



**Testimony by Kelly Dufour, Common Cause Ohio  
Before the House Finance Committee on  
The State Transportation Budget - House Bill 54  
February 25, 2025**

Chairman Stewart, Vice Chair Dovilla, Ranking Member Sweeney and members of the House Finance Committee. Thank you for the opportunity to provide feedback on the updated State Transportation Budget, House Bill 54.

My name is Kelly Dufour and I'm the voting and elections manager at Common Cause Ohio. Common Cause is a nonpartisan organization focused on strengthening public participation in our democracy and ensuring that our government is transparent and accountable to its citizens.

Common Cause Ohio respectfully requests that all proposed language referencing voting and elections law found in House Bill 54, the State Transportation Budget, be removed. Voting and elections laws are complicated, they affect operations at multiple state and county agencies, and they have the potential to unintentionally disenfranchise thousands of eligible voters if not developed in a thoughtful and comprehensive way.

The proposed election changes do not belong in a transportation budget and would layer significant burdens on voters and officials at both the BMV and county Boards of Elections.

First, federal law prohibits restricting voter registration access during state license transactions. The National Voter Registration Act of 1993 requires that any state motor vehicle driver's license applications and renewals must serve as a simultaneous voter registration application unless the applicant opts out<sup>1</sup>. Proof of citizenship process stipulations in House Bill 54, therefore, likely violate federal law.

Second, the Bureau of Motor Vehicles (BMV) is a licensing authority, not a voter registration tracking agency. This bill proposes that the BMV, Secretary of State, and 88 county Boards of Elections would every month track the private activities of Ohioans — change of residence and expiration of state ID or driver's license — neither of which directly impact one's right to be a registered voter.

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<sup>1</sup> <https://www.justice.gov/crt/national-voter-registration-act-1993-nvra>

Did you know, there are eight forms of ID legally acceptable for voting in Ohio, and only three are state-issued at the BMV?<sup>2</sup>

Proposed changes to voting laws in House Bill 54 disproportionately target voters at BMV transactions and indirectly, but also impact voters using alternative forms of eligible photo ID who do not frequent the BMV. For example,

An 80 year old voter who no longer drives but loves to travel can allow their driver's license to lapse and vote using a federal passport.

A military voter can use a military ID and have the right to remain an active registered voter regardless of what BMV records show.

And any voter can use a license with an old address as proof of acceptable photo ID to vote as long as their address is updated with their county Board of Elections.

In all cases, these valid voters should remain in active status, but with proposed changes in House Bill 54, could be forced to vote provisionally with threat of their registrations being cancelled.

Strict voter registration verification procedures are already in place. Eligible voters legally on the rolls should not need to re-prove their status or be forced to vote provisionally. Provisional ballots can be rejected for making a minor mistake or omission while completing the affirmation form - failing to check a box, incorrectly transcribing a state ID number, or even transposing your birth date. Proposed House Bill 54 changes would trap eligible voters in a system discrediting them before they head to the polls and forcing them off the rolls if they make one mistake on a complicated [Form 12-B](#) or couldn't return in person in four days to cure their ballot.<sup>3</sup>

The elections changes inserted into the State Transportation Budget, House Bill 54, is an attempt to use the BMV as the "voter police" to not only remove someone's federal right to register at the license/ID point-of-sale, but to force someone into provisional status for inactivity on state-issued IDs. Again, there are eight forms of ID legally acceptable for voting in Ohio, and only three are state-issued at the BMV.<sup>4</sup> These arbitrary limitations around only a portion of otherwise eligible voters is an expensive and unnecessary overreach and a waste of taxpayer dollars.

Ohio has experienced significant changes to our voting and elections laws in the last two years, and we are still waiting for full implementation of many of the changes. The BMV electronic voter registration reporting referenced in this bill has not even taken effect yet.

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<sup>2</sup> <https://www.ohiosos.gov/elections/voters/id-requirements/>

<sup>3</sup> [https://www.ohiosos.gov/globalassets/elections/forms/12-b\\_english.pdf](https://www.ohiosos.gov/globalassets/elections/forms/12-b_english.pdf)

<sup>4</sup> <https://www.ohiosos.gov/elections/voters/id-requirements/>

The BMV is still transmitting hardcopy registrations until April 9 when registrar offices are expected to switch to electronic reporting for the first time<sup>5</sup>. The ink isn't even dry for this conversion to faster, less error-prone, more secure, traceable reporting from the BMV, but language in House Bill 54 is already proposing more changes.

The reporting guidelines proposed in House Bill 54 would be in conflict with the new electronic BMV reporting. On one hand, Boards of Elections would be waiting on aging snapshot reports while on the other, receiving routine updates from BMV transactions sent to the Secretary of State's office within 24 hours. A voter could also contact their local Board of Elections directly and update their registration, only to later be flagged on an old BMV list, because the data was pulled at an earlier date. Election officials would be constantly flagging and unflagging registered voters.

The voting and elections changes included in the State Transportation Budget would disenfranchise eligible voters, potentially undermine the privacy of millions of Ohioans, create logistical and resource nightmares for Boards of Elections, but also substantially fail to improve voter list maintenance.

Funds could instead be allocated to statewide voter education so Ohioans are aware of their rights and requirements to vote, or to the county Boards of Elections to hire additional staff since they are perpetually underfunded and overburdened.

We respectfully request that the committee remove all proposed language referencing voting and elections law found in the State Transportation Budget - House Bill 54.

Thank you for your time.

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<sup>5</sup> <https://codes.ohio.gov/ohio-revised-code/section-3503.11>