



DIRECTIVE 2022-35

May 28, 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

Earlier this year, our Office issued [Directive 2022-23](#) to provide instructions for the cancellation of voter records pursuant to the 2018 NCOA and Supplemental Process. Due to the unanticipated August 2, 2022 Primary Election, the deadlines associated with the 2018 NCOA and Supplemental Process must be updated. This Directive serves to adjust the timeframes associated with these procedures.

The Secretary of State is committed to both maintaining accurate voter registration records according to state and federal law and giving all eligible voters the opportunity to maintain an active registration status. **No voter registrations will be cancelled before the November 8, 2022 General Election as a result of the state's general voter records maintenance program.**

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

INSTRUCTIONS

I. CANCELLATIONS PURSUANT TO THE 2018 NCOA AND SUPPLEMENTAL PROCESS

Boards of elections are prohibited from cancelling any voter registration pursuant to the 2018 NCOA and Supplemental Process prior to the November 8, 2022 General Election. The following instructions are for the period after the 2022 General Election, preceding any cancellation.

A. PRE-CANCELLATION SPREADSHEET: 2018 NCOA AND SUPPLEMENTAL PROCESS RECORDS

Before completing any cancellations pursuant to the 2018 NCOA and 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 voter registration forms from all agencies that register citizens to vote and process all voter registration transactions received by the close of business on **December 19, 2022.**¹
2. Resolve all outstanding duplicate registrations by the close of business on **December 23, 2022.**

The board must communicate this December 19, 2022 deadline with each agency responsible for accepting voter registrations forms in the county and receive and process all voter registration forms by this date. Boards may resume processing voter registration transactions on **December 31, 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 and Supplemental Process:

- **December 28, 2022:** Adams through Guernsey
- **December 29, 2022:** Hamilton through Muskingum
- **December 30, 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 as a result of the **2018 NCOA Process** must meet the following data conditions:

- The record is in active confirmation status as a result of the 2018 NCOA Process;
- The record appears on the 2018 Out-of-County NCOA list;
- The record's registration date is before March 7, 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;² and
- The record appears on the registration readiness notice spreadsheet.

Each record provided in the spreadsheet as a result of the **2018 Supplemental Process** 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;

¹ [R.C. 3503.10 and 3503.11.](#)

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

- 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;³ and
- 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: 2018 NCOA AND 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 **January 9, 2023**.

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 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, 2023:** Adams through Guernsey
- **January 11, 2023:** Hamilton through Muskingum
- **January 12, 2023:** Noble through Wyandot

The cancellation file format is the same as described above for the pre-cancellation file. The cancellation file must be uploaded to the board’s SharePoint folder in a .csv format.

³ See [Election Official Manual, Chapter 13, Section 13.01](#).

II. MAINTAINING RECORDS OF CANCELLATION

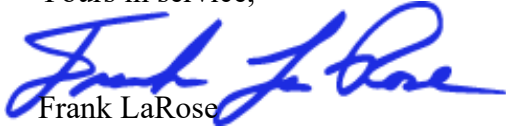
Each board must work with its voter registration vendor to ensure that its county voter registration system maintains and can produce a list of voter registrations cancelled pursuant this Directive. Boards must record all of the following in their county's voter registration system:

- The date that it mailed a registration readiness notice ([Secretary of State Form 255-A-3 – Updated 2/2022](#)) by the **March 8, 2022** deadline contained in [Directive 2022-23](#) 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.⁴

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

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