

Oregon Motor Voter (OMV) Rules Advisory Committee

September 15, 2025



Oregon Administrative Rule

☐ Division 5

☐ VOTER REGISTRATION

☐ 165-005-0170

☐ Oregon Motor Voter Registration

Voter Registration During Covered Transactions at DMV

Oregon Motor Voter Qualifications:

- United States Citizen
- At least 16 years old; and
- An Oregon resident.

Audit Conclusions

This audit of the OMV program concluded that processes and internal controls have been established around areas of previously identified errors and are generally effective, although some control gaps and exceptions were noted. Controls are in place to ensure the accuracy of voter registration data; however, one unsupported issuance transaction was identified during audit testing. ***There is a reliance on legacy citizenship records, resulting in potentially inaccurate or unsupported citizenship designations made prior to the strengthened control environment to persist, potentially leading to inaccurate data being transmitted by the OMV program. We did find that the systems and technologies supporting the program are appropriately configured, leverage automation effectively, and are adequately secured to protect voter registration data, with opportunities to improve user access management and oversight.***

During the audit, key strengths were noted that reflect a commitment to improvement and a proactive approach to program oversight. Program staff consistently exhibit a culture of continuous improvement, often identifying and addressing potential control gaps independently and ahead of audit inquiries. Additionally, the program shows strong legislative awareness, with teams actively monitoring and preparing for changes in state legislation that could impact the OMV program. Collectively, these strengths underscore the program's commitment to accountability, transparency, and ongoing service enhancement.



Findings

Finding 1: Citizenship Documentation and Verification (page 8) For one (1) of thirty-five (35) sampled transactions, records and documentation provided for the audit did not indicate proof documents had been presented by the customer to support US citizenship status.

Finding 2: Form 173DP and Oregon License Issuance and Vehicle Registration (OLIVR) Review Controls (page 9) While Field Services Admin Manual - Report Preparation Procedures (OPS-10) outlines a control requiring the review of Form 173DP and OLIVR entries, it does not require documentation or sign-off to evidence that the review was completed. As a result, the audit team was unable to test the operating effectiveness of this control.

Finding 3: Policy Evaluation and Legislative Monitoring (page 10) One policy was not reviewed within the expected cycle, and there is no formal documentation of the policy review cadence. Legislative updates are monitored for OMV Program impact, but there is no centralized tracking for federal legislation



Findings

Finding 4: Training Policy and Administration (page 11) While all sampled DMV staff completed required training on time, there is no formal written policy outlining annual training requirements. SOS does not administer OMV-specific training.

Finding 5: Issue Escalation Process (page 12) There is no formal, centralized process for escalating significant issues or errors within the OMV program to facilitate proper communication and escalation in a timely manner.

Finding 6: Signature File Transfer Documentation (page 13) Outbound time data for three (3) of thirty-five (35) signature files could not be verified due to unavailable system records, limiting assurance over timely processing.

Finding 7: Failure Notification Tracking (page 14) Neither DMV nor SOS maintain formal mechanisms to track and document system-generated failure notifications. Thirteen (13) of fifteen (15) failure notifications provided by SOS were either not resolved timely or lacked sufficient documentation to confirm resolution.

Finding 8: User and Admin Access Reviews (page 1) Formal user access reviews are not performed for the OMV system, or for administrative users for MOVEit.



Information systems included within the scope of this audit testing include:

Administered By	System	Relevant Function
ODOT	Oregon License Issuance and Vehicle Registration (OLIVR)	Processes data for daily DMV credential issuance transactions within field offices, with automated processes to identify eligible individuals for automatic voter registration through the OMV program.
	MOVEit	Secure managed file transfer software used to exchange DMV credential issuance and related OMV program data between DMV and SOS.
	MOVEit Transfer	A component of the MOVEit system, MOVEit Transfer includes the secured FTP site for SOS personnel to access transferred DMV credential issuance and related OMV program data from DMV.
SOS	Oregon Motor Voter System (OMV system)	SOS system with automated job processes receiving and processing DMV credential issuance and related OMV program data.



State of Oregon

Oregon Motor Voter Program Audit

July 1, 2025



1. Control Gap in Validating Legacy Citizenship Records

Risk: **High**

Criteria:

- According to the OMV Program's Field Driver License Procedure Manual (FDLPM-0101), a "C" Legal Presence (LP) indicator may only be assigned when a customer presents original or certified documentation proving U.S. citizenship (e.g., U.S. passport, birth certificate, naturalization certificate).
- The 173DP form must be completed and signed by two authorized staff members when verifying identity documents presented by a customer for citizenship designation.



Cause:

- Legacy records, including notation of proof documents establishing citizenship, from before the implementation of OLIVR were not carried forward into OLIVR customer records.
- ODOT (DMV) cannot require information for re-verification of citizenship once it has been established. Oregon statute ORS 807.040 specifies the required information for issuance transactions, and would not allow for additional information beyond what is stated in the statute.

Effect:

- Reliance on legacy citizenship records introduces a risk that inaccurate or unsupported “C-Citizen” designations may persist in the system. This could result in ineligible individuals being automatically registered to vote and only discovered if/when future transactions reveal non-citizen status based on documents presented. One of thirty-five (2.8%) sampled transactions had an unsupported “C-Citizen” designation. Although the number of potentially ineligible individuals being automatically registered to vote is likely too small to affect the outcome of an election, the existence of such cases poses a moderate reputational and compliance risk. It may undermine public trust in the voter registration process and expose the agency to increased scrutiny.



Recommendation

1.1) Develop and implement a formal plan to address legacy data concerns for Automatic Voter Registration (AVR). This plan should incorporate best practices and insights gathered from other AVR leaders from across the country and be developed collaboratively between ODOT and SOS. The plan should assess any changes or restrictions to the types of records shared from DMV to SOS, and potential updates needed in Oregon Administrative Rules, the Oregon Motor Voter Registration Manual, the ODOT/SOS Interagency Agreement, and related technology.



2. Lack of Evidence for Form 173DP and OLIVR Review Controls

Risk: **Moderate**

Criteria:

- According to the Field Services Administration Manual, OPS-10 Procedure (Effective 03/19/2025) pages 13–14, the report person is required to review Form 173DP and OLIVR entries for completeness and accuracy as part of the daily report preparation process.
- Best practices in internal control design recommend that key review activities be evidenced through signoff, timestamps, or other documentation to confirm that the control was performed.
- Controls should be clearly communicated and consistently applied across all field offices.



Cause:

- While the OPS-10 procedure outlines a control requiring the review of Form 173DP and OLIVR entries, it does not require documentation or sign-off to evidence that the review was completed

Effect:

- Without evidence of and accountability for the performance of Form 173DP and OLIVR reviews, there is a risk that these reviews may not be consistently performed – resulting in undetected errors in credential issuance or legal presence documentation.
- Potential for inaccurate data being transmitted to the SOS for automated voter registration purposes, affecting the integrity of the OMV Program.
- The lack of documented evidence limits the ability to monitor compliance, perform audits, or take corrective action when issues arise.



Recommendations

2.1) Update the OPS-10 procedure to require documented evidence that the Form 173DP and OLIVR reviews were completed (e.g., initials, electronic checklists, or audit logs) and communicate/train staff on this requirement

2.2) Consider implementing a periodic quality assurance review to verify that these controls are being performed and documented appropriately.



Voter Registration During Covered Transactions at DMV

Covered Interactions at DMV:

- Applying for an original driver license, permit, or ID card
- Renewing a driver license, permit, or ID card
- Applying for a replacement driver license, permit, or ID card

Voter Registration During Covered Transactions at DMV

Individuals Excluded from Automatic Voter Registration at DMV:

- Those who do not meet qualifications
- Participants in the DOJ Address Confidentiality Program
- Individuals/family members with a current DMV safety exemption (ORS 192.455)
- Law enforcement officials (OAR 735-062-0290)
- Public employees/family members who do not submit a residence address (ORS 802.250)
- Individuals categorized by DMV as continuous travelers
- Individuals who do not provide an electronic signature

Voter Registration During Covered Transactions at DMV

Automatic Voter Registration Process for Qualified Individuals:

- During a covered transaction, DMV technicians will inform qualified individuals that their information will be sent to the Secretary of State for voter registration.
- DMV will provide a document explaining the OMV process, timeline, and registration deadlines.
- The Secretary of State will review and update the OMV explainer document annually no later than November 30.
- DMV shall ensure the approved document is presented to qualified OMV registrants.
- If a transaction occurs within 30 days of a registration deadline, DMV must offer electronic or paper registration.

Voter Registration during covered transactions at the DMV

Automatic Voter Registration Process for Qualified Individuals - Continued:

- DMV technicians will inform individuals that their pin pad signature will be compared to the signature on their ballot envelope.
- Signage will be posted at pin pads to notify users.
- DMV will ensure the most recent signature is sent to the Secretary of State for each covered transaction.

Voter Registration during covered transactions at the DMV

Automatic Voter Registration Process for Qualified Individuals - Continued:

- DMV signature pin pads will at a minimum meet the industry best standards:

Resolution (DPI): ≥ 300 DPI for clarity and legibility

Pressure Sensitivity: Captures pen pressure for biometric verification

Sampling Rate (Hz): ≥ 100 Hz for smooth signature capture

Capture Data: Must include X, Y, T coordinates and pressure

Dynamic Signature Support: Enables forensic-grade verification

Voter Registration during covered transactions at the DMV

Voter Registration During Covered Transactions at the DMV - Scenarios to Define:

- **Unknown Qualifications:** Define EDVR process, pin pad signature, and document requirements
- **Change of Address (COA):** Define Change of Address (COA) process
- **Vehicle Purchases:** Define OMV or voter registration processes associated with vehicle purchases.

Next Steps

Next meeting: September 22, 2025

- Continued discussion related to voter registration during covered transactions at DMV.

