

DIRECTIVE 2024-06

May 2, 2024

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

Re: Data Collection, Notice, and Cancellation Procedures for Completion of 2020 National Change of Address (NCOA) Process and Past Due Cancellations

BACKGROUND

State and federal law require maintaining accurate voter registration records.¹ 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 2020 NCOA Process pursuant to [Directive 2020-10](#) to the Secretary of State's office. This Directive also requires each county board of elections to provide a list of past due cancellations, including registrations in active-confirmation status that have remained inactive for four consecutive years or more. 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 4/2024](#)) to each registration that is in active-confirmation status as a result of the 2020 NCOA Process.

Per the timelines set forth in this Directive, boards must provide a pre-cancellation list to the Secretary of State's office, but only after (1) uploading all voter history from the March 19, 2024 election, if applicable, and (2) processing pending voter registration transactions after the election. Cancellations will occur in two phases as outlined in the instructions below.

INSTRUCTIONS

I. REGISTRATION READINESS NOTICES PURSUANT TO THE 2020 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 **May 13, 2024**.²

¹ R.C. 3503.21; R.C. 3503.151(A); 52 U.S.C. § 20507.

² [R.C. 3503.10](#).

2. Resolve all outstanding duplicate registrations by the close of business on **May 17, 2024**.

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 **May 14** and **May 21, 2024**.

By 12:00PM on May 21, 2024, 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 2020 NCOA process;
- The record must be contained on the 2020 Out-of-County NCOA list;
- The Out-of-County Confirmation Notice must have been mailed no later than June 30, 2020;
- There must be no voter history on or after April 28, 2020;
- The registration date is before February 18, 2020;
- 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 Bureau of Motor Vehicles (BMV), or signing a candidate or issue petition that is verified by a board of elections;³ and

- 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 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.

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 **May 31, 2024**. 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 updating or confirming the elector’s address at any time prior to the anticipated cancellation date, the elector’s registration must not be canceled. 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 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.

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 August 16, 2024.

A. REIMBURSEMENT INSTRUCTIONS

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.

³ See Election Official Manual, [Chapter 4, Section 4.01](#).

- a. 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.
 - b. 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.
4. County-paid vouchers (proof that the payment to the vendor/supplier was made).
5. 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.

II. CANCELTATIONS PURSUANT TO THE 2020 NCOA PROCESS

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

A. PRE-CANCELTATION SPREADSHEET: 2020 NCOA PROCESS RECORDS

Before completing any cancellations pursuant to the 2020 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 **July 11, 2024**.⁴
2. Resolve all outstanding duplicate registrations by the close of business on **July 12, 2024**.

This timeline must be followed to ensure that each board resolves duplicate registrations⁵ without being impacted by another board’s processing of voter registration transactions. No earlier than the afternoon of **July 15, 2024**, boards may resume processing voter registration transactions.

By 12:00PM on July 15, 2024, each board must upload the spreadsheet containing the records of registrations that are pending cancellation pursuant to the 2020 NCOA Process:

⁴ [R.C. 3503.10](#).

⁵ See Election Official Manual, [Chapter 4, Section 4.01](#).

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 2020 NCOA Process.
- The record appears on the 2020 Out-of-County NCOA list.
- The record's registration date is before February 18, 2020.
- The record does not contain voter history on or after April 28, 2020.
- 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.⁶
- The record appears on the registration readiness notice spreadsheet.

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

B. CANCELATION SPREADSHEET: 2020 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 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 **July 22, 2024**. 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 the 2020 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 April 28, 2020 Presidential Primary Election through the March 19, 2024 Presidential Primary Election; or

⁶ See Election Official Manual, [Chapter 4, Section 4.01](#).

4. The registration appears on the Secretary of State's Statewide Voter Registration Database ("SWVRD") in "active" status.

By 12:00PM on July 23, 2024, each board must upload the spreadsheet containing the registrations that received the registration readiness notice and were canceled. 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. ADDITIONAL LIST MAINTENANCE REQUIREMENTS – PAST DUE CANCELATIONS

A. PRIOR GENERAL VOTER RECORDS MAINTENANCE PROCESSES

As required by state and federal law, boards of elections are required to maintain accurate voter registration databases. As part of an ongoing data integrity review, the Secretary of State's Office of Data Analytics and Archive identified potential past due cancellations. To identify any past due cancellations each board of elections is required to review their voter registration databases for records that were (1) previously identified in past NCOA or Supplemental Process directives;⁷ (2) have not engaged in voter-initiated activity⁸ since receiving a confirmation notice (during the period of the appropriate four-year anniversary date subsequent to the mailing of the confirmation notice); but (3) were not removed from the board's voter registration databases. Any registration that is identified pursuant to this section must receive a registration readiness notice, as described below in Section C.

B. ROUTINE CANCELATIONS PURSUANT TO THE ELECTION OFFICIAL MANUAL

Each county board of elections must fulfill its obligations for cancellations that are NOT part of the state's NCOA Process or Supplemental Process (commonly referred to as the state's general voter records maintenance program).

These obligations include, but are not limited to, cancellations where: (1) a voter's acknowledgement notice was returned undeliverable and (2) certain information in the voter's records did not match BMV/SSA records.⁹ As part of the same ongoing data integrity review, the Secretary of State's Office of Data Analytics and Archive identified potential past due cancellations including where a voter's acknowledgement notice was returned undeliverable and where certain information in the voter's records did not match BMV/SSA records. To identify any past due cancellations each board of elections is required to review their voter registration databases for: (1) records that were placed in confirmation status because a voter's acknowledgement notice was returned undeliverable or certain information in the voter's records did not match BMV/SSA records;¹⁰ (2) have not engaged in voter-initiated activity¹¹ since receiving a confirmation notice

⁷ See Election Official Manual, [Chapter 4, Section 4.01](#).

⁸ See Election Official Manual, [Chapter 4, Section 4.01](#).

⁹ [R.C. 3503.19\(C\)](#); Election Official Manual, [Chapter 4](#), Sections 4.01, .04, and .07.

¹⁰ [R.C. 3503.19\(C\)](#); Election Official Manual, [Chapter 4](#), Sections 4.01, .04, and .07.

¹¹ See Election Official Manual, [Chapter 4, Section 4.01](#).

(during the period of the appropriate four-year anniversary date subsequent to the mailing of the confirmation notice); but (3) were not removed from the board’s voter registration databases. Any registration that is identified pursuant to this section must receive a registration readiness notice, as described below in Section C.

C. INSTRUCTIONS FOR REGISTRATION READINESS NOTICES PURSUANT TO ADDITIONAL LIST MAINTENANCE REQUIREMENTS

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 **May 13, 2024**.¹²
2. Resolve all outstanding duplicate registrations by the close of business on **May 17, 2024**.

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 **May 14** and **May 21, 2024**.

By 12:00PM on May 21, 2024, 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; Supplemental; BMV/SSA mismatch, Acknowledgement notice returned undeliverable)
- Registration Date
- Last Voted Date
- First Name
- Last Name
- Address
- Address 2

¹² [R.C. 3503.10](#).

- 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 a previous NCOA Process; previous Supplemental Process; BMV/SSA mismatch, Acknowledgement notice returned undeliverable;
- The Out-of-County Confirmation Notice must have been mailed no later than June 30, 2020;
- There must be no voter history on or after April 28, 2020;
- The registration date is before February 18, 2020;
- 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 Bureau of Motor Vehicles (BMV), or signing a candidate or issue petition that is verified by a board of elections;¹³ and
- 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 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.

Boards of elections must send, by forwardable 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 **May 31, 2024**. The "Your Voter Registration Information" 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 updating or confirming the elector's address at any time prior to the anticipated cancellation date, the elector's registration must not be canceled. 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 46 of the Election Official Manual](#).

¹³ See Election Official Manual, [Chapter 4, Section 4.01](#).

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.

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 a Boehnlein@ohiosos.gov. Please submit your board's reimbursement request by August 16, 2024.

D. REIMBURSEMENT INSTRUCTIONS

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.
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.

IV. CANCELATIONS PURSUANT TO ADDITIONAL LIST MAINTENANCE ACTIVITIES

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

A. PRE-CANCELATION SPREADSHEET: ADDITIONAL LIST MAINTENANCE ACTIVITIES

Before completing any cancellations pursuant to the Additional List Maintenance 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 **July 11, 2024**.¹⁴
2. Resolve all outstanding duplicate registrations by the close of business on **July 12, 2024**.

This timeline must be followed to ensure that each board resolves duplicate registrations¹⁵ without being impacted by another board's processing of voter registration transactions. No earlier than the afternoon of **July 15, 2024**, boards may resume processing voter registration transactions.

By 12:00PM on July 15, 2024, each board must upload the spreadsheet containing the records of registrations that are pending cancellation pursuant to the Additional List Maintenance 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 a previous NCOA Process; previous Supplemental Process; BMV/SSA mismatch, Acknowledgement notice returned undeliverable;
- The record's registration date is before February 18, 2020;
- The record does not contain voter history on or after April 28, 2020;
- 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;¹⁶ and
- The record appears on the registration readiness notice spreadsheet.

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

¹⁴ [R.C. 3503.10](#).

¹⁵ See Election Official Manual, [Chapter 4, Section 4.01](#).

¹⁶ See Election Official Manual, [Chapter 4, Section 4.01](#).

B. CANCELATION SPREADSHEET: ADDITIONAL LIST MAINTENANCE ACTIVITIES

Once the Secretary of State's office reviews the list of voter registration records pending cancelation, each board will receive an email instructing 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 **July 22, 2024**. 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 the Additional List Maintenance 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 April 28, 2020 Presidential Primary Election through the March 19, 2024 Presidential Primary Election; or
4. The registration appears on the Secretary of State's Statewide Voter Registration Database ("SWVRD") in "active" status.

By 12:00PM on July 23, 2024, 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 registration readiness file and pre-cancelation file. The cancelation file must be uploaded to the board's SharePoint folder in a .csv format.

All boards must compile a separate .csv in the following format, containing the following information:

- County Number
- County Name
- State Voter ID
- Confirmation Status Reason (NCOA Out of County, Supplemental, BMV/SSA mismatch, Acknowledgement notice returned undeliverable, etc.)
- Registration Date
- Last Voted Date
- First Name
- Last Name
- Address
- Address 2
- City

- State
- Zip Code
- Voter Status
- Confirmation Notice Mail Date, if available otherwise leave blank

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 and has been in confirmation status prior to June 30, 2020;
- The record does not contain any voter-initiated activity after June 30, 2020, 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; and
- Record did not appear on an out-of-county NCOA list after June 30, 2020.

C. 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.¹⁷

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

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