified by a board of elections²; and

² See Election Official Manual, [Chapter 4, Section 4.01](#).

- The record does not appear on the “Do Not Cancel” list. This list will be provided prior to the deadline to upload the list of identified records.

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

Boards of elections must send, by forwardable mail, the registration readiness notice ([Secretary of State Form 255-A-3 – Updated 2/24/2023](#)) to each registration that meets the criteria above. Each board must finish mailing the notices by **March 23, 2023**. The notice must be populated with the recipient’s name and address. If the elector replies to the notice by updating or confirming the elector’s address at any time prior to the anticipated cancellation date, the elector’s registration must not be cancelled. Each board utilizing a vendor to print the notices must inform the vendor of the timeframe associated with this mailing to ensure the deadline is achieved. The board must review and follow the outsourcing required mailings section in [Chapter 2, page 47 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 2/24/2023](#)) and the courtesy reply mail return envelope are properly printed and included in the outbound mailing envelope. This mailing should be organized in a fashion that maximizes the recipients’ desire to read the contents.

Counties are eligible for reimbursement of actual costs for printing and mailing registration readiness notices sent pursuant to this Directive. Information regarding reimbursement procedures is forthcoming.

II. CANCELLATIONS PURSUANT TO THE 2019 NCOA PROCESS

Boards of elections are prohibited from cancelling any voter registration pursuant to the 2019 NCOA Process prior to the May 2, 2023 Primary/Special Election. The following instructions are for the period after the May 2, 2023 Primary/Special Election, preceding any cancellation.

A. PRE-CANCELLATION SPREADSHEET: 2019 NCOA PROCESS RECORDS

Before completing any cancellations pursuant to the 2019 NCOA Process, all boards must submit a “pre-cancellation file” to the Secretary of State’s Office. Prior to providing the pre-cancellation 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-cancellation 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 **June 12, 2023**.³

³ [R.C. 3503.10](#)

2. Resolve all outstanding duplicate registrations by the close of business on **June 14, 2023**.

This timeline must be followed to ensure that each board resolves duplicate registrations⁴ without being impacted by another board's processing of voter registration transactions. No earlier than the afternoon of **June 16, 2023**, boards may resume processing voter registration transactions.

By 12:00 noon on Friday, June 16, 2023, each board must upload the spreadsheet containing the records of registrations that are pending cancellation pursuant to the 2019 NCOA Process:

The pre-cancellation file format is the same as for the registration readiness file and must be uploaded to the board's SharePoint folder in a .csv format. Each record provided in the spreadsheet must meet the following data conditions:

- The record is in active-confirmation status as a result of the 2019 NCOA Process.
- The record appears on the 2019 Out-of-County NCOA list.
- The record's registration date is before February 27, 2019.
- The record does not contain voter history on or after May 7, 2019.
- The record does not contain any voter-initiated activity between the date the confirmation notice was mailed and the date the data is compiled for the pre-cancellation list. 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 BMV, or signing a candidate or issue petition that is verified by a board of elections.⁵
- The record appears on the registration readiness notice spreadsheet.

Boards are prohibited from cancelling any registration that appears on a "Do Not Cancel" list from the Secretary of State's Office.

B. CANCELLATION SPREADSHEET: 2019 NCOA PROCESS RECORDS

Once the Secretary of State's Office reviews the list of voter registration records pending cancellation, each board will receive an email instructing the board to proceed with cancelling the registrations. The boards must not cancel any registration until receipt of that email. Prior to cancelling 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 cancelled on **July 20, 2023**. 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.

⁴ See Election Official Manual, [Chapter 4, Section 4.01](#).

Boards of elections must not cancel any registration pursuant to the 2019 NCOA Process 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 board is missing voter history in their county voter registration database from any election between May 7, 2019 Primary/Special Election through the May 2, 2023 Primary/Special Election; or
4. The registration appears on the Secretary of State’s Statewide Voter Registration Database (“SWVRD”) in “active” status.

By 12:00 noon on July 25, 2023, each board must upload the spreadsheet containing the registrations that received the registration readiness notice and were cancelled. The cancellation file format is the same as described above for the registration readiness file and pre-cancellation file. The cancellation file must be uploaded to the board’s SharePoint folder in a .csv format.

III. MAINTAINING RECORDS OF CANCELLATION

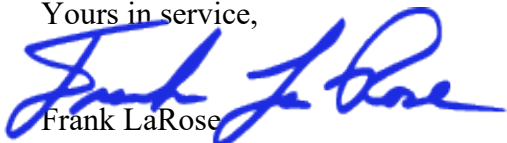
Each board must work with its voter registration vendor to ensure that its county voter registration system maintains and can produce a list of voter registrations cancelled pursuant this Directive. Boards must record all of the following in their county’s voter registration system:

- The date that it mailed a registration readiness notice ([Secretary of State Form 255-A-3 – Updated 2/24/2023](#)) to an elector;
- 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 cancelled.

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.⁶

If you have any questions regarding this Directive, please contact the Secretary of State’s Office at (614) 728-8789.

Yours in service,


Frank LaRose
Ohio Secretary of State

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