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DIRECTIVE 2013-08

May 8, 2013

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

Re: Ensuring a More Accurate and Efficient Statewide Voter Registration Database

SUMMARY

This Directive addresses county procedures for the receipt and processing of voter registration database updates from the Bureau of Motor Vehicles, including changes of address as required by the National Voter Registration Act.¹

This Directive replaces [Directive 2012-19](#), which is rescinded.

BACKGROUND

Twenty years ago – almost to the day – the National Voter Registration Act (NVRA) was signed into law. A key component of this federal requirement is that changes of address made by a licensed driver with the Bureau of Motor Vehicles (BMV) must also initiate a change of address for that person on the voter rolls. Despite being federal law since 1993, Ohio was not in compliance with this requirement. After taking office in 2011, my team approached the BMV with a plan to begin getting changes of address. For this process to be accurate and efficient, two key improvements to the Statewide Voter Registration Database (SWVRD) were made.

In 2011, only 20% of the voter records in the SWVRD contained each of the important identifiers (driver license numbers, SSN4 information, and correct dates of birth) that would be necessary to ensure a high level of accuracy to efficiently update BMV changes of address. Since we started providing these data points in May 2012, over five million records have been updated to include driver license numbers, SSN4 information, and correct dates of birth – raising the initial 20% of completed records to 80% in just two years. An important benefit of this enhancement has been the ability to identify additional in-state duplicate records, and because of our combined efforts the 340,000 duplicates that were in the system in 2010 were reduced to only 1,400 by Election Day 2012.

Further, in an effort to utilize technology to provide voters with a convenient and secure way to keep their information up-to-date and to provide an efficient means by which BMV changes of

¹ “Any change of address form submitted in accordance with State law for purposes of a State motor vehicle driver’s license shall serve as notification of change of address for voter registration ... unless the registrant states on the form that the change of address is not for voter registration purposes.” 42 U.S.C. § 1973gg-3(d)

address could be provided to boards of elections – we launched an online change of address system. A critical component of this system was re-tooling the SWVRD to be able to deliver data to the counties in addition to receiving it from the counties. Since this system was launched in August 2012, more than 250,000 addresses have been updated.

Today, we are proud to announce a regular process for exchanging voter information that will make it easier for boards of elections to remain in compliance with the driver's license change of address provisions of federal voter registration laws.

Beginning May 8, 2013, and on at least a twice-weekly basis thereafter, boards of elections will be provided BMV changes of address via the existing online change of address process. Additionally, and on at least a twice-weekly basis thereafter, the files from the BOE portal will begin to include records labeled "BMV COA Review," which are BMV changes of address that require additional research before the board can update the voter's record. The files from the BOE portal will continue to contain "pre-matched" records that require a mandatory completion of the voter's record and "possible-match" records that require research prior to completing the voter's record (as initially prescribed through Directive 2012-19).

Boards of elections will process the bulk of these files immediately (i.e., pre-matched records requiring a mandatory completion from the BOE portal and BMV changes of address from the online change of address system) and then attend to the possible-match records and "BMV COA Review" records (i.e., those requiring research).

All BMV change of address records will contain the date of the transaction at the BMV and should be treated as any other registration (physical card or online change of address).²

INSTRUCTIONS

A. Pre-Matched Pairs Requiring a Mandatory Completion

Under the three enumerated circumstances below, board of elections staff must complete the voter's record in the county voter registration system and the SWVRD with the information from the BMV record that is missing in the SWVRD record, i.e., BMV ID, SSN4, or Date of Birth (DOB).

Boards of elections must download and completely process all pre-matched pairs at least once every work week.

1. **BMV ID Is Blank in the SWVRD Record, and the Record Pairs Match Exactly on SSN4, DOB, and Last Name**

For every BMV-SWVRD pre-matched record in which the SWVRD BMV ID field is blank, and the two records match exactly on SSN4, DOB, and Last Name (regardless

² Regardless of whether the registration is initiated using a physical voter registration card, an online change of address, or comes from the BMV as a result of the NVRA change of address process, if the acknowledgement card issued to the voter by nonforwardable mail is returned as undeliverable, the board must place the voter in confirmation status and issue a confirmation card. R.C. 3503.19(C)(3).

whether the records match on First Name), board staff must immediately complete the voter's record in the county voter registration system and the SWVRD with the BMV ID from the field labeled BMV_LICENSE_NUMBER.

2. SSN4 Is Blank in the SWVRD Record, and the Record Pairs Match Exactly on BMV ID, DOB, and Last Name

For every BMV-SWVRD pre-matched record in which the SWVRD SSN4 field is blank, and the two records match exactly on BMV ID, DOB, and Last Name (regardless whether the records match on First Name), board staff must immediately complete the voter's record in the county voter registration system and the SWVRD with the SSN4 from the field labeled BMV_SSN4.

3. DOB Is Invalid in the SWVRD Record, and the Record Pairs Match Exactly on BMV ID, SSN4 and Last Name

For every BMV-SWVRD matched record in which the SWVRD DOB field is "1/1/1800," and the two records match exactly on BMV ID, SSN4, and Last Name (regardless whether the records match on First Name), board staff must immediately complete the voter's record in the county voter registration system and the SWVRD with the DOB from the field labeled BMV_DOB.

B. BMV Change of Address Requiring a Mandatory Update

The vast majority of BMV change of address records will be sent to counties via the online change of address system. Boards of elections must download and completely process all BMV change of address records at least once every work week. These records will be flagged as "BMV" records for voter registration tracking purposes. Boards of elections must track these changes of address as "BMV Change of Address" transactions for Election Assistance Commission (EAC) reporting purposes.

Boards of elections must continue to follow the instructions and timeline for all records provided through the online change of address system as instructed in [Directive 2012-32](#).

C. Possible-Match Pairs and BMV Changes of Address that Require the Board of Elections to Research and Resolve

Possible-match pairs and changes of address from the BMV that require review by the board of elections will be available in a single file. Changes of address from the BMV will be in this file for any of three reasons:

- The record is an unresolved duplicate in the SWVRD,
- The voter's record in the SWVRD does not contain a voter signature on file, or
- The address provided by the user to the BMV is not compatible with the address file layout requirements of the SOS online change of address system.

Boards of elections must download and completely process all possible match pairs and BMV changes of address labeled “BMV COA Review” at least once every work week.

1. BMV Changes of Address Labeled “BMV COA Review”

Changes of address from the BMV that are either duplicates or the address must be parsed before being entered into the voter registration system will be in a file labeled “BMV COA Review.” This file will contain BMV changes of address that the SOS was unable to parse or process and therefore cannot be sent via the online change of address system. Boards of elections must review the “BMV COA Review” file and make a determination on the validity of the address provided. If the address is found to be valid by the board, then the board can enter the valid address into the county VR system and update the voter’s address. A board may conduct additional research into any or all of the “BMV COA Review” records in order to make a determination of the validity of the address change. Boards of elections must track these changes of address as “BMV Change of Address” transactions for EAC reporting purposes. Additionally, boards of elections may correct any typos or data entry errors in the address in order to make the address valid and then update the voter’s address. If the board is unable to determine the validity of the address, the board must treat the record as an incomplete registration and contact the voter to obtain a complete or precinctable address.

2. Possible Match-Pairs

Under the six enumerated circumstances below, boards are to carefully examine all of the available information in the record pairs and the voter’s original registration form to determine whether the two records are, in fact, the same person and, if so, which record (BMV or SWVRD) contains the correct information. After researching and resolving the discrepancy, board staff must correct the voter’s record in the county voter registration system and the SWVRD as required to fix any incorrect information contained in the voter’s record. If the record does not match due to a BOE related data entry error, as evidenced by a review of the data compared to the record filed with the board by the voter, the record may be corrected without contacting the voter.

Boards of elections may contact the registered voter by mail to verify the accuracy of the information in the SWVRD if the board is unable to resolve a discrepancy identified between the voter’s information in the SWVRD and the corresponding information in the BMV database.

a. The Record Pairs Match Exactly on BMV ID, DOB, Last Name and First Name, but not SSN4

For every BMV-SWVRD matched record in which the two records match exactly on BMV ID, DOB, Last Name and First Name, but not SSN4, board staff must review the voter’s registration form to ascertain whether a data entry error explains the discrepancy. Boards must immediately correct their county voter registration system and the SWVRD as required to fix all data entry errors. Board

staff may contact the registered voter by mail to verify the accuracy of the SSN4 information in the SWVRD if the board is unable to resolve the discrepancy between the SSN4 in the SWVRD record and the SSN4 in the BMV record. The discrepancy in the SSN4 information must be resolved by the board for all of the BMV-SWVRD matched pairs.

b. The Record Pairs Match Exactly on BMV ID, SSN4, Last Name and First Name, but not DOB

For every BMV-SWVRD matched record in which the two records match exactly on BMV ID, SSN4, Last Name and First Name, but not DOB, board staff must review the voter's registration form to ascertain whether a data entry error explains the discrepancy. Boards must immediately correct their county voter registration system and the SWVRD as required to fix all data entry errors. Board staff may contact the registered voter by mail to verify the accuracy of the DOB information in the SWVRD if the board is unable to resolve the discrepancy between the DOB in the SWVRD record and the DOB in the BMV record. The discrepancy in the DOB information must be resolved by the board for all of the BMV-SWVRD matched pairs.

c. The Record Pairs Match Exactly on SSN4, DOB, Last Name and First Name, but not BMV ID

For every BMV-SWVRD matched record in which the two records match exactly on SSN4, DOB, Last Name and First Name, but not BMV ID, board staff must review the voter's registration form to ascertain whether a data entry error explains the discrepancy. Boards must immediately correct their county voter registration system and the SWVRD as required to fix all data entry errors. Board staff may contact the registered voter by mail to verify the accuracy of the BMV ID information in the SWVRD if the board is unable to resolve the discrepancy between the BMV ID in the SWVRD record and the BMV ID in the BMV record. The discrepancy in the BMV ID information must be resolved by the board for all of the BMV-SWVRD matched pairs.

d. The Record Pairs Match Exactly on BMV ID, Last Name and First Name, but not SSN4 and DOB

For every BMV-SWVRD matched record in which the two records match exactly on BMV ID, Last Name and First Name, but not SSN4 and DOB, board staff must review the voter's registration form to ascertain whether data entry errors explain the discrepancies. Boards must immediately correct their county voter registration system and the SWVRD as required to fix all data entry errors. Board staff may contact the registered voter by mail to verify the accuracy of the SSN4 and DOB information in the SWVRD if the board is unable to resolve the discrepancy between the SSN4 and DOB information in the SWVRD record and the SSN4 and DOB information in the BMV record. The discrepancies in the

SSN4 and DOB information must be resolved by the board for all of the BMV-SWVRD matched pairs.

e. The Record Pairs Match Exactly on BMV ID, SSN4 and Last Name, but not DOB and First Name

For every BMV-SWVRD matched record in which the two records match exactly on BMV ID, SSN4 and Last Name, but not DOB and First Name, board staff must review the voter's registration form to ascertain whether data entry errors explain the discrepancies. Boards must immediately correct their county voter registration system and the SWVRD as required to fix all data entry errors. Board staff may contact the registered voter by mail to verify the accuracy of the DOB and First Name information in the SWVRD if the board is unable to resolve the discrepancy between the DOB and First Name information in the SWVRD record and the DOB and First Name information in the BMV record. The discrepancies in the DOB and First Name information must be resolved by the board for all of the BMV-SWVRD matched pairs.

f. The Record Pairs Match Exactly on BMV ID, DOB and Last Name, but not SSN4 and First Name

For every BMV-SWVRD matched record in which the two records match exactly on BMV ID, DOB and Last Name, but not SSN4 and First Name, board staff must review the voter's registration form to ascertain whether data entry errors explain the discrepancies. Boards must immediately correct their county voter registration system and the SWVRD as required to fix all data entry errors. Board staff may contact the registered voter by mail to verify the accuracy of the SSN4 and First Name information in the SWVRD if the board is unable to resolve the discrepancy between the SSN4 and First Name information in the SWVRD record and the SSN4 and First Name information in the BMV record. The discrepancies in the SSN4 and First Name information must be resolved by the board for all of the BMV-SWVRD matched pairs.

If you have any questions about this Directive, please do not hesitate to contact Matt Masterson or Robin Fields at (614) 466-2585.

Sincerely,



Jon Husted