

DIRECTIVE 2024-11

June 27, 2024

To: All County Boards of Elections
Board Members, Directors, and Deputy Directors
Re: Voter Registration Data Integrity

SUMMARY AND BACKGROUND

This Directive outlines the purpose of the 2024 Voter Registration Data Integrity project and introduces the new Registration Audit Dashboard now available to all Ohio county boards of elections on the BOE portal.

The process of registering voters in Ohio has evolved over the years, especially with the addition of online voter registration, the creation of a Statewide Voter Registration Database, and the codification of standard definitions of election data terms.¹ For decades, Ohio's voter registration system relied entirely on hand-written paper records processed by 88 different county boards of elections. This disparate method of administration lacked consistent guidelines for documenting key fields such as birthdates and registration dates. When the General Assembly directed the Secretary of State to create a Statewide Voter Registration Database (SWVRD), these data points became a statutory requirement. To populate these data fields for registrations created prior to the centralized database, boards sometimes used a placeholder date, such as January 1, 1800², especially where handwritten records were illegible or incomplete. The General Assembly recognized this in 2014, including an amendment in election-related legislation that ensured voters were not denied a provisional ballot based only on a placeholder birthdate, if they could otherwise prove their identity. Further, the administrative process of transferring handwritten voter registration forms to electronic data fields occasionally resulted in transcription errors, such as a mistyped character in a name. This resulted in the development of Data Entry Standards set forth in Chapter 4 of the Election Official Manual, which requires each county board of elections to "review its existing records in the SWVRD and make any and all changes necessary to comply with the data entry standards outlined in this Section."³

These data entry discrepancies are not commonly indicative of fraud or irregularities, but they must be resolved in order to comply with our shared statutory responsibility to "maintain the accuracy of the statewide voter registration database."⁴ This action is especially critical as we work toward the implementation of the DATA Act, a new law enacted in 2023 requiring the retention of registration and election records by the Secretary of State's Office of Data Analytics and

¹ [https://www.registrofohio.state.oh.us/pdfs/111/3/11/111\\$3-11-01 PH RV N RU 20240405 1406.pdf](https://www.registrofohio.state.oh.us/pdfs/111/3/11/111$3-11-01 PH RV N RU 20240405 1406.pdf)

² <https://codes.ohio.gov/ohio-revised-code/section-3505.183>

³ <https://www.ohiosos.gov/globalassets/elections/directives/2023/eom/dir2023-24-ch04.pdf>

⁴ <https://codes.ohio.gov/ohio-revised-code/section-3503.151>

Archive. The DATA Act required the creation of additional standard definitions that must be utilized by all 88 county boards of elections in the processing, retention, and reporting of election-related records to the Secretary of State.

The Office of Data Analytics and Archives began a pilot program in May of this year to assist county boards of elections with this effort. The program provided six boards with county-specific digital dashboards to help election officials more efficiently identify voter registration discrepancies that require additional review and possible correction. These dashboards show the number of registration records flagged for additional review, such as illegal characters in name fields, placeholder birth dates, unreasonably high ages, and improper birth/registration date combinations. The dashboards also display data unique to each county and allow boards of elections to correct inaccurate data quickly and easily. After successful testing by the six pilot counties, our office is now deploying this program to all remaining county boards of elections with the goal of helping boards meet their obligations to correct inaccurate voter registration data as outlined in [Chapter 4, pages 127-128 of the Election Official Manual](#).

Using the new Registration Audit Dashboard, below is a list of the checks that county boards of elections are required to review and resolve.

PROHIBITED NAME CHARACTERS

Chapter 4 of the Election Official Manual⁵ lists data entry standards for voter names, including a list of characters that are not permitted in name fields such as hyphens, apostrophes and periods. The dashboard flags voter names containing these characters for correction by the Board of Elections. Prohibited characters must be removed from voter names according to the procedures described in the EOM Data Entry Standards.

INCONSISTENT BIRTHDATES AND REGISTRATION DATES

Date of Birth is one of the key pieces of identifying information provided by voters. It is important that voter dates of birth are recorded accurately. Registration Date now has a standard definition.⁶ Generally speaking, registration dates should be the initial date the voter became registered to vote in Ohio.

The dashboard flags voter records with inconsistencies identified in the Date of Birth and the Registration Date. These inconsistencies almost certainly stem from data entry errors or incorrect values in the voter record for these dates. Research will be necessary to determine the correct values, including direct voter contact by email, phone, or other method convenient to the voter. Four different issue types are currently flagged:

- **Placeholder Birth Date:** The voter's Birth Date has the "placeholder" value of January 1, 1800.⁷ This anomaly was explained earlier in this directive.

⁵ <https://www.ohiosos.gov/globalassets/elections/directives/2023/eom/dir2023-24-ch04.pdf>

⁶ <https://codes.ohio.gov/ohio-revised-code/section-3503.15>

- **Registration Before Birth:** The voter's Registration Date is earlier than their Birth Date, indicating they registered to vote before they were born. This likely represents an errant data entry in need of additional research and correction.
- **Registration Under 17:** The voter's Registration Date is less than 17 years after their Birth Date, indicating they registered to vote before they were 17 years old. This likely represents an errant data entry in need of additional research and correction.
- **Unreasonably High Age:** The voter's age is 110 years old or greater according to their Birth Date. The oldest documented living American is 114; therefore, this likely represents an errant data entry in need of additional research and correction.

In each case, the board of elections must research the voter record to determine whether it contains the correct values for the voter's Birth Date and initial Registration Date. The board of elections must use any filings made by the voter, including registration cards, absentee ballot applications, provisional ballot envelopes, or copies of government-issued identification cards to determine the correct values. The board of elections may refer to outside data sources to assist in its research, such as the Vital Statistics report published by DataOhio. The Secretary of State's Office may provide additional data points for review and correction. Again, direct voter contact by email, phone, or other method convenient to the voter may be necessary to obtain accurate information.

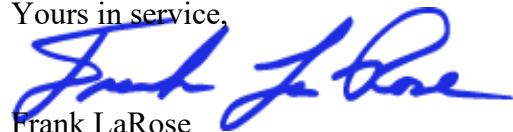
REQUIREMENTS

Boards of elections must regularly access the Registration Audit Dashboard, at least once per work week, and take action to correct any flagged voter records that appear.

By August 1, 2024 boards of elections must maintain their voter registration databases to ensure that the percentage of flagged voter records does not exceed 0.1% of the total number of voter records in Active and Active-Confirmation status. In the event the percentage of flagged voter records exceeds 0.1%, the Boards of Elections shall submit a plan to the Secretary of State's office and strive to reduce the percentage of flagged voter records to the stated threshold.

This office, in partnership with Ohio's 88 county boards of elections, has a duty under the law to maintain accurate voter rolls, and that requires constant vigilance. Our Elections and Data Analytics teams standby ready to assist you in this effort. If you have any questions, please contact Laura Davis, in our Elections Division, at (614) 696-8885 or ldavis@ohiosos.gov.

Yours in service,



Frank LaRose
Ohio Secretary of State