

Oregon Motor Voter (OMV) Rules Advisory Committee

October 6, 2025



Oregon Administrative Rule

☐ Division 5

☐ VOTER REGISTRATION

☐ 165-005-0170

☐ Oregon Motor Voter Registration

Baker Tilly Audit Finding Related to this Segment:

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.*



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



5. Lack of Formal Issue Escalation Process for the OMV Program

Risk: **Moderate**

Criteria:

- Internal control frameworks such as COSO and best practices in public sector governance recommend that agencies establish formal procedures for identifying, escalating, and resolving significant operational issues.
- Effective issue escalation processes are essential for ensuring timely communication, accountability, and resolution of errors that may impact service delivery, data integrity, or compliance.
- Oregon state agency standards emphasize the importance of timely and transparent communication between departments, particularly when managing sensitive data such as voter registration information.



Cause:

- There is no established policy or standardized protocol for identifying, documenting, and escalating significant issues across and within the DMV and SOS offices.

Effect:

- Delays in resolving critical errors may result in invalid voter registrations remaining uncorrected.
- The absence of a formal escalation process increases the risk of inconsistent handling of issues, reputational damage, and non-compliance with legal and operational standards.
- The absence of a documented escalation protocol may hinder an agency's ability to respond to critical issues, increasing the risk of reputational harm and operational inefficiencies.
- Inadequate documentation limits accountability and impairs the ability to respond effectively to audits or public inquiries.



Recommendations:

5.1 (ODOT & SOS) Develop a formal policy/protocol for escalating significant issues or errors, including a standard process for communications, defining type of issues/errors and necessary stakeholders to be notified. Consider developing an escalation decision tree to illustrate how various issues should be handled.

5.2 (ODOT & SOS) Maintain a consolidated issue log for documenting and tracking issues/errors to resolution.



SoS OMV File Processing

Upon receipt of OMV data files from DMV, SoS will compare the qualified individuals listed in the DMV files to individuals who have registration records in Oregon's centralized voter registration system (OCVR):

- Who is excluded from OMV at this stage?
 - Active registered voters with no changes to their record.
 - Qualified individuals who declined to register to vote through the OMV process in the past.
- Registration updates through OMV
 - Updating Information for Active Voters
 - Updating Information for Inactive Voters
 - Change of Address Process

SoS OMV File Processing

- SoS will facilitate the mailing of an OMV Opt-out notice to each OMV qualified individual.
 - Not later than the third working day after receipt of the DMV file, the SOS will deliver a print ready notice file to a print vendor for processing.
 - The date of maturation, for the 21-day period outlined in ORS, begins the day after the print vendor receives the notice file from the SOS.
 - Notices will be sent by forwardable mail, including a pre-addressed, postage paid return envelope.
 - Notices will be mailed using the following mailing hierarchy > Mailing address> Residential address.

SoS OMV File Processing

- Notices will include the following:
 - An explanation of the OMV process.
 - A space for OMV individuals to select a party.
 - A section for OMV individuals to opt out.
 - Consider categories/reasons for Opting out:
 - I decline to register to vote.
 - I am not qualified.
- A signature line.
- Ways to return the mailer.
 - Email, fax, or mail.

SoS OMV File Processing

- Returned OMV Notices- Within the 21-day Period
 - If an OMV notice is returned to the SoS before the 21-day maturation deadline:
 - As undeliverable- SoS will flag the record as undeliverable in the OMV system, and the record will be excluded from the file sent to counties.
 - With a party selection- SOS will enter party information into the OMV system, and the information will be provided in the file sent to counties.

SoS OMV File Processing

- Returned OMV Notices- Within the 21-day Period
 - With an opt-out reason- SoS will track the opt-out reason in the OMV system, and the record will be excluded from the file sent to counties.
 - If the opt-out reason is because the voters identify as not- qualified, the SoS will remove the voter from the OMV system and will notify the DMV of the error.
 - SOS staff will track the number and reason for self- identified non-qualified OMV individuals.
 - DMV will report the errors on their monthly audit report.
 - If the opt-out reason is because they decline to register to vote, the SoS will enter the information in the OMV system to ensure that the individual is excluded from being mailed opt-out notices or having their information transferred to a county in the future.

SoS OMV File Processing

- Returned OMV Notices- Within the 21-day Period
 - Incomplete notice process
 - Illegible notice process
 - Conflicting information process
 - Voter checks box to decline but also selects a party
 - Voter selects multiple parties
 - Unsolicited information process
 - Voter includes a note about an address update

SoS OMV File Processing

- Returned OMV Notices- After the 21-day Period
 - Describe SoS internal post 21-day process here.
 - Undeliverable notices
 - Declinations and party selections

County OMV File Processing

In compliance with ORS 247.012(3)-(9), local election officials will process OMV data in the same manner as other voter registration methods. Registration occurs when a legible, accurate, and complete registration is received.

County OMV File Processing

County processing of OMV notices after 21-day Period:

- Undeliverable
- Party Selection
- Declination
- Other/Misc

Method of Escalating, Tracking, and Reporting OMV Errors

- Discuss method for County to notify SoS of issues with OMV data.
- Notification from voter that they are not qualified, during the opt-out period, after maturation deadline?
- Notification from voter that they opted out of OMV in the past?
- Discuss method for SoS to notify DMV of issues of OMV data.
- Discuss method of tracking and reporting OMV errors.

Next Steps

Next meeting: October 20, 2025

- OMV Processing at SoS Discussion Continues
October 20 & 27

