

DIRECTIVE 2025-31 GENERAL VOTER RECORDS MAINTENANCE PROGRAM

July 28, 2025

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

Re: 2025 General Voter Records Maintenance Program

SUMMARY

Maintaining accurate voter registration rolls is critical to ensuring elections are secure. This directive provides instructions to boards of elections for the National Change of Address (NCOA) and Supplemental Process components of the 2025 General Voter Records Maintenance Program.

This uniform and nondiscriminatory program is designed to ensure that accurate and current voter registration rolls are maintained. Voters who likely moved are proactively contacted and given the opportunity to update their voter registration. The process also seeks to identify those who may no longer be qualified electors under the law and provides proper legal notice that their voter registration will be canceled if they do not engage in any voter-initiated activity.

BACKGROUND

The General Voter Records Maintenance Program is a requirement of the National Voter Registration Act of 1993 (NVRA),¹ commonly referred to as the “motor voter law” that was signed into law on May 20, 1993. The purposes of the NVRA are to increase the number of voter registrations for eligible citizens, to enhance the participation of eligible citizens in the voter process, to protect the integrity of the electoral process, and to ensure that accurate and current voter registration rolls are maintained.²

Following the passage of the NVRA, the Ohio General Assembly enacted Substitute Senate Bill 300 to incorporate the federal law requirements into Ohio law. Thus, since 1995, state law has required local election officials to conduct the state’s general voter

¹ [52 U.S.C.A. §20507.](#)

² [52 U.S.C.A. §20507\(b\).](#)

records maintenance program every year.³ There are two parts of Ohio's implementation of the general voter records maintenance program:

- **The NCOA Process**, which compares boards of elections' voter rolls with the United States Postal Service (USPS) NCOA database to identify electors who have moved since the records were last compared in 2024 and thus may need to update their voter registrations to their current voting residence address. Under state law, the Secretary of State's office matches voter records in the Statewide Voter Registration Database against the NCOA database to compile the data for the NCOA Process.⁴
 - A voter identified through the NCOA process as moving In-County has their voting address automatically updated to their new address.
 - A voter identified as moving Out-of-County is sent a notice and flagged for removal after four additional years of no voter activity.
- **The Supplemental Process** is triggered by a voter's inactivity during a fixed period, generally two years. This process seeks to identify electors whose lack of voter-initiated activity indicates they may have moved, even though their names did not appear as part of the NCOA Process. County boards of elections use voter activity in their local voter registration system to compile the data for the Supplemental Process. Generally, the process *begins* after two years of voter inactivity, and the voter has an additional four years, for a *total of six years of no voter activity*, before their registration is canceled.

Voter registrations will not be canceled pursuant to the 2025 Out-of-County NCOA Process or Supplemental Process until four years after a confirmation notice is sent. A registration will be canceled only if the voter fails to respond to the notice or engage in any other voter-initiated activity during a period of four consecutive years, including two federal general elections.

INSTRUCTIONS

The following sections outline steps each board of elections must take in preparation for the 2025 General Voter Records Maintenance Program. **Boards must complete the**

³ [R.C. 3503.21\(D\)](#).

⁴ [R.C. 3503.21](#).

NCOA Process prior to identifying records that are a part of the Supplemental Process.

I. PREPARATION STEPS FOR THE 2025 GENERAL VOTER RECORDS MAINTENANCE PROGRAM

Before beginning the NCOA In-County, Out-of-County, or Supplemental Process, each board of elections must do the following:

- Complete the local data entry of all voter registration applications, including any information from provisional ballot envelopes cast in the May 6, 2025 Primary/Special Election.
- Update all voter registration records to account for voter-initiated activity, as necessary. 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.⁵
- Retrieve and review the “Automatic Confirmation of Address Safeguard” file from the Boards of Elections Portal and update any record in “active-confirmation” status to “active-active” status.⁶

II. AUTOMATIC ADDRESS UPDATE FOR IN-COUNTY NCOA MOVES⁷

Under federal law, a voter identified through the NCOA process as moving in-county must have their voting address updated to their new address. Below are the steps boards must complete for registered voters identified as having an in-county NCOA move.

Step 1: Accessing In-County Data

Boards of elections will access their 2025 In-County data file through the Boards of Elections Portal. The Secretary of State will make these files available not later than August 1, 2025. An email will be sent from the Elections Division when files are available.

Step 2: In-County NCOA Voter Registration Updates

Boards of elections must update voter records on the In-County NCOA list:

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

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

⁷ [52 U.S.C.A. §20507\(c\)\(1\)\(B\)\(i\).](#)

1. Update the voter's registration address to the address in the 2025 In-County NCOA file.
2. Place or keep the voter in "active-active" status.

Step 3: NCOA In-County Data File Creation

Before sending any notices, each board of elections must compile a data file containing voters identified through the NCOA In-County process and provide this list to the Secretary of State's office.

Boards of elections must ensure that voter records that will receive a [Secretary of State Form 10-S-In County NCOA](#) – Acknowledgement Notice of Voting Address Update Due to In-County Move under the NCOA In-County Process meet **all the following criteria**:

- Voter is registered in the county and is listed under the NCOA In-County file under a new address.

To submit the list of voters identified through the NCOA In-County Process, all boards must submit a spreadsheet in the same format containing the following information:

- county number
- county name
- state voter ID
- confirmation reason (NCOA In-County)
- registration date
- last voted date
- first name
- last name
- address
- address line 2
- city
- state
- zip code
- voter status

Boards of elections may upload the spreadsheet starting August 4, 2025. One spreadsheet may be submitted that includes NCOA In-County, Out-of-County, and Supplemental data. However, the confirmation reason must list which process the record

was identified under. The spreadsheet must be uploaded to the board's SharePoint folder in a .csv format by **noon on August 14, 2025**.

The Secretary of State's office will review the data. After the file has passed the necessary data checks, each board of elections will receive an email instructing it to mail out the notices. **Boards must wait for the email from the Secretary of State's office before mailing any notices related to the In-County NCOA Process.**

Step 4: Mailing In-County NCOA Notices

If the address provided on the In-County NCOA list already matches the voter's address in the voter registration system and the voter is in "Active-Active" status, the board does not need to send a notice to the voter. If the address provided on the In-County NCOA list is not within the county, the board must follow the Out-of-County NCOA instructions below and ensure those records are noted as Out-of-County in the confirmation notice file.

Each board must mail the [Secretary of State Form 10-S-In County NCOA](#) – Acknowledgement Notice of Voting Address Update Due to In-County Move for those records that are identified as part of the In-County NCOA Process, no later than **Friday, August 22, 2025**. Boards must use the prescribed form, and notices must be sent by forwardable mail using the United States Postal Service. Boards must use a business reply mail permit unless the use of the permit is not cost-effective. Boards must also record in their voter registration system the date the acknowledgement notice is mailed to an elector and, when applicable, the date the board receives a response to the notice or the date the notice is returned undeliverable.

Whenever an Acknowledgement Notice is returned to the board as undeliverable, the board must investigate and, if the notice was sent to an incorrect address, send it to the correct address. If the board is unable to verify the voter's correct address, it must change the assigned voter status for that voter from "Active" to "Inactive" (or "Active-Confirmation") and issue [Confirmation Notice 10-S-1](#) by forwardable mail.

See Section IV: Mailing Notices Under the 2025 General Voter Records Maintenance Program on page 8 for additional requirements.

III. NCOA OUT OF COUNTY AND SUPPLEMENTAL CONFIRMATION NOTICES

A. DATA COLLECTION AND REVIEW OF RECORDS - PRIOR TO MAILING THE CONFIRMATION NOTICES

Step 1: Accessing Out-of-County NCOA Data

Boards of elections will access their 2025 Out-of-County NCOA data file through the Boards of Elections Portal. The Secretary of State will make these files available not later than August 1, 2025. An email will be sent from the Elections division when files are available.

Step 2: Out-of-County NCOA Voter Registration Updates

Boards of elections must update voter records on the Out-of-County NCOA list and place the voters in "Active-Confirmation" status in the board's voter registration system. Each board must ensure that the status of the voter is properly updated in the Statewide Voter Registration Database. Voters should not receive voter activity for this change.

Step 3: NCOA Out-of-County and Supplemental Data File Creation

Before sending any confirmation notices, each board of elections must compile a data file containing voters identified through the NCOA Out-of-County and Supplemental processes and provide this list to the Secretary of State's office. **Do not place Supplemental voters into "Active-Confirmation" status in the county voter registration system before receiving emailed approval from the Secretary of State's office.**

A. Identifying Out-of-County Records

Before sending any notices, each board of elections must compile a data file containing voters identified through the NCOA Out-of-County process and provide this list to the Secretary of State's office.

Boards of elections must ensure that voter records that will receive a [Secretary of State Form 10-S-Out of County NCOA](#) meet **all the following criteria**:

- Voter is registered in the county and is listed under the Out-of-County NCOA file under a new address in another county.

B. Identifying Supplemental Records

Boards of elections must ensure that voter records that will receive a confirmation notice under the Supplemental Process meet **all the following criteria**:

- The voter record is in "Active-Active" status

-OR-

The voter record is in "Active-Confirmation" status, the most recent confirmation notice was mailed prior to January 7, 2023, and does not appear on the 2025 Registration Readiness list.

- The voter's registration date is before May 2, 2023.
- The voter's record does not contain voter-initiated activity on or after May 2, 2023. 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.
- The voter does not appear on the "Automatic Confirmation of Address Safeguard" list on the Boards of Elections Portal.

To submit the list of voters identified through the Out-of-County NCOA and Supplemental Processes, all boards must submit a spreadsheet in the same format containing the following information:

- county number
- county name
- state voter ID
- confirmation reason (NCOA Out-of-County or Supplemental)
- registration date
- last voted date
- first name
- last name
- address
- address line 2
- city
- state

- zip code
- voter status

Boards of elections may upload the spreadsheet starting August 4, 2025. One spreadsheet may be submitted that includes NCOA In-County, Out-of-County, and Supplemental data. However, the confirmation reason must list which process the record was identified under. The spreadsheet must be uploaded to the board's SharePoint folder in a .csv format by **noon on August 14, 2025**.

The Secretary of State's office will review the data. After the file has passed the necessary data checks, each board of elections will receive an email instructing it to proceed with the NCOA Out-of-County and Supplemental Processes and mail out the confirmation notices for voters identified in the NCOA Process and Supplemental Process. **Boards must wait for the email from the Secretary of State's office before mailing any confirmation notices related to the NCOA Process or Supplemental Process.**

Step 4: Supplemental Voter Registration Updates

After receiving approval from the Secretary of State's office, boards of elections must update voter records on the Supplemental lists and place the voters in "Active-Confirmation" status in the board's voter registration system. Each board must ensure that the voter's status is properly updated in the Statewide Voter Registration Database. Voters should not receive voter activity for this change.

IV. MAILING NOTICES UNDER THE 2025 GENERAL VOTER RECORDS MAINTENANCE PROGRAM

Whether printing notices in house or with a vendor, each board of elections must create a proofing process and carefully review the data (e.g., name, address, etc.) and its proper placement on the notice. Each board must also review [Chapter 4, page 133 of the Election Official Manual](#) to ensure outside print and mail vendor compliance.

All boards of elections must mail notices to electors identified through Ohio's 2025 General Voter Records Maintenance Program. There are three types of notices used in the NCOA Process and Supplemental Process:

- [Secretary of State Form 10-S-In County NCOA](#) must be used for those records that are identified as part of the **In-County NCOA Process**.

- [Secretary of State Form 10-S-Out of County NCOA](#) must be used for those records that are identified as part of the **Out-of-County NCOA Process**.
- [Secretary of State Form 10-S-Supplemental](#) must be used for those records that are identified as part of the **Supplemental Process**.

Each board must mail all notices no later than **Friday, August 22, 2025**, using the prescribed forms, including a postage-paid return envelope with the notification form.⁸ Boards must use a business reply mail permit unless using the permit is not cost-effective. Boards must also record in their 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. **This record is critical to establishing the four-year anniversary date for each notice.**

A. Mailing In-County and Out-of-County NCOA Notices

Notices are always mailed to the address that appears on the 2025 NCOA list for the voter. However, to prevent confusion, regardless of the address to which the notice is mailed, the front, preprinted side of [Secretary of State Form 10-S-Out of County NCOA](#) and [Secretary of State Form 10-S-In County NCOA](#) must include *only* the address at which the elector is registered to vote. That is the address the voter is being asked to confirm.

- For [Secretary of State Form 10-S-In County NCOA](#) (In-County NCOA Process), print the address that appears in the in-county NCOA file for that elector since the board has updated the voter's registration address to the new address in the same county.
- For [Secretary of State Form 10-S-Out of County NCOA](#) (Out-of-County NCOA Process), print the address that appears in the board's voter registration system for the elector.

Print the address to which the notice must be mailed as provided by the NCOA list on the letter side of the notice. In addition, place the board's name and return address at the top left corner of the letter side.

⁸ [R.C. 3503.21\(D\)](#).

B. Mailing the Supplemental Confirmation Notices ([Secretary of State Form 10-S-Supplemental](#))

After the board has received confirmation that it may proceed, the board must:

- 1) Place the elector in “Active-Confirmation” status.
- 2) Send the confirmation notice by forwardable mail to the voter’s current address (as recorded on the board of elections voter registration record).
- 3) For [Secretary of State form 10-S-Supplemental](#) (Supplemental Process), print the address that appears in the board’s voter registration system for the elector.

V. DATA COLLECTION AND REVIEW – AFTER MAILING THE CONFIRMATION NOTICES

Each board of elections must submit a “NCOA and Supplemental notice file” to the Secretary of State’s office. Boards must generate this file the day that notices are mailed. The board of elections must upload the spreadsheet containing registration records that received each type of notice by **Friday, August 29, 2025** (In-County NCOA, Out-of-County NCOA, and Supplemental). Note that every record on the spreadsheet must have received a notice.

All boards must utilize the same spreadsheet format provided above. The spreadsheet must be uploaded to the board’s SharePoint folder in a .csv format. The Secretary of State’s office will review the data for any issues that may exist and will perform outreach with a board of elections if such issue is detected. Each board will review any potential discrepancies and provide a summary of its findings.

VI. RESPONSES TO THE CONFIRMATION NOTICE MAILING

An elector may respond to the notice online or by returning the notice to confirm or update their voter registration address. Note that if the elector does not respond to the in-county acknowledgement notice, their status will remain “Active-Active.”

A. Response to Notice with Change of Address Within the County

If the elector provides a new residential address within the county, the board of elections must update the elector’s registration record with the new address as of the date provided by the online voter registration system or the date of receipt of the mailed-in notice from the elector. The board must send the elector an acknowledgment notice ([Secretary of State Form 10-J](#)) informing the elector of the registration update

and the location of their new polling place. The board must place or keep this elector as "Active-Active" in its voter registration database.

B. Change of Address to Another Ohio County

If the elector provides a new residential address in another Ohio county using the online voter registration system, the board of elections in the elector's new county must accept the elector into its voter registration system using the date provided by the online voter registration system as the elector's registration date in that county.

The board of the new county must send the elector an acknowledgment notice ([Secretary of State Form 10-J](#)) informing them of the registration update and location of their new polling place. Update this elector as "Active-Active" in the board's voter registration database.

A duplicate record will be created in the statewide voter registration database between the elector's new and former counties that must be promptly resolved following the normal business procedures established by the Secretary of State's office and the county boards of elections.

If the elector returns the confirmation return notice by mail and provides a new residential address in another Ohio county, the board of elections that originally mailed the confirmation notice must keep a copy of the completed confirmation return notice and mail the original to the elector's new county board of elections, and the new board will enter the elector into its voter registration database as an active voter. Completed confirmation notices returned under this section must be forwarded to the appropriate board of elections at least every week.

After the board of elections for the new county has entered the record into its county voter registration database, a duplicate record will be created in the statewide voter registration database that must be promptly resolved following the normal business procedures established by the Secretary of State's office and the county boards of elections.

C. Change of Address to Another State

If an elector completes and returns the confirmation notice and provides a new residential address in a different state, the board of elections that originally mailed the confirmation notice must cancel the elector's registration in that county and make a notation on the elector's registration record of the date the confirmation return notice

was received and the date of cancellation.⁹ The online voter registration system does not permit the user to provide a new permanent residential address outside the state of Ohio.

D. Verification of Current Address

If the elector verifies they reside at the same address on file with the board of elections using the online voter registration system or returns the notice by mail, the board must indicate on the elector's registration record the date that notice was received by the board and note that the address on file with the board of elections is correct. The board must place or keep this elector as "Active-Active" in its voter registration database.

E. Confirmation Notice NOT Returned

1. In-County NCOA Process

If the elector fails to return the notice and otherwise fails to engage in any voter-initiated activity, the elector must continue to be listed as "Active-Active" in the county's voter registration database.

2. Out-of-County NCOA and Supplemental Processes

If the elector fails to return the confirmation notice and otherwise fails to engage in any voter-initiated activity, the elector must continue to be listed as "Active-Confirmation" in the county's voter registration database.

Unless and until the elector's registration is canceled as described below, or as otherwise permitted by law, the elector maintains all the rights of an otherwise qualified elector, subject to Ohio's laws governing provisional voting.

F. Handling "No Forwarding Address" Returns

1. In-County NCOA Process

In-county notices must be sent by forwardable mail. If the USPS returns a [Secretary of State Form 10-S-In County NCOA](#) notice that is undeliverable, the board of elections must issue a [Secretary of State Form 10-S-1](#) confirmation notice to the voter by forwardable mail.

⁹ [R.C. 3503.02](#) and [3503.21](#).

2. Out-of-County NCOA and Supplemental Processes

Confirmation notices must be sent by forwardable mail. However, the USPS sometimes will return to the board of elections a confirmation notice that is undeliverable because the USPS does not have a forwarding address for the elector. The board must record that fact in the comments section of that elector's record and keep the undeliverable confirmation notice for four years.

VII. PROSPECTIVE NATURE OF THE 2025 GENERAL VOTER RECORDS MAINTENANCE PROGRAM

The elector's voter status must be changed from "Active-Confirmation" to "Active-Active," and the elector must not be canceled pursuant to the 2025 NCOA and Supplemental Process if any of the following apply:

- The elector responds to the 2025 confirmation notice (either via mail or online).
- The elector updates their voter registration or engages in voter-initiated activity. 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.
- The elector appears on the county's "Automatic Confirmation of Address Safeguard" list.

All other electors contacted pursuant to the 2025 NCOA Process and Supplemental Process must be canceled by one of the following dates, whichever is later:

- Not later than 120 days after the date of the second federal general election (**November 7, 2028**) in which the elector fails to vote.
- Not later than 120 days after the expiration of the four-year period that begins on the date the confirmation notice is mailed pursuant to this directive.
- **No voter registration may be canceled as a result of the general voter records maintenance program during the 90 days immediately preceding any federal primary or general election.¹⁰**

¹⁰ [52 U.S.C.A. §20507\(c\)\(2\)\(A\).](#)

VIII. MAINTAINING RECORDS FOR PUBLIC INSPECTION AND COPYING

The board 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 voter registration lists, including the names and addresses of all registered electors sent confirmation notices and whether or not the elector responded to the confirmation notice. The board must maintain all records described in this paragraph for a period of five years.¹¹ Boards of elections must make the list (in electronic form) available to individuals requesting the data under Ohio's public records laws.¹²

IX. "ACTIVE-CONFIRMATION" STATUS AND VOTING

As a reminder, a voter placed in "Active-Confirmation" status under the General Voter Records Maintenance Program must appear in the poll list at the polling place where the voter is registered to vote and should not be flagged to cast a provisional ballot (unless flagged for some other reason). The presence of an "Active-Confirmation" status on a voter registration is not an indicator that the record is "incomplete," "unverified," or otherwise unqualified to vote. Rather, it designates that the registrant has been inactive during a fixed period of time, generally two years, and has not responded to a confirmation notice.

If a voter placed in "Active-Confirmation" status appears at the voter's assigned polling place to vote, states to the precinct election officials that the voter resides at the same address printed in the poll list, provides valid identification for voting purposes, and is not required to cast a provisional ballot for any other reason, the voter must be permitted to cast a regular ballot.¹³ If a voter placed in "Active-Confirmation" status submits an application for an absentee ballot, provides the same address on the application at which the voter is registered to vote, and the application is in all other respects complete and valid, the board must issue the absentee ballot to the voter (whether by mail or in person).¹⁴

¹¹ [52 U.S.C.A. §20507\(i\)](#); [R.C. 3503.26\(B\)](#); CBE-45A & CBE-46, [Secretary of State Retention Schedule](#).

¹² CBE-46, [Secretary of State Retention Schedule](#).

¹³ [R.C. 3505.18\(B\)](#) and [R.C. 3505.181](#).

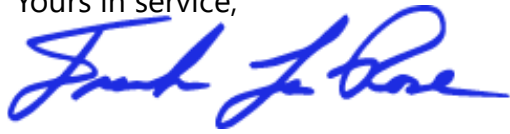
¹⁴ [R.C. 3509.03](#).

X. POSTAL INFORMATION

To reduce mailing costs and save taxpayer funds, boards of elections must consult with their local postmaster or regional business mail analyst regarding the use of nonprofit permit postage rates for the mailing of outbound confirmation notices and business reply mail permits for the return of completed confirmation notices from electors. Both permitting methods have an application process, so boards should evaluate these options as quickly as possible. Boards must use a business reply mail permit unless the use of the permit is not cost-effective. The Secretary of State's office will be hosting webinars to assist with this process.

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