



Impact of Ohio SB 153's Proof of Citizenship Requirement

SB 153 is a sweeping elections bill that imposes significant administrative burdens on county election officials and erects new barriers to the ballot for Ohioans of all backgrounds. Among the bill's many harmful restrictions is a new proof of citizenship requirement for voting. The bill creates a cumbersome process for verifying citizenship that would likely require all voters to provide documentary proof of citizenship (DPOC) in person¹ to either a bureau of motor vehicles (BMV) office or a county board of elections office. Under SB 153, only a short list of documents would qualify as proof of citizenship, including a birth certificate, a U.S. passport, and certificates of citizenship or naturalization. In practice, SB 153 would place significant financial burdens on county boards of elections and voters alike, as well as upend popular methods of voter registration, including registration by mail, community voter registration drives, and online voter registration.

Obtaining or replacing documentary proof of citizenship can cost hundreds of dollars, with processing times of six months or more

For many Ohioans, obtaining documentary proof of citizenship can be an expensive and lengthy process. Ohio-born citizens who apply in person at the Bureau of Vital Statistics can obtain a birth certificate on the same day, but those requesting a birth record online or by mail must wait four to six weeks. The greatest burdens will be on naturalized and derivative citizens, for whom the process of obtaining proof of citizenship is both longer and more costly. For the **over 300,000 Ohioans who are naturalized citizens or derived citizenship from their parents,¹ obtaining or replacing proof of citizenship can cost from over \$500 to nearly \$1,400 and take up to six months.** Citizens who have changed their names would likely bear extra costs and processing waits for documents aligning their name change with proof of citizenship.

Typical Forms of DPOC and Costs/Processing Times (May 2025)

Form of DPOC	Type of U.S. Citizen	Fees	Processing Time
Ohio Birth Certificate ²	U.S.-born	\$21.50 (Ohio Vital Statistics)	In-Person (same day); Mail/Online (4-6 weeks)
Out-of-State Birth Certificate	U.S.-born	Varies	Varies
Replacement Consular Report of Birth Abroad ³	Born Abroad to U.S. Citizen Parents	\$50	4-8 weeks (14-16 weeks if original issued before 11/1/90)
U.S. Passport ⁴	Any U.S. Citizen	\$165	4-6 weeks
Replacement Certificate of Naturalization ⁵	Naturalized U.S. Citizen	\$505 (online)- \$555 (paper)	6 months
Certificate of Citizenship ⁶	Born Abroad to U.S. Citizen or Derived Citizenship as Minor through Naturalized Parents	\$1335 (online)- \$1385 (paper)	3-6 months

¹ SB 153 does not specify whether voters must provide proof of citizenship in person. However, under current Ohio law, voters who vote provisionally due to a lack of acceptable photo ID must subsequently present ID in person to their county board of elections to have their vote counted. Ohio Stat. § 3505.181(B)(7)(b).



Thousands of Ohioans living in poverty, many of whom reside in rural counties, would face even more serious burdens based on their lower incomes and reduced access to governmental resources. While Ohio's statewide poverty rate (percentage of families below poverty level) is 9.2 percent, poverty rates in many rural counties are typically 50-90 percent higher.⁷ At 17.6 percent, Scioto County's poverty rate is nearly double the state average. Poverty rates in other rural counties are comparable (e.g., Pike County (15.7%); Adams County (14.8%); Lawrence County (13.7%)). The high costs of obtaining documents from the federal government to prove naturalized or derivative citizenship could be insurmountable for many low-income voters.

Thus, the high costs and extended processing times associated with obtaining documentary proof of citizenship could prevent voting-eligible citizens throughout Ohio from registering to vote in the next election cycle. And the lengthy waiting periods are especially consequential, given that Ohio's voter registration deadline is 30 days before an election.

According to a recent survey, nearly one in 10 voters lack or cannot readily access documentary proof of citizenship

A recent national survey co-sponsored by the University of Maryland's Center for Democracy and Civic Engagement and other groups shows that **nine percent of voting-eligible citizens** (over 21.3 million people) lack or cannot easily access documentary proof of citizenship, such as a birth certificate, a U.S. passport, a certificate of naturalization, or a certificate of citizenship.⁸ Nearly two percent of Americans eligible to vote (over 3.8 million people) lack *any* form of documentary proof of citizenship. And there are significant disparities along racial and ethnic lines: **Eleven percent of people of color**, compared to only eight percent of white people, lack or cannot easily access documentary proof of citizenship.

Assuming Ohio's percentages are consistent with these survey results, this would mean that out of the state's approximately 8.9 million voting-eligible citizens, **over 800,000 Ohio citizens do not have, or do not have access to, documentary proof of citizenship**. It would also mean that among over 1.6 million voting-eligible citizens of color, **nearly 182,000 people of color lack or cannot easily access documentary proof of citizenship**.⁹

Registering to vote and casting a ballot will be more onerous and obstacle-ridden for millions of Ohioans

In practice, SB 153 would likely hinder all methods of voter registration except at BMV or boards of elections offices. SB 153 sets forth an onerous process that would require voters to show proof of citizenship in person to the BMV or their board of elections before they may cast a regular ballot. Voters whose citizenship is not verified prior to an election would have to vote by provisional ballot and then take additional steps to ensure their vote is counted. Even voters who timely submit proof of citizenship could face administrative delays during the verification process that might prevent them from being cleared in



time to vote a regular ballot.² These obstacles would significantly decrease the ease and reliability of popular methods of voter registration, including online voter registration and community-based voter registration drives, and ultimately put Ohioans who rely on them at higher risk of disenfranchisement. Over time, these disadvantages may cause Ohioans to stop using most methods of voter registration altogether.

Based on our analysis of 2024 Census data,¹⁰ **31.6 percent of voting-eligible Ohioans—or 2,079,917 people—are currently registered to vote through methods that would be disrupted by SB 153.** This number may be an underestimate because the impact of SB 153 on some methods of registration is less clear. SB 153’s barriers to voting would affect not just prospective voter registration applicants but also any currently registered voters who may need to update their voter registration in the future.

Potential Effects of SB 153 on Methods of Registration (Statewide and Largest CBSAs*)

	% of CVAP** registered through method disrupted by SB 153	% using registration method less likely to be affected by SB 153	% unsure of registration method used or refused to answer
State of Ohio	31.6% (2,079,917 people)	41.1% (2,707,746 people)	27.3% (1,798,586 people)
Cincinnati CBSA	35.3% (357,923 people)	42.0% (425,318 people)	22.7% (230,120 people)
Cleveland-Elyria CBSA	27.1% (382,271 people)	35.8% (505,714 people)	37.1% (522,995 people)
Columbus CBSA	40.2% (456,003 people)	50.7% (574,839 people)	9.0% (102,296 people)
* Core-Based Statistical Areas (CBSAs) are geographic areas defined by the Office of Management and Budget that combine a core population center with adjacent communities that have significant similarities to that center. CBSA data appear more consistently in the Current Population Survey (CPS) data sets, unlike county or municipality data, most of which are omitted from the CPS.			
** Citizens of Voting Age Population (CVAP) refers to the total population age 18 and over and a citizen.			
The November 2024 Voting & Registration Supplement to the Census’s Current Population Survey (CPS) asks voters how they registered to vote. Possible answers: at a department of motor vehicles; at a public assistance agency; mailed form to election office; using the internet or online; at school, hospital, or campus; at county or government registration office; at registration drive; at polls on election day; other place/way; and don’t know or refused.			
For this analysis, we assume SB 153’s proof of citizenship requirement would hinder the following methods of registration: mailed form to election office; using the internet or online; at school, hospital, or campus; and at registration drives. However, note that the bill could also impact registrations at public assistance agencies, though we assume this to be less likely because of the potential for data sharing between government agencies.			

² SB 153 requires significant coordination between the Secretary of State’s office and boards of elections to take voters out of provisional-ballot-only status. Though boards of elections must remove a provisional-ballot-only indication from a voter’s file “as soon as possible” upon receiving notice of citizenship verification from the Secretary of State, there is nothing that guarantees that this process will be completed before an election. Moreover, every board of elections may interpret “as soon as possible” differently based on factors such as staff resources or county population, which will lead to variation in how the law is implemented.



Naturalized and derivative citizens would be particularly at risk of disenfranchisement and prosecution

Naturalized and derivative citizens would be at particular risk of disenfranchisement under SB 153. The bill requires the Secretary of State to regularly review the BMV database to flag any potential noncitizens on the voter rolls. Anyone identified as a noncitizen in this manner would be permitted to vote only by provisional ballot. Worse still, SB 153 directs the Secretary of State to cancel the voter registration of anyone who is flagged as a noncitizen and refer them for investigation and possible prosecution if the person does not present documentary proof of citizenship or cancel their voter registration within 28 days.

But the problem with relying on BMV records to verify citizenship is that the BMV does not maintain up-to-date information about citizenship status. Therefore, naturalized and derivative citizens will inevitably end up in the crosshairs of a citizenship verification process that relies on BMV records. For example, a naturalized citizen who was a lawful permanent resident at the time they obtained a driver's license will likely continue to appear as a noncitizen in the BMV database until they renew their driver's license. Similarly, a teenage driver who obtains derivative citizenship through parental naturalization would continue to appear as a noncitizen, even after they turn 18 and become eligible to vote. While SB 153 requires election officials to also cross check BMV data against information contained in the federal Systemic Alien Verification for Entitlements (SAVE) system, SAVE has also long been criticized as an unreliable means for verifying voter eligibility.¹¹

Local boards of elections would have to undertake unnecessary and excessive administrative burdens as part of this unfunded mandate

SB 153 would overload local boards of elections by requiring them to implement a tedious and unnecessary process for verifying citizenship—without providing any additional funding to carry out these mandates. Boards of elections would have to absorb direct costs associated with the citizenship verification process, such as the costs of mailing mandatory notices to voter registration applicants. Beyond financial burdens, the bill would also pile more training and hiring needs upon boards of elections that are already buckling under the weight of growing demands. According to a 2024 report, Ohio's election workforce faces numerous challenges, chief among them staff exhaustion, retention, and recruitment.¹² Another study found that between 2018 and 2022, the board of elections director turned over in half of Ohio's 88 counties.¹³ By imposing unnecessary administrative tasks on overworked elections officials, SB 153 only exacerbates election workforce issues and diverts limited resources away from critical functions of election administration.

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- ¹ American Community Survey Five-Year Estimate 2023. U.S. Census Bureau. Retrieved from IPUMS NHGIS, University of Minnesota. Accessed May 9, 2025. www.ipums.org.
- ² "How to Order Certificates." Ohio Department of Health. <https://odh.ohio.gov/know-our-programs/vital-statistics/how-to-order-certificates>.
- ³ "How to Replace or Amend a Consular Report of Birth Abroad (CRBA)." U.S. Department of State. <https://travel.state.gov/content/travel/en/replace-certify-docs/requesting-a-record/replace-amend-CRBA.html>.
- ⁴ "U.S. Passports and Real ID." U.S. Department of State. <https://travel.state.gov/content/travel/en/passports.html>.
- ⁵ "N-565, Application for Replacement Naturalization/Citizenship Document." U.S. Citizenship and Immigration Services. <https://www.uscis.gov/n-565>.
- ⁶ "N-600, Application for Certificate of Citizenship." U.S. Citizenship and Immigration Services. <https://www.uscis.gov/n-600>.
- ⁷ "HDPulse: An Ecosystem of Minority Health and Health Disparities Resources." National Institute on Minority Health and Health Disparities. Accessed May 23, 2025. <https://hdpulse.nimhd.nih.gov>.
- ⁸ "Who Lacks Documentary Proof of Citizenship?" University of Maryland, Center for Democracy and Civic Engagement. March 2025. <https://cdce.umd.edu/sites/cdce.umd.edu/files/Who%20Lacks%20Documentary%20Proof%20of%20Citizenship%20March%202025.pdf>.
- ⁹ American Community Survey Five-Year Estimate 2023. U.S. Census Bureau. Retrieved from IPUMS NHGIS, University of Minnesota. Accessed May 9, 2025. www.ipums.org.
- ¹⁰ Current Population Survey Voting and Registration Supplement Public Use Microdata Sample (November 2024). U.S. Census Bureau. Accessed May 9, 2025. https://www.census.gov/data/datasets/time-series/demo/cps/cps-supp_cps-repwgt/cps-voting.html.
- ¹¹ "Systematic Alien Verification for Entitlements (SAVE): An Overview." American Immigration Council. Aug. 3, 2021. <https://www.americanimmigrationcouncil.org/research/systematic-alien-verification-entitlements-save-program-fact-sheet>. See also "Immigration Status Verification for Benefits: Actions Needed to Improve Effectiveness and Oversight." U.S. Government Accountability Office. March 2017. <https://www.gao.gov/assets/gao-17-204.pdf>.
- ¹² All Voting is Local Ohio, "An Exhaustible Resource: Responding to Challenges Facing Ohio's Election Workforce." 2024. https://allvotingislocal.org/wp-content/uploads/All-Voting-OH_Election-Workforce-Report.pdf.
- ¹³ "Election Official Turnover Rates from 2000-2024." Bipartisan Policy Center. April 2024. https://bipartisanpolicy.org/download/?file=wp-content/uploads/2024/04/WEB_BPC_Elections_Admin_Turnover_R01.pdf.