



DIRECTIVE 2022-23

February 15, 2022

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

Re: Data Collection, Notice, and Cancellation Procedures for Completion of 2018 National Change of Address (“NCOA”) and Supplemental Process

BACKGROUND

In 2018, the General Voter Records Maintenance National Change of Address (“NCOA”) and Supplemental Processes occurred at different times in that year. [Directive 2018-04](#) instructed all boards of elections to mail confirmation notices to electors identified pursuant to the 2018 NCOA Process between February 20, 2018 and March 7, 2018. [Directive 2018-20](#) instructed all boards of elections to mail confirmation notices to electors identified pursuant to the 2018 Supplemental Process no later than August 6, 2018. The four-year period that precedes cancellation pursuant to the 2018 NCOA and Supplemental Process began when the confirmation notices were mailed in 2018.

State and federal law require maintaining accurate voter registration records. The Secretary of State’s Office is committed to encouraging all eligible voters to engage in voter-initiated activity or voting, including responding to the notices and identifying and rectifying data discrepancies. Therefore, this Directive requires each county board of elections to provide a list of registrations in active-confirmation status as a result of the 2018 NCOA and Supplemental 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 2022 Primary 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 2/2022](#)) to each registration that is in active-confirmation status as a result of the 2018 NCOA and Supplemental Process.

After the 2022 Primary Election and per the timelines set forth in this Directive, boards must provide a pre-cancellation list, but only after (1) uploading all voter history from the primary election and (2) processing voter registration transactions pending after the election. Cancellations will occur in two phases as outlined in the instructions below.

INSTRUCTIONS

I. REGISTRATION READINESS NOTICES PURSUANT TO 2018 NCOA AND SUPPLEMENTAL 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 **February 16, 2022**.¹
2. Resolve all outstanding duplicate registrations by the close of business on **February 18, 2022**.

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 **February 25, 2022**, boards may resume processing voter registration transactions received after **February 16, 2022**.

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

- **February 22, 2022:** Adams through Guernsey
- **February 23, 2022:** Hamilton through Muskingum
- **February 24, 2022:** 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 or Supplemental)
- 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:

- If the record is in active-confirmation status as a result of the **2018 NCOA Process**:

¹ [R.C. 3503.10](#)

- The record must be contained on the 2018 Out-of-County NCOA list;
 - The Out-of-County Confirmation Notice must have been mailed no later than March 7, 2018;
 - There must be no voter history on or after May 8, 2018;
 - The registration date is before February 20, 2018;
 - 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 BMV, or signing a candidate or issue petition that is verified by a board of elections²; and
 - The record does not appear on the “Do Not Cancel” list accompanying this Directive.
- If the record is in active-confirmation status as a result of the **2018 Supplemental Process**:
 - The confirmation notice must have been mailed no later than August 6, 2018;
 - There must be no voter history on and after the March 15, 2016 Primary Election;
 - The registration date must be before the March 15, 2016 Primary Election;
 - The record does not contain any voter-initiated activity to the record between the date the confirmation notice was mailed and the date the data is compiled for the mailing of the registration readiness notice; and
 - The record does not appear on the “Do Not Cancel” list 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 2/2022](#)) to each registration that meets the criteria above. Each board must finish mailing the notices by **March 8, 2022**. 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. The board must review and follow the outsourcing required mailings section in [Chapter 2 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

² See Election Official Manual, [Chapter 4, Section 4.01](#).

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 2/2022](#)) and the courtesy reply mail return envelope is properly printed and included in the outbound mailing envelope. This mailing should be organized in a fashion that maximizes the recipients’ desire to read the contents.

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

II. CANCELLATIONS PURSUANT TO THE 2018 NCOA PROCESS

Boards of elections are prohibited from cancelling any voter registration pursuant to the 2018 NCOA Process prior to the 2022 Primary Election. The following instructions are for the period after the 2022 Primary Election, preceding any cancellation.

A. PRE-CANCELLATION SPREADSHEET: 2018 NCOA PROCESS RECORDS

Before completing any cancellations pursuant to the 2018 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 **June 8, 2022**.³
2. Resolve all outstanding duplicate registrations by the close of business on **June 10, 2022**.

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 16, 2022**, boards may resume processing voter registration transactions received after **June 8, 2022**.

On the day shown below, boards must upload the spreadsheet containing the records of registrations that are pending cancellation pursuant to the 2018 NCOA Process:

- **June 13, 2022:** Adams through Guernsey
- **June 14, 2022:** Hamilton through Muskingum
- **June 15, 2022:** 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 2018 NCOA Process.

³ [R.C. 3503.10](#)

- The record appears on the 2018 Out-of-County NCOA list.
- The record’s registration date is before February 20, 2018.
- The record does not contain voter history on or after May 8, 2018.
- 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.⁴
- The record appears on the registration readiness notice spreadsheet.

Boards are prohibited from cancelling any registration that appears on a “Do Not Cancel” list from the Secretary of State’s Office.

B. CANCELLATION SPREADSHEET: 2018 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 cancelling the registrations. The boards must not cancel any registration until receipt of that email. All identified records must be cancelled by **July 1, 2022**.

Boards of elections must not cancel any registration pursuant to the 2018 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 March 15, 2016 through the 2022 Primary 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:

- **July 5, 2022:** Adams through Guernsey
- **July 6, 2022:** Hamilton through Muskingum
- **July 7, 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.

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

III. CANCELLATIONS PURSUANT TO THE 2018 SUPPLEMENTAL PROCESS

Boards of elections are prohibited from cancelling any voter registration pursuant to the 2018 Supplemental process prior to the 2022 Primary Election. The following instructions are for the period after the 2022 Primary Election, preceding any cancellation.

A. PRE-CANCELLATION SPREADSHEET: 2018 SUPPLEMENTAL PROCESS RECORDS

Before completing any cancellations pursuant to the 2018 Supplemental 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 6, 2022**.
2. Resolve all outstanding duplicate registrations by the close of business on **July 8, 2022**.

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 **July 14, 2022**, boards may resume processing voter registration transactions received after **July 8, 2022**.

On the day shown below, boards must upload the spreadsheet containing the records of registrations that are pending cancellation pursuant to the 2018 Supplemental process:

- **July 11, 2022:** Adams through Guernsey
- **July 12, 2022:** Hamilton through Muskingum
- **July 13, 2022:** 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 because of the 2018 Supplemental process;
- The record appears on the 2018 Supplemental list;
- The record’s registration date is before March 15, 2016;
- The record does not contain voter history on or after March 15, 2016;
- 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;⁵ and

- The record appears on the registration readiness notice spreadsheet.

Boards are prohibited from cancelling any registration that appears on a “Do Not Cancel” list from the Secretary of State’s Office.

B. CANCELLATION SPREADSHEET: 2018 SUPPLEMENTAL 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 cancelling the registrations. The boards must not cancel any registration until receipt of that email. All identified records must be cancelled by **August 8, 2022**.

Boards of elections must not cancel any registration pursuant to the 2018 Supplemental 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 March 15, 2016 through the 2022 Primary 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:

- **August 9, 2022:** Adams through Guernsey
- **August 10, 2022:** Hamilton through Muskingum
- **August 11, 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.

⁵ See [Election Official Manual, Chapter 13, Section 13.01](#).

C. APRI EXCEPTION: RECORDS PERTAINING TO THE 2018 SUPPLEMENTAL PROCESS

For the purposes of the 2022 November General Election, a provisional ballot cast during the early in-person absentee voting period or on Election Day by a voter who is not registered to vote in the State of Ohio may be counted if all of the following apply (the “APRI Exception”):

- (1) The individual’s voter registration was cancelled in 2022 (confirmation notice mailed in 2018) pursuant to the Supplemental Process;
- (2) The voter’s provisional ballot affirmation reflects an address within the precinct in which the voter currently resides, and the voter was previously registered to vote within that same county prior to cancellation;
- (3) The board of elections does not have information that the voter was deceased, incarcerated on a felony conviction, or adjudicated as incompetent under Ohio law by a county probate court after the individual’s registration record was cancelled; and
- (4) The voter’s provisional ballot affirmation form and the ballot otherwise comply with all applicable laws and directives.⁶

IV. 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 2/2022](#)) 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.⁷

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

⁶ See Election Official Manual, [Chapter 8](#).

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