

DIRECTIVE 2025-52

September 15, 2025

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

Re: Voter Registration Data Integrity – Updating Missing Data

SUMMARY

Ohio law requires the Secretary of State and the 88 county boards of elections to “maintain the accuracy of the statewide voter registration database.”¹ In 2023, I worked with the Ohio General Assembly to pass the DATA Act, the first effort by any state in the nation to modernize the definition and retention of voter data. This new law established the first full-time Office of Data Analytics and Archives under the Secretary of State’s oversight, and the data team now assigned to that office began a statewide effort to standardize and improve the process of voter list maintenance across all counties.

To support these efforts, the Office of Data Analytics and Archives undertook an effort to ensure compliance with [Section 4.11 of the Election Official Manual](#), which requires boards of elections to complete and update voter registrations with missing data matched in Ohio Bureau of Motor Vehicles (BMV) records.² As a result of the review, the data team identified voter registration records missing last four of Social Security number (SSN4) and driver license number or identification number. As a result, this directive instructs boards to comply with [Section 4.11 of the Election Official Manual](#) by:

- 1) Updating incomplete voter registration records,
- 2) Researching possible match-pairs,
- 3) Mailing a notice to the voter registration records with the remaining incomplete SSN4 and driver license or identification number, and
- 4) Removing Duplicate Voter Registration Records.

INSTRUCTIONS

Incomplete Voter Registration Records

The matching of BMV records to the statewide voter registration database resulted in three categorical match pairs: pre-match pairs, possible-match pairs, and no-match pairs. Each of the

¹ [R.C. 3503.151](#).

² [52 U.S.C. § 21803](#) and [R.C. 3503.14](#).

three categorical results of incomplete voter registration records requires a different action by the board, and the instructions are as follows:

1. Pre-Match Pairs Requiring Mandatory Completion

The Secretary of State's office will upload a list of voters to **SharePoint > Voter Registration Data Integrity > Pre-Match Pairs** whose records either have a missing BMV ID or SSN4 in the SWVRD. The boards of elections must work with their county voter registration vendor to bulk upload pre-match pairs that require mandatory completion as described in [Section 4.11: Pre-Match Pairs Requiring Mandatory Completion](#) of the Election Official Manual.

Note: Voter registration records must not be assigned voter-initiated activity, and any records in Confirmation status must not be updated to Active status as a result of this information update.

There are two categories for pre-match pairs missing information:

- A. BMV ID is blank in the SWVRD record, and the match-pairs match exactly on SSN, DOB, and First and Last Name; or
- B. SSN4 is blank in the SWVRD record, and the match-pairs match exactly on BMV ID, DOB, and First and Last Name.

Files containing these pre-match pairs will be uploaded to the SharePoint in the same file format as the BMV_UPDATE files that are posted to the BOE Portal. Boards must access the files from SharePoint and work with their voter registration system vendor to bulk upload them into the county voter registration system. The file format is as follows:

The File Name will be in the format COUNTYNAME_BMV_UPDATE_DIRECTIVE_2025_52 The file will contain the following fields:

- BMV_LICENSE_NUMBER
- BMV_SSN4
- BMV_DOB
- BMV_LNAME
- BMV_FNAME
- SOS_VOTER_ID
- SOS_COUNTY_VOTER_ID
- SOS_BMV_ID
- SOS_SSN4
- SOS_DOB
- SOS_LNAME
- SOS_FNAME

- SOS_MATCHING_DESCRIPTION
- UPDATE_REQUIRED_FIELDS

For every BMV-SWVRD pre-matched record in which the SWVRD BMV ID or SWVRD SSN4 field is blank, board staff must complete the voter record in the county voter registration system and the SWVRD with the missing information provided.

If the field that was missing information is no longer blank at the time of processing, the board must not overwrite the information contained in the voter registration record. **This work must be completed within 10 days of receipt of the file from the Secretary of State.**

2. Possible Match-Pairs

The boards of elections are instructed to access additional possible-match pairs through the “BMV Missing” Registration Audit Dashboard on the BOE Portal. These voter records are missing both the BMV_ID and the SSN4. Potential matches were generated using First Name, Last Name, Date of Birth, and either Middle Initial or House Number and Zip Code. Boards must review the dashboard to confirm and verify that the records represent the same person. If so, board staff must complete the voter record in the county voter registration system and the SWVRD with the missing information provided.

Note: Voter registration records must not be assigned voter-initiated activity, and any records in Confirmation status must not be updated to Active status as a result of this information update.

Further instructions regarding the possible match-pair review will be available on the Registration Audit Dashboard. **This work must be completed by September 26, 2025.**

If, after reviewing the records, the board cannot verify and confirm the voter registration information, the board is required to follow the instructions under “**No-Match Pairs**” immediately below.

3. No-Match Pairs

The Secretary of State’s office will upload a list of voters to **SharePoint > Voter Registration Data Integrity_No-Match Pairs** whose records did not have SSN4 and driver license number and could not be matched to a BMV record. Because the voter registration is incomplete, the board must place the voter in Confirmation status and send [Form 10-E Voter Information Confirmation Notice – Missing Voter Information](#), notifying them that their voter registration record is incomplete and they will be required to provide proof of identity prior to voting in a future election.³

³ [52 U.S.C. § 21803](#) and [R.C. 3503.14](#).

Removal of Duplicates Voter Registration Records

After the board works with its voter registration database vendor to bulk upload records or completes a manual review of records in the data discrepancy dashboard, the board must review its records for duplicates and merge them to ensure that duplicate levels do not exceed 0.03 percent on a rolling monthly basis and do not exceed zero percent by **October 21, 2025**.

GRANT FUNDING

The Ohio Secretary of State is providing grant funding in the amount of \$4,300 to assist with expenses associated with implementing this directive. **The grant agreement must be returned to KSchrock@OhioSoS.gov at the Secretary of State's office by September 26, 2025.**

MAILING INSTRUCTIONS

The boards of elections may use grant funding appropriations for various actions relating to list maintenance efforts, as described in the Voter Registration Data Integrity Grant Funding Agreement. **Each board must mail all notices no later than October 3, 2025**, using the prescribed forms, including a postage-paid return envelope with [Form 10-E Voter Information Confirmation Notice – Missing Voter Information](#). Boards must also record in its voter registration system the date the notice is mailed to an elector and, when applicable, the date the board receives a response to the mailing or the date the notice is returned undeliverable.

If the board has a business reply permit, it must use the permit to utilize grant funding to carry out the instructions of this directive. If the board of elections does not have a business reply permit, it may accept grant funding and use it to obtain one.

If you have any questions about this directive or need assistance, please contact Intake@OhioSoS.gov or 614-728-8789.

Yours in service,



Frank LaRose
Ohio Secretary of State