



DIRECTIVE 2021-16

June 4, 2021

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

Re: Data Collection, Notice, and Cancellation Procedures for Completion of 2017 National Change of Address (“NCOA”) Process

BACKGROUND

[Directive 2017-03](#) instructed all boards of elections to mail confirmation notices to electors identified pursuant to the 2017 National Change of Address (“NCOA”) process. The Directive required boards to mail the confirmation notices between February 21, 2017 and March 10, 2017. The mailing of confirmation notices in 2017 started the four-year period that precedes cancellation pursuant to the NCOA process.

State and federal law require maintaining accurate voter registration records. The Secretary of State is committed to giving all eligible voters the opportunity to maintain an active registration status. Therefore, this Directive requires each county board of elections to provide a list of registrations in active-confirmation status as a result of the 2017 NCOA process 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.

No voter registrations will be cancelled before the November 2, 2021 General Election as a result of the state’s general voter records maintenance program. This Directive requires the boards of elections to send a registration readiness notice ([Secretary of State Form 255-A-3 – Updated 6-21](#)) to each registration that is in active-confirmation status as a result of the NCOA process conducted in 2017.

After the November 2, 2021 General Election, boards must provide a pre-cancellation list, but only after (1) uploading all voter history from the general election and (2) processing voter registration transactions pending after the election. Cancellations will occur in the first week of January. Further instructions are provided below.

INSTRUCTIONS

I. REGISTRATION READINESS NOTICES PURSUANT TO 2017 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. Process all outstanding voter registration transactions by the close of business on June 16, 2021.
2. Resolve all outstanding duplicate registrations by the close of business on June 18, 2021.

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. No earlier than June 24, 2021, boards may resume processing voter registration transactions received after June 16, 2021.

On the day shown below, boards of elections must upload the spreadsheet containing the registration records that will receive the registration readiness notice:

- June 21, 2021: Adams through Guernsey
- June 22, 2021: Hamilton through Muskingum
- June 23, 2021: Noble through Wyandot

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

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 2017 NCOA process.
- The record appears on the 2017 Out-of-County NCOA list.
- The record's registration date is before February 21, 2017.

- The record does not contain voter history on or after May 2, 2017.
- 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 an 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.

Boards must not include on the list or send a registration readiness notice to any registration that appears on the “do not cancel” spreadsheet accompanying this Directive. 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 6-21](#)) to each registration that meets the criteria above. Each board must finish mailing the notices by July 2, 2021. 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.

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.

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

II. CANCELLATIONS PURSUANT TO THE 2017 NCOA PROCESS

Boards of elections are prohibited from cancelling any voter registration pursuant to the 2017 NCOA process prior to the November 2, 2021 General Election. The following instructions are for the period after the November 2, 2021 General Election, preceding any cancellation.

A. PRE-CANCELLATION SPREADSHEET

Before completing any cancellations pursuant to the 2017 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. Process all voter registration transactions received by the close of business on December 10, 2021.

2. Resolve all outstanding duplicate registrations by the close of business on December 14, 2021.

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. No earlier than December 20, 2021, boards may resume processing voter registration transactions received after December 10, 2021.

On the day shown below, boards must upload the spreadsheet containing the records of registrations that are pending cancellation pursuant to the 2017 NCOA process:

- December 15, 2021: Adams through Guernsey
- December 16, 2021: Hamilton through Muskingum
- December 17, 2021: Noble through Wyandot

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 2017 NCOA process.
- The record appears on the 2017 Out-of-County NCOA list.
- The record's registration date is before February 21, 2017.
- The record does not contain voter history on or after May 2, 2017.
- 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 an 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 record appears on the registration readiness notice spreadsheet.

Boards are prohibited from cancelling any registration that appears on a "do not cancel" spreadsheet from the Secretary of State's Office.

B. CANCELLATION SPREADSHEET

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. All identified records must be cancelled by January 7, 2022.

Boards of elections must not cancel any registration pursuant to the 2017 NCOA process to which any of the following apply:

1. The registration appears on the "do not cancel" list accompanying this Directive;
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 2, 2017 through the November 2, 2021 General Election; or

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

On the day shown below, boards must upload the spreadsheet containing the registrations that received the registration readiness notice and were cancelled:

- January 10, 2022: Adams through Guernsey
- January 11, 2022: Hamilton through Muskingum
- January 12, 2022: Noble through Wyandot

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 6-21](#)) 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.¹

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

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