

A large American flag is draped over a metal frame, likely a podium or a display stand. The flag is the central focus, with its red and white stripes and blue field with white stars clearly visible. Below the flag, the lower legs and feet of a person standing behind the frame are visible. The person is wearing light-colored trousers and dark shoes. The background is a plain, light-colored wall.

U.S. ELECTION ASSISTANCE COMMISSION

ELECTION MANAGEMENT GUIDELINES



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INTRODUCTION

Background

The Help America Vote Act of 2002 (HAVA) established the U.S. Election Assistance Commission (EAC) to “assist in the administration of Federal elections and to otherwise provide assistance with the administration of certain Federal election laws and programs, to establish minimum election administration standards for States and units of local government with responsibility for the administration of Federal elections, and for other purposes.” Section 202 of HAVA directs the EAC to serve as a national clearinghouse and resource for the compilation of information and review of procedures with respect to the administration of Federal elections by adopting voluntary voting systems guidelines; by providing for the testing, certification, decertification, and recertification of voting system hardware and software; and by conducting research and activities that promote the effective administration of elections.

In December 2005, the EAC unanimously adopted the 2005 Voluntary Voting System Guidelines (VVSG), which significantly increased security requirements for voting systems and expanded access, including opportunities to vote privately and independently, for individuals with disabilities. The VVSG provide a set of specifications and requirements against which voting systems can be tested to determine if the systems provide all the basic functionality, accessibility, and security capabilities required of these systems. In addition, the VVSG establish evaluation criteria for the national certification of voting systems. As required by HAVA, they also update and augment the 2002 VSSG to address advancements in election practices and computer technologies.

Purpose

Having adopted and published the 2005 VVSG, the EAC considered and approved the development of a

set of election management guidelines to complement the technical standards for voting equipment. It is the first time that election administration resources are consolidated into one document and made readily accessible to election officials at all levels. Before this effort, election officials depended on materials developed and shared almost exclusively at the State and local levels. The National Association of State Election Directors (NASED) has long recognized the need for national guidelines, but it is only now that a Federal agency is able to devote the time and resources needed for the development and distribution of such guidelines. The EAC and NASED have agreed to cooperatively undertake this effort over the next few years.

The creation of the Election Management Guidelines (EMG) is a priority activity under the EAC’s national clearinghouse role to promote the effective administration of elections. The long-term goal of the EMG is to provide a comprehensive set of election management guidelines (consolidated into one document) to assist State and local election officials in effectively managing and administering elections. The EAC expects the full set of guidelines to be completed over the next few years. Because of the urgency for resources to assist election officials, however, the EMG have been divided into subject matter modules so that chapters on particular topics can be completed on a priority basis and be distributed to the election community as soon as they are completed. In addition, a series of Quick Start Management Guides has been developed to highlight and summarize information contained in the EMG chapters. They also introduce readers to subject matter modules that will be expanded in future chapters of the EMG.

The EMG subject matter modules cover a wide spectrum of election administration topics ranging from procedures prior to conducting an election to post-election activities and management. Some particular

areas to be covered are absentee voting, statewide voter registration systems, voting system management, information technology, precinct definition, poll workers, polling places, military and overseas voters, facility management, office administration, voter outreach, and Election Day procedures and practices.

IMPORTANT These guidelines do not endorse one method of election administration over another, and they are not intended as “one size fits all.” States and local election jurisdictions are not required to consider or implement the recommendations or practices contained in the EMG. These guidelines are solely designed to serve as a source of information for election officials and not as requirements by which they must abide. Election jurisdictions reserve the right to consider and implement any of the recommendations contained in the EMG in consultation with the appropriate State and local election authorities.

To make the EMG reflective of the realities faced by election officials across the United States, the EAC has sought input and recommendations from State and local election officials and other election professionals and experts who have first-hand experience managing elections. Their input has been invaluable to the development of the EMG. Readers and users of these guidelines are encouraged to provide feedback and recommendations to the EAC regarding the usability and feasibility of the EMG and the practices contained within. The EMG, as a work in progress, can be sustained only by their utility and applicability to the administration of elections.

Comments or questions should be sent to the following:

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Copies of the *Election Management Guidelines* and the *Quick Start Management Guide* series brochures are available on the EAC Web site at www.eac.gov or by contacting the EAC at the telephone number or e-mail address listed above.

ACKNOWLEDGMENTS

The U.S. Election Assistance Commission thanks the election officials in the following jurisdictions for their time, energy, and experience in making this document both meaningful and usable by the election community in the United States.

LOCAL ELECTION JURISDICTIONS

Arlington County, VA	Clark County, NV	Halifax, VA	Montgomery County, MD
Augusta County, VA	Comal County, TX	Harris County, TX	New Castle County, DE
Bexar County, TX	County of Henrico, VA	Hinds County, MS	New York City, NY
Boone County, MO	Cumberland County, NC	Lane County, OR	Okaloosa County, FL
Cerro Gordo County, IA	Dallas County, TX	Larimer County, CO	Orange County, NC
Chelan County, WA	Denver County, CO	Linn County, IA	Richmond County, GA
Chesterfield County, VA	District of Columbia	Los Angeles County, CA	Sacramento County, CA
Citrus County, FL	Fairfax County, VA	Marion County, OH	Santa Ana, CA
City of Charlottesville, VA	Forsyth County, GA	Marshall County, IA	Santa Fe, NM
City of Danville, VA	Franklin County, OH	Mecklenberg County, NC	Travis County, TX
City of Richmond, VA	Guilford County, NC	Miami-Dade County, FL	Wake County, NC

STATE ELECTION OFFICES

State of Arizona	State of Kansas	State of Missouri
State of Florida	State of Louisiana	State of North Dakota
State of Georgia	State of Maryland	State of South Carolina
State of Iowa	State of Michigan	State of Wisconsin

ORGANIZATIONS

EAC Advisory Board	The International Association of Clerks, Recorders, Election Officials, and Treasurers
EAC Standards Board	The National Association of Secretaries of States
The Election Center	The National Association of State Election Directors
Federal Voting Assistance Program	Voting Systems Consultants, LLC
MIT/CalTech Voting Project	



CHAPTER 1

CERTIFICATION

Introduction

The Federal Election Commission (FEC) adopted the first formal set of voluntary Federal standards for computer-based voting systems in January 1990. No national program or organization existed to test and certify such systems to the standards. However, in 1994, the National Association of State Election Directors (NASD) stepped up to fill this void. NASD is an independent, nongovernmental organization of State election officials. This organization formed the Nation's first national program to test and qualify voting systems to the new Federal standards. The organization worked, on a strictly voluntary basis, for more than a decade to help ensure the reliability, consistency, and accuracy of voting systems fielded in the United States. In late 2002, Congress passed the Help America Vote Act of 2002 (HAVA). HAVA created the U.S. Election Assistance Commission (EAC) and assigned to this Commission the responsibility for both setting voting system standards and providing for the testing and certification of voting systems. This mandate represented the first time the Federal government provided for the voluntary testing, certification, and decertification of voting systems nationwide. In response to this HAVA requirement, the EAC developed the Voting System Testing and Certification Program (Certification Program).

HAVA requires that the EAC certify and decertify voting systems. Section 231(a)(1) of HAVA specifically requires the EAC to "... provide for the testing, certification, decertification and recertification of voting system hardware and software by accredited laboratories." The EAC has the sole authority to grant certification or withdraw certification at the Federal level, including the authority to grant, maintain, extend, suspend, and withdraw the right to retain or use any certificates, marks, or other indicators of certification.

Pursuant to the authority granted under HAVA, the EAC has developed and promulgated the EAC Voting System Testing and Certification Program Manual which provides the procedural requirements of the EAC Certification Program. Although participation in the program is voluntary, adherence to the program's procedural requirements is mandatory for participants.

The primary purpose of the EAC Testing and Certification Program Manual is to provide clear procedures to Manufacturers for the testing and certification of voting systems to specified Federal standards consistent with the requirements of HAVA Section 231(a)(1). The program, however, also serves to do the following:

- ★ Support State certification programs.
- ★ Support local election officials in the areas of acceptance testing and pre-election system verification.
- ★ Increase quality control in voting system manufacturing.
- ★ Increase voter confidence in the use of voting systems.

EAC Testing and Certification Program Manual

The Testing and Certification Program Manual is a comprehensive presentation of the EAC Certification Program. It is intended to establish all of the program's administrative requirements. (The manual may be accessed in its entirety at <http://www.eac.gov/docs/Voting%20System%20Testing%20and%20Certification%20Program%20Manual-Final%20-120506.pdf>)

The contents of the manual serve as an overview of the program itself and contain the following chapters:

- ★ *Manufacturer Registration.* Manufacturer registration is the process by which voting system Manufacturers make initial contact with the EAC and provide information essential to participate in the EAC Certification Program. Before a Manufacturer of a voting system can submit an application to have a voting system certified by the EAC, the Manufacturer must be registered. This process requires the Manufacturer to provide certain contact information and agree to certain requirements of the Certification Program. After successfully registering, the Manufacturer receives an identification code.
- ★ *When Voting Systems Must Be Submitted for Testing and Certification.* An EAC certification signifies that a voting system has been successfully tested to identified voting system standards adopted by the EAC. Only the EAC can issue a Federal certification. Ultimately, to receive this certification, systems must be submitted for testing and certification under this program. Systems will usually be submitted when (1) they are new to the marketplace, (2) they have never before received an EAC certification, (3) they are modified, or (4) the Manufacturer wishes to test a previously certified system to a different (newer) standard. This chapter also discusses the submission of de minimis changes, which may not require additional testing and certification, and provisional, pre-election emergency modifications, which provide for pre-election, emergency waivers.
- ★ *Certification Testing and Review.* This chapter discusses the procedural requirements for submitting a voting system to the EAC for testing and review. The testing and review process requires an application, employment of an EAC-accredited testing laboratory, and technical analysis of the laboratory test report by the EAC. The result of this process is an Initial Decision on Certification by the Decision Authority, the EAC Executive Director.
- ★ *Grant of Certification.* The grant of certification is the formal process through which the EAC acknowledges that a voting system has successfully completed conformance testing to an appropriate set of standards or guidelines. The grant of certification begins with the Initial Decision on Certification by the Decision Authority. This decision becomes final after the Manufacturer confirms that the final

version of the software, which was certified and will be delivered with the certified system, has been subject to a trusted build, placed in an EAC-approved repository, and can be verified using the Manufacturer's system identification tools. After a certification is issued, the Manufacturer is provided a Certificate of Conformance, and relevant information about the system is added to the EAC Web site. Manufacturers with certified voting systems are responsible for ensuring that each system they produce is properly labeled as certified.

- ★ *Denial of Certification.* If the Decision Authority issues an Initial Decision denying certification, the Manufacturer has certain rights and responsibilities. The Manufacturer may request an opportunity to cure the defects identified by the Decision Authority. In addition, the Manufacturer may request that the Decision Authority reconsider the Initial Decision after the Manufacturer has had the opportunity to review the record and submit supporting written materials, data, and the rationale for its position. Finally, in the event reconsideration is denied, the Manufacturer may appeal the decision to the Appeal Authority.
- ★ *Decertification.* Decertification is the process by which the EAC revokes a certification previously granted to a voting system. It is an important part of the Certification Program because it ensures that the program requirements are followed and that certified voting systems fielded for use in Federal elections maintain the same level of quality as those presented for testing. Decertification is a serious matter and will significantly affect Manufacturers, State and local governments, the public, and the administration of elections. As such, the process for Decertification is complex. It is initiated when the EAC receives information that a voting system may not be in compliance with the applicable voting system standards or the procedural requirements of this manual. Upon receipt of such information, the program director may initiate an Informal Inquiry to determine the credibility of the information. If the information is credible and suggests the system is non-compliant, a Formal Investigation will be initiated. If the Formal Investigation results demonstrate non-compliance, the Manufacturer will be given a Notice of Non-Compliance. Before a Final Decision on Decertification is made, the Manufac-

turer will have the opportunity to remedy any defects identified in the voting system and present information for consideration by the Decertification Authority. A decertification of a voting system may be appealed in a timely manner.

★ *Quality Monitoring Program.* The quality of any product, including a voting system, depends on two specific elements: (1) the design of the product or system and (2) the care and consistency of the manufacturing process. The EAC testing and certification process focuses on voting system design by ensuring that a representative sample of a system meets the technical specifications of the applicable EAC voting system standards. This process, commonly called “type acceptance,” determines whether the representative sample submitted for testing meets the requirements. Type acceptance does not explore whether variations in manufacturing may allow production of non-compliant systems. Generally, manufacturing quality is the responsibility of the Manufacturer. After a system is certified, the vendor assumes primary responsibility for compliance of the products produced. This level of compliance is accomplished by the Manufacturer’s configuration management and quality control processes. The EAC’s Certification Quality Monitoring Program, as outlined in this chapter, however, provides an additional layer of quality control by allowing the EAC to perform manufacturing site reviews, carry out fielded system reviews, and gather information on voting system anomalies from election officials. These additional tools help ensure that voting systems continue to meet the requirements of EAC’s voting system standards as the systems are manufactured, delivered, and used in Federal elections. These aspects of the program enable the EAC to independently monitor continued compliance of fielded voting systems.

★ *Requests for Interpretations.* A Request for Interpretation is a means by which a registered Manufacturer or Voting System Test Laboratory (VSTL) may seek clarification on a specific EAC voting system standard (VVSG or VSS). An Interpretation is a clarification of the voting system standards and guidance so Manufacturers or VSTL can properly evaluate conformance to it. Suggestions or requests for modifications to the standards are provided by other processes. This chapter outlines the policy, requirements, and procedures for submitting a Request for Interpretation.

★ *Release of Certification Program Information.* Manufacturers participating in the Certification Program are required to provide a variety of documents to the EAC. Generally, these documents are releasable to the public. Moreover, in many cases, the information provided is affirmatively published by the EAC. In limited cases, however, documents may not be released if they include trade secrets, confidential commercial information, or personal information. Although the EAC is ultimately responsible for determining which documents Federal law protects from release, Manufacturers must identify the information they believe is protected and ultimately provide substantiation and a legal basis for withholding. This chapter discusses EAC’s general policy on the release of information and provides Manufacturers with standards, procedures, and requirements for identifying documents as trade secrets or confidential commercial information.

Program Methodology

The EAC Certification Program is but one part of the overall conformity assessment process; the Certification Program includes companion efforts at the State and local levels.

Federal and State Roles. The process to ensure that voting equipment meets technical requirements is a distributed, cooperative effort by Federal, State, and local officials in the United States. Working with voting equipment Manufacturers, these officials each have unique responsibility for ensuring that the equipment a voter uses on Election Day meets specific requirements.

★ The EAC Certification Program has primary responsibility for ensuring that voting systems submitted under this program meet Federal standards established for voting systems.

★ State officials are responsible for testing voting systems to ensure that they support the specific requirements of each individual State. States may use EAC VSTLs to perform testing of voting systems that are unique to State requirements while the systems are being tested to Federal standards. The EAC will not, however, certify voting systems to State requirements.

★ State or local officials are responsible for making the final purchase choice of voting equipment. They

are responsible for deciding which system offers the best fit and total value for their specific State or local jurisdiction.

- ★ State or local officials are also responsible for acceptance testing to ensure that the equipment delivered is identical to the equipment certified at the Federal and State levels, is fully operational, and meets the contractual requirements of the purchase.
- ★ State or local officials should perform pre-election logic and accuracy testing to confirm that equipment is operating properly and is unmodified from its certified state.

Conformity Assessment, Generally. Conformity assessment is a system to ensure that a product or service meets the requirements that apply to it. Many conformity assessment systems exist to protect the quality and ensure compliance with requirements of products and services. All conformity assessment systems attempt to answer the following questions:

- ★ *What specifications are required of an acceptable system?* For voting systems, the EAC VVSG and VSS address this issue. States and local jurisdictions also have supplementing standards.
- ★ *How are systems tested against required specifications?* The EAC Certification Program is a central element of the larger conformity assessment system. The program, as set forth in the manual, provides for the testing and certification of voting systems to identified versions of the VVSG. The Certification Program's purpose is to ensure that State and local jurisdictions receive voting systems that meet the requirements of the VVSG.
- ★ *Are the testing authorities qualified to make an accurate evaluation?* The EAC accredits VSTLs, after the National Institute of Standards and Technology's (NIST) National Voluntary Lab Accreditation Program (NVLAP) has reviewed their technical competence and lab practices, to ensure these test authorities are fully qualified. Furthermore, EAC technical experts review all test reports from accredited laboratories to ensure an accurate and complete evaluation. Many States provide similar reviews of laboratory reports.
- ★ *Will Manufacturers deliver units within manufacturing tolerances to those tested?* The VVSG and this manual require that vendors have appropriate change management and quality control processes to control the quality and configuration of their products. The Certification Program provides mechanisms for the EAC to verify Manufacturer quality processes through field system testing and manufacturing site visits. States have implemented policies for acceptance of delivered units.



CHAPTER 2

SYSTEM SECURITY

Introduction

Overall security of a computer-based voting system is enhanced by a combination of four factors working in concert together:

- ★ *Use of software should be limited to the very basic functions required to perform in the voting system's processes.* In addition, the software should provide audit scripting to track sequence of events that occur on the system and, to the extent possible, identify person(s) that initiated the events. The software should also employ a sufficient level of encryption or validation protocol to limit changes made without proper authorization.
- ★ *Use well-defined, strictly enforced policies and procedures to control access to the voting system, the circumstances under which users can access the system, and functions users are allowed to perform on the system.* Maintain strong custody control of all equipment, software, and key or control materials at all times.
- ★ *Use physical security and access logs.* Physical security, including fences, walls, doors, locks, seals, and so forth, control and limit access to the system.
- ★ *Use a two-person accountability and control system.* Access, control, and custody should always involve two or more personnel. This accountability independently verifies the honesty and integrity of the election procedures under any scrutiny.

There is no “one size fits all” for each of these factors. Appropriate policies and procedures for a large election office with over a dozen staff members may be overly burdensome for a small, two-person election office. The following sections provide guidelines for implementing these four factors within the election environment. Factors that are considered important

will be clearly indicated. A range of acceptable factors are presented where possible.

Software Security

Initial Installation. The first step in securing voting system software is ensuring that the software installed on the system is the exact software version that has been certified by your State or the Federal certification program. The most straightforward way to accomplish this task is to obtain the software directly from your State elections office or the Voting System Test Laboratory (VSTL) that performed the tests for EAC certification.

It is not uncommon to find an election office in which the voting system has been installed for a considerable length of time, during which the vendor has had access the system unsupervised by an election official. In circumstances such as this, strongly consider the following recommendation:

- ★ If you suspect that the voting system software has been compromised, reinstall the voting system software with a copy of the software obtained directly from your State elections office or the VSTL that performed the tests for EAC certification.

As the last act, a VSTL produces a “final build” or “trusted build” of the system. The output of this final build is a CD that contains the system source code, the object code, and various documents. In addition, they also produce a self-loading disk that can install the system on your computer.

- ★ A copy of the self-loading disk is required to reinstall the system. If the State election office does not have the disk, it can obtain the disk by requesting that your vendor authorize the Independent Testing Authority (ITA) that performed the certification tests on the system to send the

disk to the State office or directly to you. If you are unsure about how to install the disk, contact your State election office for instructions and help.

- ★ The self-loading CD installs the election management system on the central election computer. If the firmware in the voting stations or ballot scanners needs to be reinstalled, ask your vendor what you need from your State election office or the ITA. The device will probably be a PCMCIA (Personal Computer Memory Card International Association) card or a similar device.

Although it is important for the voting software to be complete and correct, it is equally important that the voting system software is the *only* software on the vote-tabulating computer.

- ★ Do not allow any software on the vote-tabulating computer except for the voting system software itself. Specifically, do not allow office automation software such as Microsoft Word, PowerPoint, Excel, and so forth, or networking software such as e-mail, network browsers, and so forth.

Periodic Monitoring. After the voting system is correctly installed, processes and procedures need to be implemented to keep the software secure.

The National Institute of Standards and Technology (NIST) offers a secure software repository, the National Secure Reference Library (NSRL). This service enables election personnel to check periodically that the installed software has not been altered.

NIST obtains a copy of each voting system from the EAC VSTL and computes a digital signature of the system. NSRL can create the same digital signature for your system and compare it to the signature in the NIST library. This comparison will reveal any alteration to the system.

- ★ The Web site for this service is www.nsrl.nist.gov/votedata.html. On this Web site is a list of voting systems that have been submitted to NIST for inclusion in the NSRL. If the version of the voting system you are running is not on this list, request that your vendor submit the system or system version to NSRL.
- ★ Even if your voting system is on this list, it is unlikely that you will be able to complete the comparison without help. The EAC office can provide you with a contact at NIST that can assist you.

Founded in 1901, NIST is a nonregulatory Federal agency within the U.S. Commerce Department's Technology Administration. NIST's mission is to promote U.S. innovation and industrial competitiveness by advancing measurement science, standards, and technology in ways that enhance economic security and improve quality of life. For more information about NIST, visit their Web site at www.nist.gov or call them at 301.975.NIST (6478).

Networking. The possibility of fraudulently altering voting system software is based on the assumption that hackers have access to the system. This type of voting system attack can be avoided by never connecting the voting system to any network not under your complete control. This includes the Internet and any local network unless the network is wholly contained within your facility and is controlled by a trusted organization.

- ★ Never connect a voting system component to any network not under your direct control. All unused connections on the permanent systems should be sealed, precluding unapproved network, modem, USB, parallel, or other port connectivity.

Modem Transmission of Unofficial Results. The caution about not permitting network access does not apply to the use of modems on election night to transmit *unofficial* polling place results to the central office. The technical expertise required to intercept and alter a telephone communication without detection is extremely complex. Therefore, it is unlikely that anyone will be able to intercept and alter these results without detection. Even if the unofficial results are intercepted, it would make no difference in the final, official results since these should never be sent via modem. The official results should always be computed from the media that is physically transported from the polling place to the central office.

- ★ If modems are used to transmit polling place results to the central office, consider these results to be unofficial, and always verify them against the results on the media that is physically transported to the central office.

Audit Data. A voting system has several different audit logs. These logs contain a record of each event that occurs on the system from the time used to initially begin an election until the final

vote tally is completed. Audit logs on precinct-based voting equipment begin at the time the election media is inserted into the device until the election is closed.

- ★ Review the audit log documentation or obtain from your vendor a complete description of the audit logs that are available on the voting system. Familiarize yourself with the content of these logs and learn to print them out.
- ★ As part of pre- and post-election activities routine, print and examine these audit logs.

Policies and Procedures

A well-defined procedure for monitoring each person with access to the voting system should exist.

Examples of criteria to apply to voters who have access to the voting system are as follows:

- ★ A clear definition exists of who exactly qualifies as a voter.
- ★ A system exists for maintaining a record of each voter (i.e., the registration system).
- ★ A record is maintained of each time the voter uses the voting system.
- ★ The voter can use the voting system only at a specified, well-defined time (i.e., in-person absentee voting, in-precinct voting, early voting, etc.).
- ★ The voter must follow a well-defined and rigorously enforced procedure before he or she can use the voting system.
- ★ The voter's use of the voting system is restricted to only one function on the voting system: casting a ballot.

Equally specific procedures should be developed for each person that has access to the voting system. This includes elections office staff, vendor personnel, and visitors.

- ★ Require positive identification of each person that requests access to the voting system.
- ★ Keep a log of everyone that accesses the voting system. This should include the person's name, the date and time the access begins, the purpose of the access, and the time the access ends.
- ★ Access log entries should be written by someone other than the person accessing the system. The entries in this log must be complete and detailed.

For example, "System Maintenance" is not an acceptable entry. The entry should state the exact maintenance performed and the reasons why it was performed.

Elections Office Staff. Elections office staff should only be allowed the level of access to the voting system that is necessary for them to perform specific tasks related to their job description. Do not issue a staff member a password that will allow him or her to perform functions on the voting system that he or she is not authorized to perform. It is highly recommended that whenever possible, elections staff work in pairs. This procedure will greatly reduce the potential for accidental errors and virtually eliminate any opportunity for deliberate mischief or fraud.

Vendor Personnel. There is no such thing as "routine system maintenance." The vendor can void the voting system's Certification by making a change to the system that has not been approved by the State or the EAC.

- ★ Never allow vendor personnel access to your system until you are absolutely certain that any change, upgrade, or maintenance they intend to perform has been approved by the State or the EAC. All approved modifications or upgrades to an EAC certified voting system are documented with a certificate. If the vendor cannot produce a copy of this certificate do not allow him or her to access the voting system. When in doubt, call the EAC for clarification.
- ★ Never allow vendor personnel to access the voting system unless a member of the election staff is present. Although it is recommended that election office staff work in pairs, it is essential that the vendor never be allowed access to the voting system without a member of the election office staff present. Emphasize to the vendor that this requirement is as much for their protection as it is for yours.

Everyone else. There is absolutely no reason—*Never, Under Any Circumstances*—to ever allow anyone other than election office staff or vendor personnel access to the voting system. A consultant working under contract to the election office is considered election office staff; however, consultants should be monitored as closely as vendor personnel.

Password Maintenance

Effective use of passwords is essential to the overall security of a voting system. The first step in managing passwords is to know exactly what password capability is available on the voting system. The EAC Voluntary Voting System Guidelines Section 7.2.1 General Access Control Policies states, “...the vendor shall provide a description of recommended policies for effective password management.” Obtain this description from the vendor and provide a copy to every employee authorized to access the voting system.

The following sections provide guidelines for effective password management.

Password Administrator. Designate someone in the election office as the password administrator, either the Chief Election Officer or a senior member of the staff. The password administrator’s duties are as follows:

- ★ Issue passwords.
- ★ Maintain a master list of all passwords issued.
- ★ Reissue all passwords periodically.
- ★ Monitor password usage.

Issuing Passwords. Passwords issued to employees should only allow them access to the portion of the system required to do their job. The password administrator or the individual employee can make up these passwords. Passwords should have the following characteristics:

- ★ Passwords should be at least six characters long, preferably eight.
- ★ At least one character should be an uppercase letter.
- ★ At least one character should be a lower case letter.
- ★ At least one character should be numeral.
- ★ At least one character should be a special symbol.

Remember that passwords are case sensitive. For example, ABC*123# and Abc*123# are different passwords.

Passwords should be easily remembered (so there will be no need to write them down) yet sufficiently vague that they cannot be easily guessed. It is best to avoid the use of personal information (name, date of birth, anniversaries, pet’s names, etc.) and the use of real words (certain technology enables individuals trying to predict passwords the capability of trying every word in the dictionary). It is best to use a mix

of different character types (uppercase, lower case, numbers, and symbols).

Never issue a system password to anyone other than an election office employee, not even vendor representatives. If someone other than an election official needs to access the system, either have an election official log in for him or her or create a dummy password and then delete it as soon as the session is over. (Remember, someone from the elections office staff should monitor all vendor and consultant access to the system and log this activity, including date, time, names, and reason for access.)

Maintaining a Master List of Passwords Issued. It is OK to allow individual employees to make up their own passwords; however, they must submit their passwords to the password administrator for inclusion in the master list. The password administrator should verify that the passwords comply with the requirements above. The password administrator should compose a master list of all passwords issued. A printed copy of this list must be kept in a safe and secure place and should only be used in the event of an office emergency. Even in the event of an emergency, use of the list should be restricted to the Chief Election Official and the password administrator.

“Safe” and “secure” do not mean the same thing. A fireproof filing cabinet may be safe, but it is not secure unless it is locked and access to the key is restricted to the Chief Election Official and the password administrator. Similarly, an encrypted file as a backup on a disk drive may be secure, but it is not safe. Disk drives can fail.

Reissuing Passwords on a Periodic Basis. Password protection is good but not infallible. All passwords should be changed on a periodic basis. A recommended period is one election cycle or at least once a year.

Monitoring Password Usage. Election employees’ password usage should be monitored. Devise monitoring activities that are appropriate for your office, but consider things such as the following:

- ★ Watch for passwords on post-it notes posted on the side of monitors or in desk drawers. To avoid this, choose passwords that are easy to remember. Remind staff that if they do forget their password they can get it from the password administrator.
- ★ Review audit logs to verify that employees are working only within their assigned responsibilities.

Most systems allow employees to change their password at any time. Require that employees obtain prior permission from the password administrator before changing their password. Perform random checks to verify that passwords are changed with the password administrator's approval. One verification option is for the password administrator to attempt to log in with each employee's password in the master list. If the password has been changed, the password in the master list will be invalid.



CHAPTER 3

PHYSICAL SECURITY

Introduction

In elections, physical security refers to standards, procedures, and actions taken to protect voting systems and related facilities and equipment from natural and environmental hazards, tampering, vandalism, and theft. Physical security safeguards are required for voting systems in storage, in transit, in the polling place, and in use on Election Day through the post-election certified canvass.

Documentation of the election process, from election setup proofing documents to logic and accuracy testing, is the foundation for security in elections. This documentation, required by full-time staff during the pre-election stages and by poll workers on Election Day, provides the audit trail for the election and establishes proof that all components of managing the election were secure at all times. This documentation may also serve as the official court record in the event of a recount or contested election.

This section documents plans, policies, and procedures to manage the various election administration processes and voting system security vulnerabilities. State and county election commissions and municipalities should review these plans, policies, and procedures and consider incorporating them into their local processes.

Conducting a Security Review

One of the most important proactive steps election officials can take is to conduct an election security review. By walking through procedures, performing physical inspections, and considering all aspects of security, including local information systems security practices, possible threats and vulnerabilities can be identified. An election security review identifies key areas where election officials should take steps to ensure the security and integrity of election administration.

The following activities should be part of an election security review:

- ★ Review overall policies to ensure proper separation of job duties throughout the election administration process.
- ★ Perform an election administration risk assessment. Identify potential opportunities in the election administration process where election security and integrity is vulnerable to destruction, disruption, tampering, or corruption from internal or external sources. Examples include building fire, power failure, after-hours theft, malfunctioning sprinkler system, misprinted ballots, paper ballots counted twice, bomb scares or terrorist acts, failure of election boards to report for duty, disruptions by voters or poll agents, and so forth. List the potential security exposure and the impact on the election from each threat. Consider whether the likelihood of each threat is high, medium, or low, and develop plans to mitigate or eliminate each threat starting with those considered high.
- ★ Review the audit trail from the last election in its entirety. Analyze whether sufficient documentation exists to validate the integrity of the election.
- ★ Conduct a debriefing to identify lessons learned about issues and problems encountered in previous elections. This activity should become a regular part of closing out each and every election.
- ★ Inventory the list of procedures used throughout the election administration process. Evaluate each procedure to determine whether it needs to be updated based on the security review.
- ★ Evaluate the security of the computer systems used in election administration by conducting an information systems security assessment.
- ★ Perform a physical security review to assess access and controls of all office and storage facilities used

in the election administration process. Consider the relative security of other agencies sharing the facilities. Evaluate disaster recovery, terrorism, and weather-related considerations, and develop a plan to mitigate such risks. Also consider involving local or State law enforcement agencies.

At no point in the security review allow a person to validate their own security procedures and functions. Use the two-person accountability principle and have the procedures reviewed by someone other than the person who does the work. This objectivity will enhance faith in the integrity and honesty of the review.

Engage County and Municipal IT Staff. Elections are, at their core, an information system comprised of processes, people, technology, and data. Engage county and municipal IT staff or local community college or technical school staff to assist in the security review and to help establish and implement applicable election management system security measures. They should be familiar with many of the vulnerabilities and risk management steps related to information systems and can be of valuable assistance. Include county or municipal IT staff or local community college or technical school staff early on in the process and on a continuing basis.

Review Equipment Storage, Logistics, and Maintenance. The election administration security risks associated with voting systems equipment go beyond the obvious concerns of theft and destruction. Everything from building security, access control, and configuration management of the voting system equipment is an important component in the overall election security.

- ★ Perform a physical security review to assess access and controls of the facility in which the voting systems equipment is stored and maintained. Maintain a key control list of all personnel with keys and access to the facilities. Maintain an access log including sign in and sign out dates and times of all personnel, including visitors.
- ★ Implement two-person integrity security measures when setting up the voting system equipment for an election. Never allow a voting system vendor or employee to have uncontrolled access of county election equipment storage and maintenance facilities.
- ★ Take into consideration long-term storage and security needs when designing storage and workspace.
- ★ Implement an effective asset management and inventory control system for all components of the voting system. Consider testing procedures and sign off on all equipment returned from the vendor after maintenance to ensure proper versions of the equipment hardware, software, and firmware.
- ★ Nongovernment officials should never be allowed to have unattended or unmonitored access to stored voting equipment. Government election officials should be responsible for maintaining the access log and supervising the activity.

Steps to take when conducting an election security review:

- ★ Create or update the master election audit trail checklist to ensure it identifies all required audit trail documents for an election.
- ★ Review all election audit trail checklists to ensure they incorporate two-person integrity security measures such as dual sign-off.
- ★ Review election commission work areas to ensure office space is appropriately isolated and undetected access by unauthorized individuals is not possible.
- ★ Review voting equipment storage and work areas to ensure only authorized personnel have access.
- ★ Review the list of personnel who have keys to election office work areas and voting equipment storage to ensure all keys are accounted for and only authorized personnel have keys. Eliminate the distribution of master keys or key cards. Instead, issue access keys or key cards to personnel based on job duties and responsibilities, ensuring that individual staff members do not have the ability to enter the office and access the voting system undetected.
- ★ Review chain-of-custody procedures, the use of tamper-evident seals, and inventory control/asset management processes to ensure voting units and associated equipment are properly and securely controlled and are accounted for throughout the election administration process.

Steps to follow for reviewing equipment storage, logistics, maintenance, and security procedures:

- ★ Ensure physical, tamper-evident seals are employed throughout the election administration process.

- ★ Review storage and maintenance facility property insurance to ensure coverage is appropriate and adequate.
- ★ Review inventory control/asset management processes.
- ★ Create or update appropriate procedures to ensure absentee and emergency ballot blank paper stock are controlled at all times.
- ★ Review other facilities shared with voting equipment storage, logistics, and maintenance for potential security vulnerabilities.
- ★ Develop physical security procedures and safeguards to document the controlled physical access to voting systems and the facility or facilities where they are housed.
- ★ Document all security related repairs and modifications to the physical components of the facility where voting systems are stored (i.e., walls, doors, locks, cameras, alarm systems, etc.).

Security—Personnel

Another important factor in determining the vulnerability of a system is the people involved; it is they who must implement security policies and procedures and defend against any attacks.

- ★ Qualification guidelines should be established for choosing the person(s) for operating and administering (creating databases, defining ballots, testing, and maintaining equipment) the voting system.
- ★ Perform background checks on election officials authorized to define and configure elections and maintain voting devices to minimize the risk of election tampering.
- ★ Custodians of voting machines must be fully competent, thoroughly trained, and sworn to perform their duties honestly and faithfully.
- ★ Develop a detailed “Rules of Security Behavior” sign-off sheet for all levels of personnel responsible for using the voting system (election director, chief judges, poll workers, rovers, field technicians, etc.) and maintain a copy of the signed forms on file.
- ★ Establish policies and procedures for visitors and observers. At minimum, these procedures should include employee-monitored entrances and exits with a sign-in/sign-out log and issuance of a numbered visitor badge to be worn at all times.

To effectively manage a polling location on Election Day, establish the number of personnel needed and their duties.

- ★ Maintain separation of duties for poll managers to provide “checks and balances” during the election process.
- ★ Incorporate two-person integrity security measures to polling place procedures.
- ★ Provide adequate security of election equipment at the polling place at all times.

Security—Paper Ballots

Protecting the security of paper ballots is also a component of providing physical security. Election administrators should have a documented plan in place to provide for the management of optical scan or paper ballots, ballot-on-demand ballots, and all ballot stock. This plan should include details pertaining to the audit trail and chain of custody for the ballots with strict control over the ballots and ballot stock at all time.

- ★ The security of paper ballots includes security in the election office facility and at the polling place on Election Day. At least two election officials should oversee all processes, including the transfer of ballots and other election materials from the polling place to the central office.
- ★ Two or more staff members should receive the ballot order and verify the accuracy and quantity of ballots against the ballot order request. Once validated, the ballots should be stored in a secure building with restricted access in a secure area.
- ★ Ballot-on-demand is often used to supplement printed ballot stock. If used, election officials should implement internal controls to safeguard ballot stock from fraudulent or inappropriate use. For example:
 - Two or more election officials should monitor, record, and balance daily ballot-on-demand activity.
 - Election officials should reconcile the number of blank ballots received from the vendor, the number printed or spoiled, and the number of unused ballots.

Security—Voting Equipment and Peripheral Devices

Voting Equipment Storage (Warehousing/Staging Facility) and Inventory Control

Physical security of all voting system equipment and peripheral devices must be maintained at all times. The security measures should include the following:

- ★ Maintain complete and accurate inventory of all voting system equipment. This includes voting devices, optical scanners, communication equipment, supervisor or administrator devices, ballot activation devices, and storage media.
- ★ Assign personnel the responsibility of maintaining accurate inventory.
- ★ Provide physical access control to the storage facility only to authorized personnel. Following is a list of recommendations:
 - Make sure all personnel have signed security agreements on file.
 - Each staff member should be issued a unique code for entry and exit tracking. Staff members should wear identification badges at all times.
 - All visitors, vendors, and maintenance personnel should be authenticated through the use of appointments and identification checks in order to gain access to the voting system equipment.
- ★ If video cameras are used, schedule regular checks to verify they are fully operational.
- ★ Change keys or combinations on locks as necessary for each election.

It is recommended that the following information regarding the voting system equipment be tracked:

- ★ Equipment—Maintain a list of equipment, serial numbers, and quantity in the storage facility.
- ★ Machine Checkout—Maintain a list of voting system equipment that has been released from the storage facility.
- ★ Usage History—Maintain a history of elections for which each voting device has been used.
- ★ Repair History—Maintain a history of repairs to individual voting devices.

Inventory control should consist of tracking the voting system equipment when it is being—

- ★ Released and returned for any official election.

- ★ Released and returned for any demonstration of an election.

- ★ Accepted from or returned to the vendor (including warranty and maintenance repairs).

A barcoding system should be explored as a method for tracking the location of voting system equipment. All electronic media, regardless of type (memory packs, compact flash cards, PCMCIA (Personal Computer Memory Card International Association) cards, voter card encoders, supervisor cards, and key cards) should be *permanently* identified with a unique serial number. The serial numbers should be recorded as part of the internal inventory audit trail.

A “Voting Equipment Delivery Sheet” should be used to record and track equipment delivery information, description of equipment (including serial numbers), and signatures of equipment handlers or recipients.

Voting Equipment Storage (Warehousing/Staging Facility)—Access Control

- ★ Voting devices must be kept in a locked (secured) facility.
- ★ Access to the storage facility should be restricted to only authorized personnel. Access should be restricted through the use of badges, door entry access devices, and monitoring systems. The best method of access control is one that uniquely identifies the person, authorizes entry, and logs the date and time of access.
- ★ The storage facility should be equipped with monitored security and fire alarm protection.
- ★ For additional security, the facility could be monitored by video cameras.

Consider the following questions:

- ★ What procedures are in place to assure the physical security of voting machines and paper ballots before an election?
- ★ How and where are equipment, ballots, and ballot stock stored? How is the facility secured against theft, tampering, and vandalism?
- ★ What protections are in place to assure access is permitted only for authorized personnel?
- ★ Who installs equipment upgrades, a county official or a vendor?

- ★ Do vendors ever handle any voting equipment?
- ★ If vendors are allowed to handle voting equipment pre-election, are county officials required to be present?
- ★ Has the physical security of the voting equipment, ballots, and other election material been protected against terrorism and other “Homeland Security” issues?

Security—Election Process

Securing the Voting Devices During Preparation and Transport to Precinct

- ★ The voting devices should be secured with tamper-proof numbered seals. Access to the voting devices’ power control and election results storage media should be secured (controlled) within the voting device. The serial number of all seals should be recorded for verification during precinct setup.
- ★ It is recommended that for each voting device, records are kept of the following:
 - The serial number of the voting device.
 - The serial number of all seals used to secure the voting device for delivery.
 - The number registered on the protective counter.
 - The serial number of the seal used to secure the voting device after the polls have closed.
- ★ Develop an operational plan defining what will be delivered, where, by whom, and when. Use delivery sheets to keep track of the exact polling place each voting device is delivered to.
- ★ It is strongly recommended that the auxiliary voting equipment and supplies (ballot activation devices, administrator devices, communication equipment, seals for poll closing, etc.) remain in the possession of election officials until the opening of the polls on Election Day. If the voting devices are delivered to the polling location before Election Day, they must be secured at the polling location (e.g., cabled together and locked or secured in a locked room). Any other voting equipment or supplies should also be secured. Designated poll manager(s) should verify receipt and sign-off on the delivery of voting devices and necessary election supplies (ballot activation devices, administrator devices, communication equipment, closing seals, etc).

- ★ Voting systems should be moved in a controlled transportation mode. In other words, they are locked and sealed in any vehicle or container at the beginning of the transportation and unsealed at the delivery point. Sealing and unsealing should be logged and completed only by election officials.

Consider the following questions:

- ★ Are voting equipment and ballots transported to polling places by county officials or poll workers?
- ★ How and when are voting equipment and ballots transported to the polling places?
- ★ If poll workers transport voting equipment and ballots, when do they receive the equipment and ballots? If poll workers receive the voting equipment and ballots significantly in advance of the election, how and where are the materials stored until the election?
- ★ Are detailed logs kept of who takes custody of equipment and ballots and those person(s) contact information?
- ★ How are voting equipment and ballots secured from tampering from the time they leave election office custody to the time they are delivered to the polling places?
- ★ Are serial numbers or other secure, tamper-proof devices or seals placed on all ports where memory cards are inserted?

Securing the Voting Devices During Walk-In Absentee/Early Voting

- ★ Walk-in absentee voting devices should be prepared, tested, delivered, and set-up in the same manner as voting devices used on Election Day.
- ★ The same walk-in absentee voting storage media should be placed in the same voting device every morning and removed every night.
- ★ The voting storage media should be secured each night in a tamper-proof location, preferably within the election office.
- ★ Voting devices should be closed, sealed, and secured at the end of each day. The number on all protective seals and public counters should be recorded. In addition, seals and counters should be verified before the voting devices are used for voting the next morning.

Securing the Voting Devices During Mobile Absentee/Early Voting

- ★ Mobile absentee voting devices should be prepared, tested, delivered, and set up in the same manner as voting devices used on Election Day.
- ★ Voting devices should be closed, sealed, and secured at the end of each day. The number on all protective seals and public counters should be recorded. In addition, seals and counters should be verified before the voting devices are used for voting the next morning.
- ★ The mobile unit containing all voting devices should be returned to the Election Office every evening and stored within a secured facility.

Securing the Voting Devices on Election Day—Precinct Setup

- ★ If voting devices and election supplies are delivered to the polling place by anyone other than poll managers, the poll manager(s) should verify the serial numbers of all voting devices and necessary election supplies (ballot activation devices, administrator devices, communication equipment, closing seals, etc.).
- ★ Designated poll managers should verify voting device numbers and the numbers of all seals and tamper-resistant tape on all voting devices and inspect the voting devices for evidence of tampering. This should be a two-person integrity security process and all poll managers should sign-off on this validation.
- ★ Voting devices setup should be as follows:
 - Access to the voting devices' power control, counter controls, and election results storage media must be controlled within the voting device and inaccessible to the voter.
 - Voting devices exterior should be in plain view of the poll managers at all times.
- ★ Poll managers should maintain control of all administrator and ballot activation devices.

Consider the following questions:

- ★ How are poll workers trained to be alert for signs of pre-election tampering?
- ★ How are poll workers trained to respond if tampering is suspected or discovered?

Securing the Voting Devices on Election Day—Opening the Polls

- ★ Poll managers should activate each voting device, including the following:
 - Verify date and time and precinct on the voting devices.
 - Verify the protective seals and public counters on the voting devices.
 - Verify that the electronic paper audit trail is functioning.
- ★ Poll managers should secure administrator devices and communication equipment during the day.
- ★ The poll manager and all poll workers should sign-off on a checklist to verify all opening procedures were followed.

Securing the Voting Devices on Election Day—Voting

- ★ The area around the voting devices must be secure at all times. Only poll managers, legally authorized personnel, and registered voters should be allowed in the voting device area. A voter should not be allowed to enter this area until a voting device is available for his or her use.
- ★ Each poll worker should have a clearly defined role so voters are able to clearly identify them and their particular responsibilities as they move through the polling place.
- ★ Provisional voters should be directed to a separate check-in table or area. This assures that provisional ballots are handled uniformly and also establishes ballot accountability for auditing purposes.
- ★ The poll manager must maintain control of the ballot style identification device (card, slip, tag, label, ticket) and the ballot activation device.
- ★ Poll managers should periodically inspect the voting devices for any damage or tampering and to ensure the device is powered by electricity.
- ★ Poll managers should perform periodic verification of the number of voters processed to the number of votes recorded (public counter) on the voting devices and balance that number to the total number of signatures in the poll book.

Consider the following questions:

- ★ Are poll workers trained to ensure that voter lines form at the registration table and not at the voting

devices, especially during periods of heavy volume?

- ★ Are poll workers trained to issue a voting activation card to a voter only when a voting station is available for use?
- ★ Are “troubleshooters” available to visit and roam polling places on Election Day to provide support to poll workers?

Securing the Voting Devices on Election Day—Poll Closing

- ★ Poll managers should validate that the number of ballot activation devices and voter activation cards issued to the polling place are collected and secured in a transport case for return to the local election office.
- ★ The voting devices should be secured using the numbered “closing” seal. The signed affidavit should be returned by a poll manager to the local election office with the number of the closing seal, number voting devices, number of the public and protective counter, and the voting precinct recorded on the envelope.

Securing the Voting Devices During Tallying

- ★ At the end of the day, print out end-of-day vote totals from each individual voting device and deliver the printed tapes to the local election office in a secure manner.
- ★ The election result storage media from all voting devices within the polling location should be accounted for and reconciled.
- ★ The election result storage media and printed tape(s) should be secured in a numbered, sealed pouch and transported from the polling place to the local election office or designated collection point.
- ★ If transmitting unofficial election results by modem, (1) print end-of-day vote totals from each device, (2) limit access control to the telecommunication devices, (3) enable modem access only when uploads are expected, and (4) apply sufficient encryption and verification of data to protect the transmission of vote tallies.
- ★ Establish procedures to securely transport election results from optical scanners to vote tabulation computers if the optical scanners are located in a different location from where the vote tabulation takes place.

Security the Voting Devices During Tabulation at the Election Office

- ★ Election officials should perform a verification of results transmitted by modem to the county election office through a separate count of the election result storage media containing the original votes cast.
- ★ The offices where the vote tabulation is being conducted must be secure. Do not allow unauthorized and unescorted personnel to be in contact with the tabulation equipment. Only authorized election officials should be allowed in the tabulation equipment room.
- ★ Consider the use of video monitoring to secure the vote tabulation area.
- ★ Consider uniformed security or police officers to secure the ballot room and voting equipment.

Consider the following questions:

- ★ Are all paper ballots and electronic election media in the possession of at least two election officials or poll workers (using the two-person accountability principle) during its transport to the central or remote count locations?
- ★ Is the election tabulation process secure by protecting the premises where the vote tabulation is being conducted? Are unauthorized and unescorted personnel allowed to be in contact with the tabulation equipment?
- ★ What physical security measures have been implemented for the room containing the computer running the tabulation software?
- ★ Are printed result tapes and a backup copy of the tabulations in locked storage in a secure location?
- ★ Is there a complete chain of custody with two-person integrity security measures for all election materials?

Securing the Voting Devices During Transport to Storage

- ★ Only designated personnel should transport voting devices to the local storage facility. Custodians of the voting devices should verify receipt of all devices, confirm that the devices have not been tampered with during transport, and sign-off on the receipt of the voting devices.

- ★ Only designated personnel should transport election supplies (administrator devices, ballot activation devices, communication equipment, etc.) to the local election office. A local election official should verify receipt and sign-off on the delivery of the election supplies.

Securing the Voting Devices During Storage and Post-Election

- ★ Local election officials should maintain an inventory of election materials. These materials should be securely stored until the period of election protest and appeals has ended.

Election materials include the following:

- Voting devices (including memory cards where applicable).
- Administrator and ballot activation devices.

- Seal envelopes.
 - Voter registration (poll) lists.
 - Election result tapes and printouts.
 - Field supervisor and rover reports.
 - Poll worker daily logs.
 - Reconciliation reports.
 - Audit data (includes retention of the completed master election audit trail checklist mentioned on page 16).
 - Voting Equipment Delivery Sheets (mentioned on page 29).
- ★ Two copies of the inventory list should exist; one list should remain stored with the election materials and one list should be kept at the local election office. The local election official should verify and sign the inventory list.



CHAPTER 4

ACCEPTANCE TESTING

Introduction

Acceptance testing of voting systems is perhaps the most important function that local election jurisdictions undertake in order to ensure the security and accuracy of their elections. Acceptance tests must be conducted under the strict control of the chief election official of the jurisdiction. Under no circumstance should acceptance tests be conducted by a manufacturer.

An acceptance test is defined as a test that is performed on an individual unit of a voting system in order to verify that the unit is physically, electronically, mechanically, and functionally correct. Correct, in this sense, means that the unit is identical in every respect, including software/firmware to the unit that was originally purchased.

Acceptance testing provides assurance that the voting system is functioning correctly, that the voting system complies with the conditions of the product acquisition document, and that the voting system is correctly configured for use in an election. If initial acceptance testing is successful, the test documentation becomes the first item in the chain of custody for the elements that comprise the voting system. Later, if a component of the voting system leaves the election officials direct control for any reason (i.e. repair, upgrade, etc.) a repeat of the initial acceptance test serves to re-establish your chain of custody for the component.

IMPORTANT REMINDER ★ ★ ★

A certified voting system consists of a specific set of hardware/software/firmware, the specific version of the operating system, and the specific versions of any support software. In order to conduct acceptance tests you must know the version levels of each of these components.

It is extremely important that election officials maintain a complete record of every acceptance test conducted on your voting system. These records should contain the device identification including software/firmware version, the date of the test, the name of the tester(s), and the outcome of the test. If the device passes the test no further information is necessary. If the device fails the acceptance test, the test documentation should contain a detailed description of the reason for the failure. If the failed device is returned to the manufacturer for repair, it is recommended that a copy of the test documentation be returned with the device.

Keeping all documentation on your election system in a single, easily accessible place can aid your management decisions. Ideally, you should build a database that can track the components of your system throughout their life. In it you would store the results from every acceptance test conducted, all election-related performance data, all chain-of-custody data, etc. This database becomes a single place to track each component of the voting system by serial number.

Request for Proposal and Contract Considerations

Planning for acceptance testing begins with the development of the Request for Proposal (RFP). The RFP should require that the vendor's bid proposals contain a recommended acceptance test script for each device contained in the proposal and an acceptance script for the overall voting system.

The RFP should specify that the proposed scripts must apply equally to all devices of a given type. For example, if the script is for a DRE voting station it must apply uniformly to all DRE voting stations. Do not accept a script that calls for a rigorous test of some subset of the DREs and only a cursory inspection of the rest.

The manufacturer's proposed acceptance test scripts will generally not be entirely satisfactory, but they will provide election officials with a solid basis for developing their own scripts.

Contracts for voting systems usually include a progressive payment schedule that calls for the total value of the contract to be paid in a series of payments based on measurable deliverables, such as hardware delivery, software installation and testing, etc. One of these payments should be based on completion of successful acceptance testing of *all* devices that make up the voting system and a successful acceptance test of the *overall system*.

RECOMMENDATION The final payment should be based on the successful completion of the first election held using the voting system.

Acceptance Tests

There are three distinct parts to an acceptance test: a test for physical integrity, a diagnostic test of the various hardware features, and a test for functional characteristics. This last test includes a test of the various software/hardware modules that control the unit.

Acceptance tests must be conducted on *every* unit of your voting system every time a unit leaves your control and is returned. For example, if you loan a voting station to a civic club for a demonstration or send a unit of the voting system out for repair. Note that this does not include functions under the control of staff of the elections office. If you have a large number of devices this may be a tedious and time consuming task. Fortunately, as with most tedious and time consuming tasks, acceptance testing usually proceeds more quickly as the testers gain experience with the voting system. In some instances, an experienced tester can perform an acceptance test on a touch screen voting station or a ballot scanner in less than fifteen minutes.

In the course of an acceptance test, the tester may experience problems that can be easily corrected by the tester such as an incorrect time or date or a poorly calibrated touch screen. This is not a cause for terminating the test. In these cases, the tester should correct the problem and continue the test. However, the problem should be noted in the unit documentation.

Physical Analysis: This portion of the acceptance test is performed to assure that the voting unit is not physically damaged and that all physical components are working properly. The specific tests will vary based on the particular voting system; however, some typical items will include:

- ★ Examine the outer shell or case for any sign of damage such as dents or cracks.
- ★ Check that the top and bottom of the shell mate easily, that all doors open and shut easily, etc.
- ★ Inspect all latches and hinges. Latches should open and shut without binding.
- ★ Hinges should operate smoothly and be inspected to insure that hinge pins are not easily removed.
- ★ All locks should open and close without binding.
- ★ Inspect all electrical wires and connectors for damage or signs of wear.

Diagnostic Analysis: This portion of the acceptance test is performed to assure that all of the mechanical and electronic components of the voting unit are operating correctly. Again, the specific tests will vary based on the particular voting system; however, some typical items will include:

- ★ Test all input/output devices. This will include any voter card readers, printers, PC card slots, etc.
- ★ Test the connections that support any accessibility devices. If accessibility devices use a serial port, use a loop-back connector to test this port.
- ★ On ballot scanners verify that the ballot feed path is properly set and that ballots will feed without binding.
- ★ On touch screen devices verify that the screen is calibrated correctly.
- ★ If there are controls that the voter can use to change brightness or intensity, verify that these controls are working properly.
- ★ If the device is a commercial computer, verify that the floppy disk drives, CD/DVD drives, PC Slots, etc. are working properly.
- ★ If the devices record date and time, verify that the date and time are correct.

Functional Analysis: This test is performed to assure that the correct Federal and State certified version(s) of the software/firmware are installed in the voting unit and that the system will perform correctly

during an election. This test consists of loading a mock election onto the unit, casting a known pattern of votes, closing the election, printing the reports, and then comparing the test results with the known vote pattern.

The following sections provide a generic outline for developing an acceptance test for the most common devices found in an electronic voting system. In each of the tests described below, you will need to setup a mock election. This mock election does not need to be long; however, it should exercise the features of the voting unit being tested. If your jurisdiction allows straight party voting, straight party voting with cross-over, multiple representative districts (i.e. vote for n of m), etc. then these types of contests should be included in your mock election.

Acceptance Tests for Optical Scan Ballot Scanners

This section describes an acceptance test for a stand-alone ballot scanner. The scanner should be set up for this test the way it will be set up for use in a precinct.

Materials Required: In addition to the following, you must know the version of the operating system and/or firmware that was certified for your ballot scanner.

- ★ A memory card or other device that is used to configure the ballot scanner for an election. This device must contain the election setup for the mock election that you will be using to test the scanner.
- ★ The password, manager card, or other device that is used to gain manager/administrator privilege on the scanner.
- ★ A test deck of pre-marked optical scan ballots for the mock election. This test deck typically contains one ballot with a vote for the first candidate in each race, two ballots with votes for the second candidate, three ballots with votes for the third candidate, etc. For 'yes' or 'no' questions, vote 'yes' on the first ballot and 'no' on the next two ballots. Do not vote this question on subsequent ballots. Although most ballot printers can supply you with this test deck; it is recommended that these ballots be hand prepared using the marking device noted by the system manufacturer.

Physical Analysis: This analysis is conducted with the scanner turned **off**.

1. Examine the case and/or cover for cracks or dents.
2. Inspect latches, hinges, carrying case, wheels, etc.
3. Examine the legs and/or stand. The legs and/or stand must operate smoothly without binding.
4. Inspect the power cord and plug for any frayed insulation or damaged connectors.
5. Verify that there is sufficient paper in the printer to complete the test.

Diagnostic Analysis: This analysis is conducted with the scanner turned **on**. Some of these tests may require manager/administrator privilege.

1. Turn on the ballot scanner and, as it boots up, verify that the correct Federal and State certified version of the operating system and software are installed. This information may only display on the screen briefly. If you miss it, turn the scanner off and then re-boot.
2. Verify that the date and time set in the scanner are correct and, if not, correct them.
3. Be aware of time changes due to daylight savings time. If the daylight savings time will change between the time of this test and the next election, set the time on the scanner to compensate for this change.
4. Print a test pattern to verify that the printer is operating correctly. If your scanner does not have the ability to print a test pattern, the printer can be tested during the Functional Analysis.
5. Unplug the ballot scanner and verify that it will operate on the battery. If the scanner will not operate on the battery check to be sure the battery is fully charged before failing the scanner.
6. Verify that the battery charger will charge the battery.
7. Test all ports and card slots. If the scanner uses a serial port to communicate with the election management system, use a loop-back connector to test this port.

Functional Analysis: This analysis is conducted with the scanner loaded with the mock election and set for election mode. Turn the scanner on, load the mock election, and then set the scanner in election mode.

1. Be sure all vote totals are set to zero.
2. Print a zero tape.
3. Use the pre-marked test deck to accumulate a significant number of ballots (at least 25) on the scanner.

4. Close the election on the ballot scanner.
5. Print the results tape.
6. Verify that the vote counts on the result tape match the known results of the test deck.
7. Zero the vote counters and remove the mock election from the scanner.

Documentation: If the scanner experiences a failure during any of the above steps that cannot be corrected by the tester, terminate the test. Prepare documentation that lists the serial number of the scanner, the persons conducting the tests, the date, and a description of the failure. Make two copies of this documentation; one copy for your permanent record and another copy that stays with the scanner to assist the persons making any required repairs. Attach all printouts to the copy retained for your permanent record.

If the scanner passes all of the above tests, prepare **documentation** for your permanent record that lists the serial number of the scanner, the persons conducting the tests, and the date. Attach all printouts to this documentation.

RECOMMENDATION It is important to be able to look at a scanner and determine whether or not it has passed acceptance testing. One way to accomplish this is to attach a permanent, non-removable label to the back or underside of the scanner. This label should contain the serial number of the scanner, the date, and the name or initials of the testers.

Acceptance Test for Touch-screen Voting Stations

This section describes a typical acceptance test for a touch-screen voting station. The voting station should be set up for this test the way it will be set up for use in a precinct.

Material Required: In order to conduct an acceptance test, you will need the following materials. You will also need to know the version of the operating system and the software/firmware on your voting stations.

- ★ A memory card or other device that contains the mock election to be used for the test. This will be used to load the mock election into the voting station.

- ★ If the voting station uses a serial port to connect disability devices, you will need a loop-back connector.
- ★ A voter card or other device required to activate the voting station for a voter.
- ★ The password, manager card, or other device required for gaining manager/administrator privilege on the voting station.

Physical Analysis: This analysis is conducted with the voting station turned **off**.

1. Examine the case and/or cover for cracks or dents.
2. Inspect latches, hinges, carrying case, wheels, etc.
3. Examine the legs and/or stand. The legs and/or stand must operate smoothly without binding.
4. Inspect the power cord and plug for any frayed insulation or damaged connectors.
5. Verify that there is sufficient paper in the printer to complete the test.

Diagnostic Analysis: This test is conducted with the voting station turned **on**. Some parts of the test may require manager/administrator privilege.

1. Turn the voting station on and as it boots up verify that the correct Federal and State certified version of the operating system and firmware are installed. This information may only appear briefly on the screen. If you miss it, turn the voting station off and then turn it back on.
2. Verify that the date and time are correct and correct them if necessary.
3. Be aware of time changes due to daylight savings time. If the daylight savings time will change between the time of this test and the next election, set the time on the scanner to compensate for this change.
4. Check the calibration on the screen and re-calibrate the screen if necessary.
5. Print a test pattern to verify that the printer is operating correctly. If your voting station does not have the ability to print a test pattern, the printer can be tested during the Functional Analysis.
6. Examine the screen for condition and clarity.
7. Unplug the voting station and verify that it will operate on the battery. If the battery is dead, charge the battery and repeat this test.
8. Verify that the battery charger will charge the

battery and that any indicators that display charging condition and level of battery charge are functioning properly.

9. Test all card slots and input/output ports. If the voting station uses a serial port to connect the accessibility devices, test this port using a loop-back connector.

Functional Analysis: For this test the voting station is turned **on** and the mock election is loaded.

1. Verify that the mock election loaded correctly and that the ballot(s) contain all contests and candidates.
2. Set the voting station in election mode.
3. Print the Zero Totals tape.
4. Manually enter ballots that contain one vote for each candidate and issue. Continue to manually enter ballots until each candidate on the ballot has received exactly one vote and each issue has received one 'yes' and one 'no' vote.
5. Verify that each candidate has received exactly one vote and each issue has received one 'yes' and one 'no' vote.
6. If the voting station has the ability to automatically generate Logic and Accuracy ballots, use this feature to enter a total number of ballots that exceeds the number of ballots expected to be cast on a typical election day (usually about 150).
7. Close the election on the voting station.
8. Print the results.
9. Verify that the printed results exactly match the known number of votes cast for each candidate and issue.
10. Zero the totals and close the voting station.

Documentation: If during any of the above steps the voting station experiences a failure that cannot be corrected by the tester, terminate the test. Prepare documentation that lists the serial number of the touch screen unit, the persons conducting the tests, the date, and a description of the failure. Make two copies of this documentation; one copy for your permanent record and another copy that stays with the touch screen unit to assist the persons making any required repairs. Attach all printouts to the copy retained for your permanent record.

If the touch screen unit passes all of the above tests, prepare documentation for your permanent

record that lists the serial number of the unit, the persons conducting the tests, and the date. Attach all printouts to this documentation.

RECOMMENDATION It is important to be able to look at a voting station and determine whether or not it has successfully passed acceptance testing. One way to accomplish this is to attach a permanent, non-removable label to the back of the screen or underside of the voting station. This label should contain the serial number of the voting station, the date, and the name or initials of the testers.

End-to-end Voting System Acceptance Test

This test is sometimes referred to as a test of the election management system. In reality, it not only tests the election management system but also tests the ability of the election management system to interface correctly with the voting devices and to correctly count the votes and print reports. This test should be conducted on all newly acquired voting systems, and also after any event that has the potential to alter the voting system. Such events include replacing a disk drive or other component in the election computer and any time the election computer leaves your direct control and is returned.

IMPORTANT If you use a 'blended system', for example optical scan and touch screen for ADA, all components of the system must be included in this test.

Materials Required: You must know the correct Federal and State certified versions of the operating systems and software/firmware for your election management system and your vote gathering devices, scanners and voting stations. In addition, you will need the following:

1. An election management computer with your voting system installed.
2. If Touch Screen units are used:
 - ★ One Touch Screen voting unit,
 - ★ One blank Touch Screen Memory Card or other device used to load the election definition into the voting unit,
 - ★ One Touch Screen manager/supervisor card or other device used to obtain manager/supervisor access to the voting unit,

- ★ One Touch Screen voter card or other device used to initiate a voting session for a voter.

3. If Optical Scan Ballot Scanners are used:

- ★ One Ballot Scanner,
- ★ One blank memory card or other device used to load the election definition into the ballot scanner,
- ★ One set of pre-marked Optical Scan test ballots with known results. This can be the same test deck used to conduct acceptance tests on the ballot scanner.

4. All communications cables and devices necessary to connect the voting units and ballot scanners to the election management computer.
5. One blank disk or other device used by your system to record and store the election results.
6. One disk or other device containing your mock acceptance test election setup.

Prerequisite: The election management system consisting of items 1 through 4 above must be set up and tested before beginning this acceptance test.

NOTE It is acceptable to allow your IT staff or the manufacturer to do this setup because in the course of conducting the end-to-end test you will verify that everything has been set up correctly.

The Touch Screen voting unit and the ballot scanner should have previously completed acceptance testing. If not, run the Touch Screen voting station acceptance test and the ballot scanner acceptance test on these units prior to beginning this test.

Verify Correct Operating System and Election Management Software: Turn on the election management computer. As the computer boots up, verify that the correct Federal and State certified version of the operating system is installed. After the boot up is complete, verify that the correct Federal and State certified version of the election management system is installed. This can be accomplished by comparing the hash values of the installed voting system software with the hash values contained in the Web site of the National Software Reference Library maintained by the National Institute of Standards and Technology (<http://www.nsr.nist.gov/votedata.html>).

Verify the Election Management System Hardware:

Verify that all components of the election management computer are turned on and functioning properly. This includes such components as printers, communication devices, disk drives, etc.

Verify Voting System Functionality: This test will verify that the overall voting system is functioning properly. It will verify that the election management system will format media to setup the TS voting stations and OS ballot scanners, that votes cast on these devices can be uploaded to the election management system, and that these votes will be counted correctly.

1. Load the acceptance test database (election setup) on the election management computer.
2. Verify that the election management system will support the Touch Screen voting unit (If your voting system does not include Touch Screen units go to Step 3).
 - ★ Use the election management system to prepare the memory card or other device that is used to load the acceptance test mock election into the TS voting unit.
 - ★ Load the mock election into the voting unit.
 - ★ Open the election on the unit.
 - ★ Manually enter one vote for each candidate and one 'yes' and one 'no' vote for each issue on the ballot.
 - ★ If the Touch Screen voting unit has the facility to produce Logic and Accuracy ballots, use this feature to cast one set of Logic and Accuracy ballots.
 - ★ Close the election on the Touch Screen voting unit.
 - ★ Print the vote totals on the voting station printer.
 - ★ Use your standard method for transferring votes from the voting station to the election management computer to upload the votes from the voting unit to the election management system.
3. Verify that the election management system will support the Optical Scan ballot scanner.
 - ★ Use the election management system to prepare the memory card or other device that is used to load the acceptance test mock election into the ballot scanner.

- ★ Load the mock election into the ballot scanner.
 - ★ Open the election on the ballot scanner.
 - ★ Use the pre-marked set of optical scan test ballots to cast votes on the ballot scanner.
 - ★ Close the election on the ballot scanner.
 - ★ Print the vote totals on the ballot scanner.
 - ★ Use your standard method for transferring votes from the ballot scanner to the election management computer to upload the votes from the ballot scanner to the election management system.
4. Verify Printed Outputs.
- ★ Close the election on the election management system.
 - ★ Print the standard reports that contain the vote totals.
 - ★ Compare the results printed from the election management system with the results printed from the voting station and ballot scanner.

Documentation: If the voting system experiences a failure during any of the above steps that cannot be corrected by the tester, terminate the test. Prepare documentation that lists the serial number of the election computer and the serial number or other identifying information for any other component that failed, the persons conducting the tests, the date, and a description of the failure. Make two copies of this documentation; one copy for your permanent record and another copy that stays with the touch screen unit to assist the persons making any required repairs. Attach all printouts to the copy retained for your permanent record.

If the voting system passes all of the above tests, prepare documentation for your permanent record that lists the serial number of the voting system computer, the serial number of the Touch Screen voting unit, the serial number of the Optical Scan ballot scanner, the persons conducting the tests, and the date. Attach all printouts to this documentation.

RECOMMENDATION It is important to be able to look at a voting system computer and determine whether or not it has successfully passed acceptance testing. One way to accomplish this is to attach a permanent, non-removable label to the case of the voting system computer. This label should contain the serial number of the computer, the date, and the name or initials of the testers.

Conclusion

Acceptance testing on each machine delivered to a voting jurisdiction by a manufacturer is a critical step in the process of ensuring that electronic voting units used by voters on Election Day will function as intended. Although each manufacturer has internal quality control procedures, and although quality control should be guaranteed to some degree in the contractual agreement between the manufacturer and the voting jurisdiction, these procedures and guarantees are worthless unless the jurisdiction can proactively detect failures or non-functional systems at the time the product is delivered. Rigorous acceptance testing provides this detection mechanism.

RECOMMENDATION Your agreement with the vendor should include an understanding that the warranty on a unit of the voting system will not begin until the initial acceptance testing has been successfully completed.

SAMPLE FORM 4.1: TSX TOUCH SCREEN ACCEPTANCE TESTING PROCEDURES (Johnson CO. Kansas)

SERIAL NUMBER: (Left side of unit) 204404	Check off as completed. Note any discrepancies.
Inspect for physical damage, such as cracks.	
Write to the right the number of keys received with unit (if new).	
Unfold legs and stand unit up.	
Plug TS unit into electrical source.	
Plug polarity checker into "daisy chain" outlet only far enough for lights to come on. Confirm electrical. Remove polarity checker.	
Unlock PC card compartment on top left side. (turn key 3:00 to 6:00)	
Make sure that the nut on the inside of the key assembly is tight.	
Make sure that there is a red cover on the On/Off button. Power On by holding red button to count of 3. Open doors.	
Confirm that Boot Loader Release Build Date is April 19, 2004. If not, record the build date to the right.	
Confirm that Windows CE 4.10 Build Date is February 5, 2004. If not, record the build date to the right.	
Confirm that the ballot station is version 4.5.2 (lower right hand corner of screen). If not, record ballot station version to the right.	
Unlock printer compartment and bring forward. (turn key 12:00 to 3:00)	
Feed printer paper, if necessary.	
Insert Manager card. Enter (the password) and "OK."	
Confirm AC Online and write battery percentage to right.	
Touch "System Setup."	
Confirm Serial Number on Setup screen. Write on this sheet at top if necessary.	
Touch "Set Date."	
Touch the arrows to set the correct month, year, and time. Be careful of AM & PM. Touch the correct date on the calendar.	
Select Central Time from the drop-down list. Uncheck "Automatically adjust clock for daylight saving."	
Touch "Apply" after setting date, time, and/or time zone.	
Touch "OK" if no changes made or "X" to exit.	
Touch "Diagnostics." Touch "Test Printer."	
If printer does not print, push the whole printer to the right to confirm that there is a solid connection. You may also need to open the lid by pushing down on the gray lever—make sure that the hinges are seated correctly, tighten the paper roll, feed the paper, and snap the lid shut.	
After test finishes, touch "OK" for "Printer test PASSED."	
Attach loop back connector (slightly wider at top) to serial port located on the back of the unit. Touch "Test Serial Port."	

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SERIAL NUMBER: <i>(Left side of unit)</i> 204404		Check off as completed. Note any discrepancies.
On the Serial Port Test window, use the dropdowns to change the Baud Rate to 115200 and make sure "Flow Control" reads "Software." Touch "Test."		
When done, touch "OK." Touch "Done" to exit test.		
Remove loop back connector.		
Touch "Test Card Reader." Manager card is ejected.		
Remove the Manager card as requested. (DO NOT TEST THE MANAGER CARD. IT WILL BE ERASED.)		
Insert a voter card when prompted.		
Remove voter card when prompted. Re-insert Manager Card.		
Touch "Test Sound"—Touch "Play."		
After sound is heard, Touch "Close."		
Touch "Test Modem."		
On the Test Modem window, use the dropdown to change the Baud Rate to 115200 and make sure "Flow Control" reads "Hardware." Touch "Test."		
After test finishes touch "OK" for "Modem test PASSED."		
Touch "Done" to return to the Diagnostics screen.		
Touch "Done" to get out of Diagnostics screen.		
Touch "Calibrate."		
Touch the center of each target with your stylus. There are 3 targets for 2 passes. (Calibration is best if using something small enough to hit exact center of target.)		
After calibration is finished. Touch "OK" to exit System Setup.		
Touch "Exit Supervisor" to remove Manager Card.		
Hold red button to count of 3 to turn TS unit Off.		
Tear off printer tape. Fold in half and tape to the back of this form facing out.		
Close and lock both compartments.		
If needed, clean screen with nonabrasive, dry cloth (optical cloth).		
Return protective Styrofoam sheet to cover screen.		
Close side panels and lock with padlock specific to that machine.		
Unplug unit and fold up legs.		
Return unit to its location on the tables in the warehouse and plug in.		
TECHNICIAN:	DATE:	

SAMPLE FORM 4.2: TSX DIAGNOSTICS (Johnson County Kansas)

ELECTION: Summer 2005	SERIAL NUMBER: 216879	Check off as completed. Move unit to repair bench if it fails.
Inspect for physical damage, such as cracks.		
Flip machine over and extend legs (double first, then single). Twist gently to align bullets.		
Make sure "Property of" sticker is on back. Fold legs down & turn machine back over.		
Plug TS unit into electrical source. Unlock machine padlock.		
Examine padlock label. Take key & padlock to printer and make new label if needed.		
Make sure that AC light is yellow.		
Unlock PC card compartment on left side of unit. (Turn key from 12:00 to 3:00)		
Insert Tech PC card with tech label on top of card.		
Power On by pressing red button and holding to the count of 3.		
Confirm that the Boot Loader Release Build Date is April 19, 2004.		
Confirm that the Windows CE 4.10 Build Date is February 5, 2004.		
Confirm in lower right-hand corner that Ballot Station Version is 4.5.2.		
Unlock printer cover & raise printer. Make sure there is enough paper for diagnostics.		
Use yellow tape to tape printer around the bottom so that it is firmly against connection.		
Confirm that the touch screen says "AC Online" in the Power field.		
Insert Manager card. Touch (the password) and "OK." Touch "System Setup."		
Confirm that the number on the screen and the sticker on the left side of machine match. Write Serial number on this sheet if needed.		
Touch "Set Date." Select "Central Time" from the drop-down list if not already selected. Touch "Apply."		
If date/time is still not correct (daylight saving), reset by touching date and/or using arrows to set time, year or month. (Be careful of AM & PM.) Touch "Apply" if you reset anything.		
Uncheck "Automatically adjust clock for daylight saving time." Touch "Apply."		
Touch "OK" if no changes made or "X" to exit Date/Time Properties window.		
Record today's date and time here for proofing purposes.		
Touch "Diagnostics." Touch "Test Card Reader."		
Manager card is ejected. Remove the Manager card. Do not respond to Warning.		
Insert a smart card. (Do Not Test The Manager Card. It Will Be Erased.)		
Remove smart card when prompted after test.		
Reinsert Manager card. Touch "Done."		
Touch large "OK" at bottom of screen to save settings.		

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ELECTION: Summer 2005	SERIAL NUMBER: 216879	Check off as completed. Move unit to repair bench if it fails.
Touch "Exit Supervisor." Remove Manager card.		
Touch "Clear Totals." Answer "OK" to message.		
Touch "Test Count." Check "Not Using Voter Card."		
Touch "Count Test." Touch "Vote." Touch "Next."		
Vote for Red, White, & Blue and then one time for the first candidate in every race, except write in "yam" for favorite food.		
Touch "Cast Ballot." Touch "Close" on the "Select Precinct and Party" screen.		
Touch "Close" on the "Pre-Election Testing Mode" screen.		
Touch "Reporting." Answer "Yes" to "Print write-in candidates?"		
"PRINT LONG REPORT?"—answer "No."		
"NEED ANOTHER COPY?"—answer "No," unless printer did not print successfully.		
Tear off printer tape. Confirm machine number and 1 vote for Red, White, Blue, first candidate in each race & yam. Fold printout facing out. Paper clip to back of this form.		
Push red button & hold to count of 3 to turn unit Off. Use eject button to remove PC card.		
Make sure there is enough paper for manual L&A. Close and lock both compartments.		
Clean screen with dry optical cloth. Replace protective Styrofoam sheet over screen.		
Examine hinges & fold privacy panels in. Relock machine at top with its specific padlock.		
Put a plastic tie through the lower holes in the privacy panels as a marker that it is done.		
Remove colored dot from "foot" of machine.		
TECHNICIAN:		DATE:

Revised 5/31/05



CHAPTER 5

BALLOT BUILDING

Introduction

Correct and easily understood ballots are the foundation of a successful election. Building a ballot is part science and part art. The science is rather straightforward and will be presented in this chapter. The art is learned through experience.

A document such as this must be general in nature and cannot account for all of the differences in State and local election laws and regulations. You should seek, whenever possible, written clarification from the appropriate authority when implementing suggestions or recommendations contained in this chapter when a relevant law and/or regulation on point is ambiguous or inconsistent with that suggestion or recommendation, or its implementation.

This chapter is organized in five major sections. The first section discusses those issues that are common to all ballots. The next three sections discuss issues that are specific to touch screen ballots, optical scan ballots, and audio ballots. The final section addresses the testing and validation of the completed ballots.

General Ballot Considerations

Schedule Considerations: As you approach an election there are various time dependent events that have to occur. Some of these events are specified by law, such as the deadline for mailing absentee ballots, and others are dictated by necessity, such as the time it will take your printer to produce the printed ballots. Some events are dependent upon other events. For example, you cannot conduct Logic and Accuracy Tests until the printed ballots are available.

Your election supervisor will build and publish a schedule that contains all of the events leading up to the election. As a ballot builder you need to be very familiar with the dates on this schedule that affect the ballot building process.

Find out from your printer(s) the earliest and latest dates that they can accommodate receiving and printing your ballots. Note that the latest date must be sufficiently after the close of qualifying to allow you ample time to proof the finished ballots. Allow time to re-print any ballots that contain necessary revisions or errors. Be sure that these dates allow you to meet the requirements for public review and mailing absentee ballots.

Include in your schedule the dates that you will receive resolutions for Federal and State contests and the opening and closing of qualifying for local, State, and Federal offices.

Verify that the jurisdiction election database is up to date and update it if necessary. As soon as possible, you want to prepare the specific election database that contains everything except the names of the candidates and the specific wording of the questions and/or referendums. This database will contain the type of election, all precincts, districts, races, number to vote for, and method of voting (at large, etc.).

Jurisdiction Election Database: Almost all of the currently available computer-based election management systems have a provision for building a jurisdiction election database. This data base can be built well in advance of any specific election. It contains all of the political districts in your jurisdiction (precincts, county commission districts, school board districts, State legislative districts, congressional districts, etc.) and all of the offices that may be elected (county commissioners, State senators, State representative, US representatives). Once this database is built it remains fairly static; however, it can change as a result of re-districting; adding, deleting, or changing precincts; legislation; or court cases and should be reviewed before each election.

Specific Election Database: To plan for a specific election, the districts and offices to be included in the election are selected from the jurisdiction election database to create an election database. This database will contain the precincts, districts, and races that will form the election. This information in turn defines the ballot styles that you need to prepare and which ballot styles are assigned to which precincts.

Type fonts and sizes: The Guidelines presented below give recommendations for type fonts and sizes. However, your State may have laws and/or regulations that govern type font and sizes. Follow your State laws and/or regulations if there is a discrepancy between the Guidelines and your State laws and/or regulations.

Chain of custody for ballots: In the context of ballot building, chain of custody is the device that demonstrates that progression and integrity of the ballot from its original creation to its final destination. This includes a document that reflects the precise chain in the transmission, receipt, custody, control, transfer and eventual distribution of the ballots from its originating point; and the parties responsible for each step in the chain. The chain of custody should begin when the ballot is designed and continue to the final disposition of the voted ballots. The chain of custody should cover the printing of the ballots at the printing facility, during transportation, in the office before mailing, and when received. When developing your chain of custody assume that you are going to have a court challenge and that you will have to prove that your ballots were constantly in the possession of an election official or a sworn officer and that there was absolutely no time when anyone could alter any ballot, either before it was cast or afterwards.

General Considerations: When an instruction is based on a condition, state the condition first, and then the action to be performed. For instance, use “In order to change your vote, do X”, rather than “Do X, in order to change your vote.”

Use familiar, common words and avoid technical or specialized words that voters are not likely to understand. For instance, “... there are more contests and races on the other side ...” or “... vote both sides of the ballot ...” rather than “...additional contests are presented on the reverse ...”

Issue instructions on the correct way to perform actions, rather than telling voters what not to do. For example, “Fill in the oval for your write-in vote to count,” rather than “If the oval is not marked, your write-in vote cannot be counted.”

Address the voter directly rather than use passive voice constructions. For example, “remove and retain this ballot stub” rather than “this ballot stub must be removed and retained by the voter.”

Avoid the use of gender-based pronouns. For example, “...write in your choice directly on the ballot...” rather than “... write in his name directly on the ballot...”

Consistent with election law, support a process that does not introduce bias for or against any of the contest choices to be presented to the voter. In both visual and aural formats, the choices *shall* be presented in an equivalent manner. Certain differences in presentation are mandated by State law, such as the order in which candidates are listed and provisions for voting for write-in candidates. However, comparable characteristics such as font size or voice volume and speed must be the same for all choices.

Whenever possible, do not visually present a single contest spread over two pages or two columns. Such a visual separation poses the risk that the voter may perceive one contest as two, or fail to see additional choices. If a contest has a large number of candidates, it may be infeasible to observe this guideline.

Clearly indicate the maximum number of candidates for which one can vote within a single contest.

The relationship between the name of a candidate and the mechanism used to vote for that candidate should be consistent throughout the ballot. For example, the response field where voters indicate their votes must not be located to the left of some candidates' names, and to the right of others'.

Display instructions near to where they are needed. For instance, only general instructions should be grouped at the beginning of the ballot; those pertaining to specific situations should be presented where and when needed.

Touch Screen Ballots Considerations

Provide clear and unambiguous instructions for navigating the ballot. Include instructions for any ancillary input devices such as ‘sip-and-puff’, paddles, etc. Provide the voter with clear and unambiguous

instructions for completing the voting process and casting the ballot. Use color to distinguish the instructions from the ballot content. If your touch screen voting station does not allow the voter to return to the instruction page, you should print these instructions and post them on the voting station in addition to providing the instructions on the touch screen.

If possible, keep all of the candidates for a given race in a single column on a single page. Avoid mixing races with a large number of candidates and races with a small number of candidates on a single screen. Whenever practical, limit each screen to a single race.

RECOMMENDATION Do not use over three columns on a touch screen.

If your voting system produces a Voter Verifiable Paper Audit Trail (VVPAT) maintain a chain of custody for the VVPATs. The handling of this chain of custody has the potential to become the object of severe criticism from candidates and activists. Impress on your poll workers the importance of adhering to and documenting the VVPAT chain of custody.

Optical Scan Ballots Considerations

General considerations for optical scan ballots: If possible, use a printer that has been certified by your voting system vendor. If this is not possible, be sure that the printer is able to meet your voting vendor's specifications. If you use multiple printers verify the consistency of the ballots among the printers. Require the printer(s) to send a 'test deck' of ballots to use to conduct logic and accuracy testing prior to all ballots being printed. If you hand mark your test deck you can use the printer supplied test deck to check the accuracy of your hand marked deck.

Have the ballots shrink wrapped in quantities small enough for you to verify the number of ballots in a pack (100 or less is recommended). If possible, review the ballots in all packets. Do not assume that because one (or several) packet of ballots is correct that all the other packets will also be correct.

If you prefer to send the ballots to the precincts in the original packaging, then review at least one packet of each ballot style.

When reviewing the ballots check for:

- ★ Text relative to fold,
- ★ Timing mark positions,
- ★ Bleed through,
- ★ Poor print quality,
- ★ Ink density,
- ★ Smudging,
- ★ Paper opaqueness, and
- ★ Verify that the folds do not interfere with the timing mark positions or the voting locations (ovals, arrows, etc.).

If the ballot is double sided, print clear instructions to the voter, on both sides of the ballot, to turn the ballot over. Print the words "VOTE BOTH SIDES" or a similar instruction at the bottom of both sides of the ballot.

If you use ballot-on-demand, it is advisable to test scan the ballot prior to issuing it to the voter. This is to insure that the paper was correctly aligned in the printer and that the scanner will recognize the timing marks. If scanning each ballot causes unacceptable delays, then, as a minimum, each time you change the paper or add paper to the printer scan the first few ballots to be sure the paper is correctly aligned.

IMPORTANT Maintain and document a chain of custody for all blank ballots. Some election officials tell their staff to pretend that the ballots are five dollar bills and treat them accordingly.

Audio Ballot Considerations

General Considerations for audio ballots: Do not begin to build your audio ballots until you have completed and verified your touch screen ballot.

For audio ballots it is important that each section of the ballot be in the same voice. For example, one voice can present the title and another voice can present the instructions. *However, all candidate names on the ballot must be in the same voice.* As stated in Guidelines section 3.2.4-D (see above), it is important for the volume and speed to be the same for all choices on the ballot. A recording of the candidates saying their names can be useful as a guide to pronouncing the name; however, this recording should not be used on the ballot. Some voting systems have

a provision for using synthesized voices. Select between natural voices and synthesized voices based on the preference of your disabled and/or language community. Partner with disability and language minority groups to assess which audio voice would best suit the needs of your voters; for example, contact the American Association of People with Disabilities (<http://www.aapd-dc.org/index.php>) for information regarding local organizations in your area that serve voters with disabilities. If you use natural voices, consider using trained voices, such as actors, radio announcers, pastors, etc. or members of the target community. The latter is very important to consider in particular when providing audio ballots in other languages than English.

RECOMMENDATION Use natural voices to the extent possible.

If you have to prepare the audio ballots in one or more languages other than English, make every effort to use persons for whom the language(s) are their first language. If possible, make the audio dialect neutral; however, if a language has more than one dialect, determine which dialect is used by a majority of your voters.

Translations from English to another language should maintain the spirit of the original text, particularly where literal translations are unavoidable or would not make sense.

Verifying the Ballot

Every ballot style must be reviewed and verified against the official ballot certification documents for correctness in every format (touch screen, optical scan, and audio) and every language. This should be done before the ballots are sent to the printers for printing.

Verifying a ballot style requires that the ballot style is loaded onto a touch screen voting station and a copy of the optical scan ballot style is available for comparison. You can use the photo-ready copies of the ballot styles for this verification.

The persons who review and verify the ballots should not be the same persons that built the ballots.

REMINDER ★ ★ ★

Remember the two person rule when verifying ballots.

One person should read the information from the official ballot certification document and the second person should verify that the information is identical on the touch screen, the optical scan ballot and the audio ballot. When testing the audio ballot, it is recommended that the ballot be played on a speaker so that both reviewers can hear and check the audio.

If possible, have a visually impaired person review the audio ballot. Also, if possible, have native language speakers review the alternate language audio ballots.

PRE-ELECTION AND PARALLEL TESTING

Introduction

Pre-election testing, also called Logic and Accuracy testing (L&A testing), is the act of testing *every* ballot style and *every* component of the voting system prior to the election. If you represent a large jurisdiction with thousands of voting stations and dozens of ballot styles, this will appear to be a daunting task. It is. However, documenting pre-election testing is a critical component of the election's audit trail, which ensures the election was administered in a fair, accurate, and transparent manner.

Parallel testing is the act of duplicating, as nearly as possible, a portion of the election under conditions that are identical to the conditions that occur in a polling place. Parallel testing came about in response to the contention that it is impossible to detect with 100 % certainty the presence of so called Trojan Horses that may be present in the voting system.

The contention is that these Trojan Horses would contain malicious code that would only become active after the polls are opened and would disappear immediately after the polls are closed. This being the case, their malicious activity would be impossible to detect. Thus, the idea behind parallel testing is that we can fool these Trojan Horses into thinking that the polls are open and then detect their malicious activity with a carefully controlled test.

Pre-Election/Logic and Accuracy Tests

Pre-test planning: Pre-election testing involves setting up the voting system for *each* of your precincts and early voting locations, loading the election definition, opening the election, casting a known pattern of votes on each ballot style, closing the election, printing the vote totals for the precinct, and then comparing the printed vote totals with the known

pattern of votes. In short, you are going to set up and test your entire election.

Planning for the pre-election testing should begin several weeks before the actual tests begin. This planning should include identifying the space required to house the tests, the staff required to conduct the tests, and the time required for the tests. If you represent a large jurisdiction, time requirements may dictate that tests for several voting locations must be conducted simultaneously.

Staff restrictions may require that you use contractors to assist you with the pre-election testing. If at all possible, a member of the election staff should be in charge of each contractor test team. One staff person can supervise two or three test teams provided the tests are conducted in the same location. Under no circumstances should a test team be composed entirely of contractor personnel. Each team should consist of at least two individuals. The EAC recommends that representatives from voting system manufacturers *do not* assist jurisdictions with pre-election testing.

As part of your pre-test planning prepare the test scripts that are to be voted on each ballot style. Be sure that each test script includes at least one vote for each candidate on the ballot and one 'yes' and one 'no' vote for each issue or question on the ballot. Be sure to include audio ballots in your test scripts.

Any testing that requires printed ballots (i.e. optical scan ballots) cannot actually begin until these ballots are available. This can be as little as 45 days prior to the election. However, if early voting locations and election-day precincts only use electronic voting stations and do not require paper ballots this testing can be scheduled to begin as soon as the election definition is completed.

As part of the pre-planning activities review your jurisdiction's requirements as they relate to

open access to the pre-election tests. Many State election codes require that these tests must be open to the public and advertised in your official record (newspaper) a specified number of days before the tests begin.

RECOMMENDATION If your State or local laws and regulations allow make the pre-election testing a media event.

About a week before the pre-election tests are to begin invite the media to a briefing. At this briefing provide them with the dates and times of the tests. Show diagrams of the test locations and point out where the media personnel can be during the tests. Provide written copies of any rules and procedures that apply to media personnel attendance and/or participation in the tests.

RECOMMENDATION At the test locations separate the test area from the public and media area with a physical barrier; for example, a low wall or a rope. Ensure this barrier is located so that the public and media can observe the test but cannot touch the testers or any of the test materials.

Pre-election testing: Before beginning a test, be sure that all required supplies are on hand, including the test deck of optical scan ballots. Although your ballot printer can provide you with a 'Logic and Accuracy Test Deck', the *Voluntary Voting System Guidelines* recommend that the optical scan test deck consist of hand-marked ballots. For a very large election hand marking a test deck may not be feasible.

RECOMMENDATION Include a fully voted ballot (every voting location marked), a blank ballot, and a ballot from a previous election in the test deck.

Conduct the pre-election test from beginning to end on one precinct/voting location at a time. Set up all of the equipment for the precinct/voting location and load the election setup on each device. Open the election and cast the test scripts for each ballot style. If DRE voting stations are used in the precinct/voting location, manually enter the test script for every ballot style on every voting station. If it is not feasible to vote every ballot on every voting station, the minimum recommendation is to vote every ballot style on at least one voting station and then visually inspect every ballot style on each of the other voting stations.

If audio ballots are used on either DRE voting stations or ballot marking voting stations such as the AutoMark device, enter the test script for *every* ballot style on every voting station. Again, if it is not feasible to vote every ballot on every voting station, the minimum recommendation is to vote every ballot style on at least one voting station and then visually inspect every ballot style on the screen of each of the other voting stations.

If optical scan ballots are used in the precinct/voting location, run the test deck for every ballot style used in the precinct/voting location.

If central count optical scan is used, run the test deck for every ballot style used in the election through each central scanner that will be used in the election.

When all testing has been completed, zero out all vote totals and close and seal all devices with a tamper proof seal. Record the seal numbers on a transmittal sheet that will be used in the polling place to verify that the devices have not been tampered with during transit.

Repeat the above pre-election test for every precinct/voting location.

REMEMBER ★ ★ ★

Test the absentee precincts!

tip

When time is of the essence, you can begin pre-election tests for voting locations that use only DRE voting stations prior to receiving the optical scan ballots from the printer.

When the tests in all of the precincts/voting locations have been completed and uploaded to the election management system, close the election and print the overall jurisdiction reports. Compare the vote totals on the jurisdiction reports with the known results from the test scripts.

Parallel Testing

Parallel testing is the act of duplicating, as nearly as possible, a portion of the election under conditions that are identical to the time and conditions that occur in a polling place. The rationale for parallel testing is that malicious code may have been introduced into the voting system software at some point,

and is lying dormant until the voting station is setup for an election. Parallel testing is an attempt to deceive this code into becoming active by simulating the exact conditions of an election.

NOTE Parallel testing is not recommended for optical scan systems. In this case, the paper ballots can be used to resolve any challenge to the election.

Successful parallel testing must take place during the hours of the election, using software and hardware that was prepared to be used in the election.

The mechanics of conducting a parallel test are as follows:

- ★ Conduct all of your pre-election testing in the normal manner,
- ★ Determine how many precincts and voting stations you are going to include in the parallel test,
- ★ Randomly select precincts/voting locations to be included in the parallel test,
- ★ Randomly select voting stations that have been prepared and sealed for use in the selected precincts/voting locations,
- ★ During the hours that the precinct/voting location is open, cast a known script on the selected voting stations,
- ★ Compare the resulting vote totals with the vote totals for the known script.

When selecting voting locations to be included in your parallel test, stratify your sample so that the number of large, medium, and small voting locations to be used in your test are in the same proportions as the number of large, medium, and small voting locations in your jurisdiction. Also, prepare voting scripts that reflect the demographics of the voting locations used in the test. This includes the number of ballots usually cast on a single voting station at that location and the distribution of those ballots by political party affiliation and language choice.

NOTE Audio is a language choice.

If possible select voting stations to be used in the parallel test that were prepared and sealed to be used in the voting location. If this will cause a shortage of voting stations in the precinct or voting location,

use voting stations from your inventory—preferably voting stations that have been prepared and sealed for the election as ‘back up’ or ‘spare machines.’

IMPORTANT On Election Day, conduct the parallel test in ‘Official Election Mode’ and cast the test voting scripts during the times that the voting location is open for voting.

Observe the “two person rule” when casting votes on a DRE voting station; have one person enter the votes while the other person calls out the votes and verifies the votes on the screen.

suggestion

Make a video record of all voting. This record can be used in the event of a discrepancy in the results to determine whether or not a data entry error caused the discrepancy.

If optical scan ballots or VVPATs are used, manually count the optical scan ballots or the VVPATs and compare the results with both the electronic vote totals and the known results of the voting script.

IMPORTANT Be aware that the ballots used for the parallel test are identical to the ballots used in the actual election. *Use extreme care to keep the test ballots separated from the actual ballots so that the test ballots do not become included in the official election results.*

Unless the parallel test is conducted rigorously, the results are not conclusive. That is to say, that without extreme rigor the malicious code may be clever enough to detect that you are running a test and remain dormant.

Post-Election Testing

Post-election testing consists of repeating a portion or all of the Pre-Election (Logic and Accuracy) tests. Many election officials feel that post-election Logic and Accuracy tests can be as effective at detecting an election anomaly as parallel tests, unless the parallel test is rigorous: uses voting stations prepared for the voting location, uses a significant number of voting locations and voting stations, and has a video record for backup. Post-election tests should be routinely

conducted a percentage of your precincts and particularly on any precinct that experienced an event that casts suspicion on the results.

RECOMMENDATION Even if you do parallel testing, it is recommended that you conduct post election Logic and Accuracy tests on at least 10 % of your precincts.

Conclusion

Parallel testing and post-election testing will only detect problems in an election *after* they occur. At this point, as the saying goes, “The horse is already out of the barn.” Certainly, if a problem occurs during an election you want to detect it so that you can take remedial action.

The best way to detect a potential problem *before* it occurs is with comprehensive, extensive pre-election (Logic and Accuracy) testing.



CHAPTER 7

ABSENTEE VOTING AND VOTE BY MAIL

Introduction

Ballots are cast by mail in every State, however, the management of absentee voting and vote by mail varies throughout the nation, based on State law. There are many similarities between the two since both involve transmitting paper ballots to voters and receiving voted ballots at a central election office by a specified date. Many of the internal procedures for preparation and mailing of ballots, ballot reception, ballot tabulation and security are similar when applied to all ballots cast by mail.

The differences relate to State laws, rules and regulations that control which voters can request a ballot by mail and specific procedures that must be followed to request a ballot by mail. Rules for when ballot requests must be received, when ballots are mailed to voters, and when voted ballots must be returned to the election official—all defer according to State law.

Listed below are the various types of voting by mail:

- ★ Permanent absentee—usually, but not always, reserved for the elderly and/or those voters with disabilities. These voters automatically receive a ballot in the mail for every election. Some State laws provide for periodic review of the “permanent” status, specifically if the voter does not cast a ballot after several elections.
- ★ Absentee (Voter must provide a reason or excuse)—requires voters to certify that they meet certain criteria, i.e. absent from the jurisdiction on Election Day, temporarily ill or disabled, etc. Some States require that the application to request a ballot must be notarized.
- ★ Early Voting/Absentee (Voter does not have to provide a reason or excuse)—based on State law, voters may submit a request to vote by mail. In

some States the request is valid for one or more years. In other States, an application must be completed and submitted for each election.

- ★ Vote by Mail—all votes are cast by mail. Currently, Oregon is the only vote by mail State; however, several States allow all-mail ballot voting options for ballot initiatives.

Ballot Preparation and Mailing

One of the first steps in preparing to issue ballots by mail is to determine personnel and facility and supply needs.

Facility Needs:

Adequate secure space for packaging the outgoing ballot envelopes should be reviewed prior to every election, based on the expected quantity of ballots to be processed. Depending upon the number of ballot styles and quantity of ballots, adequate shelving and a security-controlled storage area must be in place.

NOTE If inserting is performed at a mailing service, extra space may not be as critical.

Space will be required for sorting undeliverable ballots, since they should be reviewed immediately. Space will also be required for processing returned voted ballots:

- ★ Signature Verification
- ★ Challenged Ballots
- ★ Envelopes
- ★ Separating Ballots from Envelopes
- ★ Duplication, if required

Staffing Needs:

If ballot insertion is done in-house, part-time and/or regular employees, working in teams of two, are

assigned and managed in a staged work flow area. Various teams should be set up to help control the flow of materials and expedite the overall procedures:

- ★ Control Team
- ★ Labeling Team
- ★ Packet Assembly Team
- ★ Support Team
- ★ Sort Team

NOTE If outgoing mail ballot preparations are to be done off-site at a mailing house service, election office staff supervision is recommended.

If the election returned ballot processing is done in-house, review State law and regulations to determine if a sworn election worker board must be in place, or whether supervisors can be regular staff, whose only duty is to oversee the process. It is important to plan for peak periods which will require either more personnel, staggered shifts, or overtime.

Equipment and Supplies:

Equipment and supply needs must also be evaluated as it relates to space needs. These may include:

- ★ Ability to run data exports/labels for mailing companies
- ★ Software that provides CASS certification (postal barcode)
- ★ Insertion, folding and sealing machines
- ★ Printers
- ★ Postage meter and envelope sealer machine
- ★ Automatic letter openers
- ★ Computers and bar code devices
- ★ Storage shelves
- ★ Mail trays
- ★ File storage boxes
- ★ Tamper-evident tape

Ballot Preparation and Printing

The first step in preparation for printing and distribution of ballots is to develop a timeline detailing each step in the process. Examples of dates to be included on a timeline are:

- ★ Filing deadline

- ★ Close of registration
- ★ Deadline for public review of ballot design and content
- ★ Developing the ballot order and finalizing contract negotiation with the ballot printer
- ★ Date that ballot file is due at the printer
- ★ Delivery date for printed ballots
- ★ Logic and accuracy testing
- ★ Deadline for mailing of military and overseas ballots
- ★ Date for initial mailing of absentee ballots
- ★ Last date that absentee ballots can be mailed
- ★ Last day for receipt of voted absentee ballots

Once the timeline has been developed, staff assignments and deadlines can be incorporated.

Determining the number of ballots to order is often stipulated by State law or State administrative policies and procedures. If not, the ballot order can be developed by use of a spreadsheet containing the number of voters in each precinct multiplied by the percentage of ballots expected to be requested and/or reviewing the prior election turn-out by precinct.

NOTE It is important to increase the ballot order to provide for extra ballots needed to develop necessary logic and accuracy testing and to provide for provisional, spoiled and/or replacement ballots.

Before meeting with your ballot printer, make decisions regarding the following:

- ★ Quantities and different variations (ballot styles).
- ★ Consider possible weight limitations (printing instructions back-to-back will reduce the amount of paper and overall weight of the mail).
- ★ Consider different colors for different ballot types or districts.
- ★ Review any specific State requirements for ballots, i.e. numbered, detachable stub on each ballot.
- ★ Include required statutory information per ballot type.
- ★ For Primary Elections, remember to analyze the number of non-affiliated voters (consider buffering ballot quantities to accommodate for party changes or parties opening their Primary).

Prior to every election, election officials should also contact the local post office to review all policies and procedures relating to mailing, tracking and receiving the ballots. If you plan to use an outside mail service, you should also include a review of election office internal policies and procedures and contract requirements with the mail service vendor. Listed below are possible items to review and consider:

- ★ Identify timelines and scheduling (may want to allow for possible delays).
- ★ Identify staffing needs at all stages of the process (on-site supervision may be required).
- ★ Identify staging requirements (work areas for barcoding, tray assembly, zipping/sorting, etc.).
- ★ Consider quality control and security issues. Indicate how ballot transportation security needs are to be met (i.e. from office or vendor to mailing house or from mailing house to Post Office).
- ★ Specify various quality control issues (tracking and audit trails).
- ★ Establish method for addressing/labeling envelopes.
- ★ For inserts that may be needed, check with vendor on insert capability. Examples include:
 - Secrecy envelopes
 - Return envelopes
 - Ballot (one or more)
 - Local Voters' Pamphlet, if applicable
 - Drop site information, if applicable

Remember to review outgoing and return ballot envelopes before placing new orders. New technology and postal policies/procedures can improve the management of packaging outgoing envelopes and receiving voted ballots.

The Post Office can review or help you design outgoing and return envelopes to ensure they meet the necessary postal standards for automated handling. This includes review and assistance with the proper wording and placement of endorsements on your envelopes as they apply to the Post Office. They will also provide a camera-ready copy of the front side of both outgoing and return envelopes for the printer. This will include, for the return envelope, the 11-digit barcode for your return address.

Other examples include:

- ★ Eliminate the use of labels by printing voter names directly onto the outgoing ballot envelope.

NOTE Print these envelopes in ballot order instead of alphabetically to improve accuracy and efficiency when pulling and inserting ballots into outgoing envelopes.

- ★ Implement bar code technology for easy updating of voter history when return ballot envelopes are received in the mail.
- ★ Utilize the official election postal indicia on all outgoing and return ballot envelopes. Remember to review any envelope design changes with your local postal authority. It is recommended that you request their written approval on any changes.
- ★ Discuss options for the return mailing address for voted ballots with your local post office. Options include:
 - Your office address and zip plus 4
 - Post Office assigns a special "plus 4" for the elections office only
 - Establish a specific Post Office box for returned ballot envelopes.

Ballot Mailing

IMPORTANT As soon as printed ballots are delivered, conduct routine logic and accuracy testing on all ballot styles. This logic and accuracy test **MUST** be completed prior to mailing or issuing any ballots to voters.

It is important to track the number of envelopes printed each day and balance that number to the number of voter records flagged in the voter file that were issued mail ballots on each day. Print a master listing of voter names issued absentee ballots as a part of your audit trail for each election. Each day that envelopes are printed, a master listing of voter names should also be printed and balanced to the number of envelopes printed, inserted, and delivered to the post office every day. This audit trail will also provide the necessary tool for your use in tracking and verifying your printed ballot inventory.

Coordinate delivery of the outgoing ballots with your local post office. They will schedule a time frame that allows for the immediate distribution of ballots.

NOTE Larger post offices sometimes require delivery to a specific dock area. If delivery is by truck, the Post Office may require the truck to be weighed before the mailing is loaded and again before off-loading the ballots.

tip

Take the return ballot envelope package (containing the return ballot and all envelopes) to the post office to confirm the return postage amount. Include this information as an insert message to the voter.

Ballot Reception

The most common delivery method of absentee ballots is by mail. Other methods include drop site locations, often including a location at your local election office. The local election office may wish to consider coordinating a time with the Post Office to pick up the mail each morning. Even if the return address is the election office, you can arrange with the Post Office to pick up the voted/returned ballots each day. This will allow for earlier ballot processing. If ballots are returned to a P.O. Box number, the election office should consider establishing a written procedure for collecting these ballot envelopes.

NOTE Remember to coordinate with the Post Office for the latest pick-up time for last minute returns on Election Night.

If you plan to use drop site locations, be sure to refer to State Law and State administrative policies and procedures. You will want to determine drop site locations based on population, geographic areas, security and available funding. Consider using city and/or county facilities, public assistance offices, senior and community centers, secure locations in areas with significant minority or traditionally disenfranchised communities as drop off locations when applicable.

When determining locations, be sure to consider where the ballot box will be placed. Items to consider include:

- ★ security
- ★ voter convenience
- ★ access for the physically disabled
- ★ parking

Remember that the ballot boxes must be locked and secure at all times. They should be located in an area that can be viewed and monitored by authorized personnel.

If you plan to use outdoor mailboxes for drive-by or walking traffic, the ballot drop site mailboxes

should be accessible only by a key that is in the possession of two authorized election staff members. A predetermined collection schedule should be established. A team of two election staff should transfer the voted ballots to a locked or sealed ballot box, bag or pouch and deliver same to the election office.

Be sure to communicate the location and hours of operation for all drop sites in your jurisdiction. On Election Day, the drop site locations must be monitored throughout the day until the close of the polls or deadline for ballot receipt.

If State law allows the voter to drop off voted absentee ballots at early voting locations and/or the polling places on Election Day, be sure to include instructions and procedures for poll workers to use in returning these voted ballot envelopes to the central election office.

There must be an audit trail throughout the ballot reception process. Consider maintaining logs for processing the ballots through different steps. Maintain all statistical information for each precinct.

This may include:

- ★ number of ballots issued
- ★ number of ballots received
- ★ number of ballots counted
- ★ name, team number or person
- ★ date and time processed
- ★ number of challenged ballots
- ★ number of write-ins and duplicated ballots
- ★ number of envelopes that do not contain a ballot
- ★ number of envelopes containing more than one ballot
- ★ number of provisional ballots counted and not counted

The audit trail begins when the first ballot envelopes are returned from voters. On a daily basis, staff at the elections office counts and logs the number of:

- ★ ballots returned by the Post Office
- ★ ballots received over the counter
- ★ ballots received from drop sites, if applicable
- ★ ballots forwarded to other counties
- ★ ballots returned undeliverable

Initial Envelope Sort:

The ballot envelopes are then sorted into categories. Examples include:

- ★ Signature and address match
- ★ Challenged Ballots
 - No signature on ballot envelope
 - Address or name does not match voter record
 - Ballot has markings that could identify the voter
 - Signature does not match signature on file

Based on State law, jurisdictions establish internal procedures for managing returned ballot envelopes with no signatures. These options may include automatically re-mailing (if time permits) the unsigned and unopened envelope back to the voter in a separate outgoing envelope. Often the election staff is required to notify the voter that the ballot cannot be processed unless the envelope is signed by the close of polls on Election Day. The voter can be provided several options, including:

- ★ Request a replacement ballot be mailed (if time permits)
- ★ Sign the return identification ballot envelope at the elections office
- ★ Request that the original unsigned envelope be re-mailed to the voter for a signature (if time permits)

If signature verification is required by State law, it is important to provide your staff with signature verification training; training should include a section on how physical and cognitive impairments may cause signatures to not match. Implement a three-step process for reviewing all rejected signatures—first check

is done by part time and/or regular staff; second check is done by more experienced staff; and the third check is conducted by the canvass board. Consider utilizing the following criteria as an example when comparing to the signature on file:

- ★ Capital letters match
- ★ Letters tail off alike
- ★ Letter spacing is the same
- ★ Space between signature and the line is the same
- ★ Beginning and ending of signature and the slant are consistent
- ★ Unique letters match
- ★ Overall appearances match

NOTE If it is determined that the signature does not match the voter registration card or digitized signature, notify the voter and take other action that is required by your State law, policy and/or regulations.

NOTE Review State law and/or regulations regarding signatures of voters who are, physically or otherwise, unable to sign their name.

Data Entry of Returned Ballot Envelopes:

For all ballots that fall into the category of “signature and address match”, the envelope is recorded as “returned” and data entry is completed. The number of envelopes in this category is recorded on a data entry log on a daily basis. This number should balance to the number of envelopes stored and flagged as “ready to open and process” (see Sample Form 7.1).

SAMPLE FORM 7.1: RETURNED BALLOT ENVELOPES DATA ENTRY LOG

Ballots Returned—Summary of Data Entry

Election _____

Date	# Data Entered	Accumulative Total Entered

For purposes of balancing ballots received to ballots counted, you may want to bundle these envelopes into batches, number the batches for auditing purposes, and label the bundles (see sample data entry log strip below).

Data Entry Log Strip	
Date Entered _____	Batch Number _____
Total Number Entered _____	
Staff Initials _____	

Replacement Ballots (if permitted by State law)

A replacement ballot is issued when a voter requests by phone, in writing or in person a second ballot because the original ballot was destroyed, spoiled, lost or not received. If required, the voter must complete and sign a replacement ballot request form. Once a request for a replacement ballot has been received, the election official must:

- ★ Verify that the voter has not voted another ballot
- ★ Record that the voter has been issued a replacement ballot
- ★ Issue the replacement ballot by mail or other means

Ballot Processing

Based on State law and/or local policies and procedures, ballot envelopes are authorized to be opened. This process is done in several stages and is managed by separate teams of staff.

- ★ The first stage is opening the ballot envelopes and verifying that the batch contains the number of envelopes as noted on the data entry log strip. If the envelopes have been stored in batches, the opening team must keep the envelopes within their batches through the opening process.

NOTE It is recommended that envelopes opened each day be processed completely and securely stored at the end of the day.

- ★ The second stage is separating the ballot from the envelope. During this stage the ballots are pulled

from envelopes and the envelopes are immediately placed into storage containers.

IMPORTANT REMINDER ★ ★ ★

Before storing ballot envelopes, recheck that all envelopes are empty.

- ★ The third stage is the review stage (depending upon State law). During the review stage, ballots are analyzed for possible duplication, i.e. damaged ballots, identifying marks, etc.
- ★ The last stage is tabulation. The ballots move to the scanners, remaining in their original batches—and the total number of ballots scanned is validated at the time of tabulation. All scanned ballots are stored in batched in secured and/or tamper-evident sealed containers.

Ballot Review Process

Ballot review teams determine whether ballots should be counted, rejected or duplicated. The object of ballot review is to ensure that all ballots are machine-readable and that the voter's actual vote will be recorded accurately. If the ballot has damage or defects that would cause problems in tallying, the ballot may be duplicated, if provided by State law.

Based on State law, determine whether your jurisdiction is responsible for determining voter intent and at what stage of the process this is to be done (before tabulation or after attempted tabulation). If so, establish teams of two board members of differing political party affiliation to work together to determine voter intent.

The ballot review teams should also be trained to check for questionable marks and write-in votes at the same inspection.

Questionable marks are:

- ★ marks that cannot be read by the ballot counting equipment
- ★ a checkmark or an “X” in the voting area
- ★ voting area completed too lightly
- ★ voter’s choice not marked in the voting area, such as a write-in with an unmarked arrow or circle
- ★ marks that could identify the voter
- ★ marks indicating the voter’s change of mind and/or
- ★ comments marked in the voting area

Determining Voter Intent

If the inspection board agrees on the voter’s intent, the ballot should be duplicated to reflect the voter’s intent and the duplicated ballot counted. If the inspection board does not agree on the voter’s intent, the ballot should be challenged and forwarded to the canvass board.

NOTE Jurisdictions should follow their State’s definition of what constitutes a vote and what will be counted as a vote (Section 301(a)(6) of the Help America Vote Act).

Examples of the ballot review are noted below for reference only:

- ★ The arrow or oval has been completed for one response and a dot or partially completed arrow or oval is marked for the other.

Yes



No



- ★ The arrow or oval has not been marked, but the response is circled.



- ★ The arrow or oval has not been marked but there is a connective line between the response and the arrow or oval to indicate the vote.



- ★ More than one arrow or oval has been completed, but a word or mark is used to indicate the correct vote.



- ★ A word has been used to indicate the vote instead of completing the arrow or the oval.



this one

Duplication boards, regardless of the vote tally system used, process ballots requiring duplication, making a duplicate ballot that is machine-readable and reflects the voter’s intent. Duplicating and proofing

SAMPLE FORM 7.2: DUPLICATE BALLOT LOG

Duplicate Ballot Log

Date _____

Election _____

Batch Number	Ballot Style and/or precinct	Assigned Duplicate Number	Reason (Be Specific) Ex: Torn—letter opener, from mail, etc. Check Mark—pencil, black ink, red ink, etc	Staff Initial	Board Initial	Date

one ballot in the envelope; (3) ballot from wrong election in the envelope, etc.

By developing and maintaining an audit trail from the time that ballot envelopes are returned from the post office, through the initial sort, into the opening/separating and review process, at tabulation the audit team can verify that all ballots returned are accounted for—and have been either challenged or tabulated.

A sample ballot log transfer sheet is below.

It is recommended that ballots being counted in a centralized location on scanners be handled in batches. Each batch should be validated to the cumulative counter on the scanner. A central scanner log should be maintained detailing the batch numbers and total number of ballots scanned per batch. If the scanner uses a memory card, the memory card should be appropriately labeled and identified on the scanner log sheet. Refer to Sample Form 7.4 for an example of a scanner log sheet.

NOTE The original ballot is retained and is uniquely numbered to be easily identified with its duplicated ballot.

Ballot Tabulation

When the review teams have verified ballots for scanning, it is recommended that a form be prepared for each batch of ballots to be counted (see Sample Form 7.3).

The form should include the originally assigned batch number and the number of ballots sent to the scanner, including any exceptions. Types of exceptions include: (1) no ballot in the envelope; (2) more than

SAMPLE FORM 7.3: BALLOT LOG TRANSFER SHEET

BALLOT LOG TRANSFER SHEET	
Election _____	
Opening and Ballot Removal Team Report _____	
<i>(Team Initials)</i>	
Batch Number _____	
Batch Date _____	
Total in Batch _____	
Exceptions _____	

Total Ballots Sent to Scanner _____	
Scanning Team Report _____	
<i>(Team Initials)</i>	
Number Received To Be Scanned _____	
Scanner # _____	
Memory Card Assigned _____	
Number Scanned (Count) _____	
Number of Overvotes _____	
Number of Blank Votes _____	
<p>Form is filed in master log book in batch number order and balanced to Return Mail Ballots by Batch Number Log assuring that all batches have been scanned.</p>	

SAMPLE FORM 7.4: SCANNER LOG SHEET

Scanner Log Sheet

Election _____

Scanner #	Batch #	Count #	Blanks	Overvotes

Managing Absentee Ballots at the Polls on Election Day

Depending upon State law, internal procedures must be established for managing the return of absentee ballots at the polls on Election Day. These procedures must be incorporated within your poll worker training guidelines.

To assist poll workers on Election Day, prepare a visual flow chart detailing the steps to follow, based on the specific voter scenario. On the next page is an example of a flow chart for this purpose based on a sample provided by an election jurisdiction.

Storage and Security

Storage:

All ballots and empty ballot envelopes should be boxed and sealed in tamper evident containers. Store all other records—ballot return logs, duplicate logs, scanner logs, etc. according to Federal and your

tip

Consider storing ballots by precinct for recount and/or auditing purposes.

State's retention rules.

All challenged and/or provisional ballots that are not eligible to be counted should be stored separately.

Security

Prepare a written security plan on the processing of absentee/vote by mail ballots. The plan should include the following details:

- ★ Security at the printing facility
- ★ Security for periods of ballot transportation (e.g. from print shop to location of insertion; from mailing house to Post Office and from Post Office to election office other than regular mail delivery)
- ★ Security for ballots during processing
- ★ Security for ballot drop sites
- ★ Guidelines for security involving observers
- ★ Document the security of your office work area, building and ballot storage (alarms, cameras, special keys, limited keys)
- ★ Document security for vote tally systems, computer access security and off-site storage for system backups.

At all times, ballots **must** be maintained in a secure location in accordance with your written security plan. Adequate supervision must be provided during all processing activities.

Establish and maintain a log of who has access (keys, electronic codes, etc.) to secure areas. To prevent unauthorized access, consider installing secondary locks accessible only to authorized Elections Officials

REMINDER ★ ★ ★

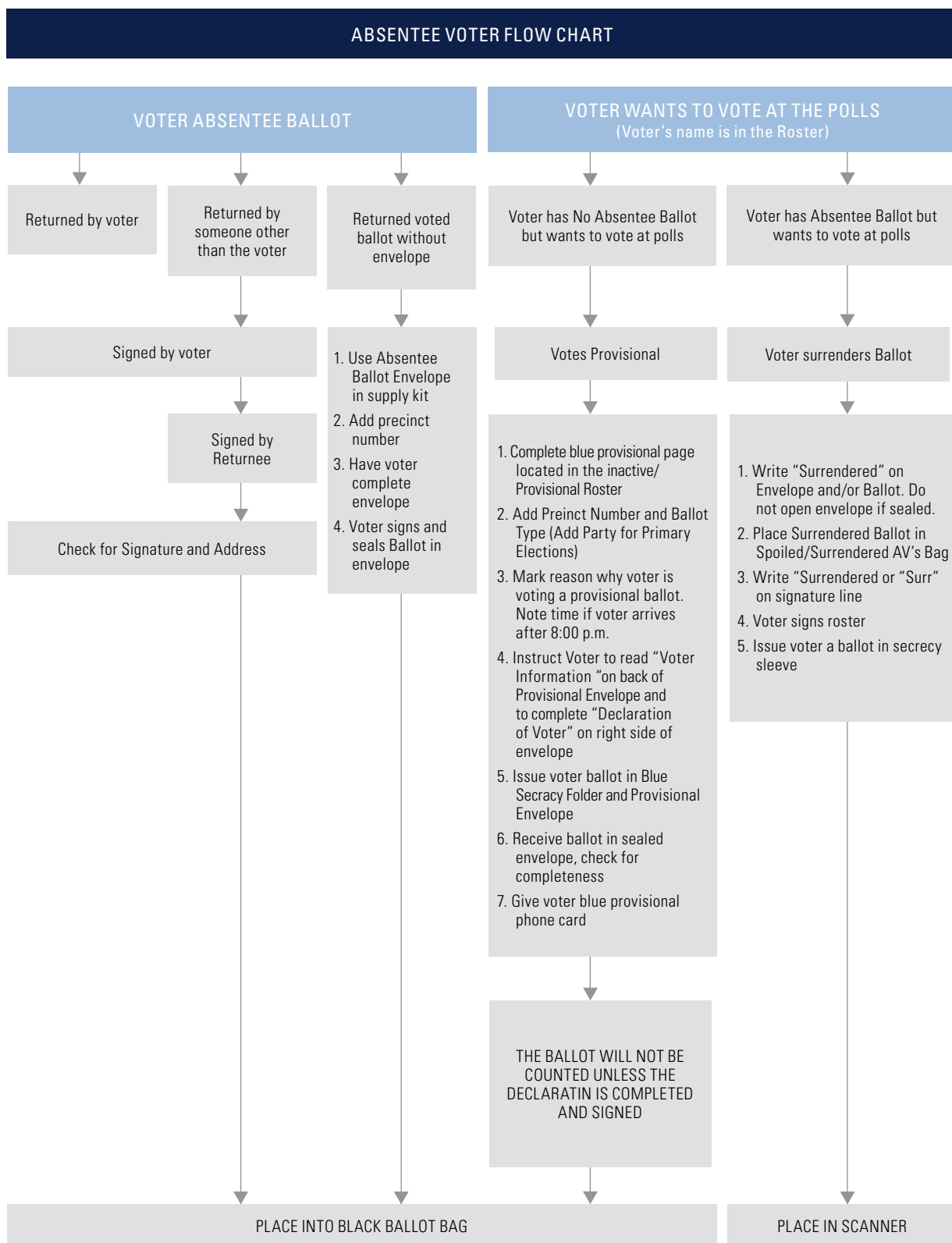
Use of motion detectors, video cameras, alarm systems and other technology may be appropriate supplements to locks.

on election-specific dates.

Voter Education

It is important that election officials take extra efforts to inform voters of the proper way to vote their ballot and all other procedures required for returning the ballot envelope to ensure that their vote is counted.

SAMPLE FORM 7.5: ABSENTEE VOTER FLOW CHART



Be sure to print clear concise instructions on the ballot with simple visual aids indicating how to fill in the oval or connect the lines to select their choices. The outside of the ballot envelope should contain a quick checklist and/or instructions to remind voters of common problems encountered, i.e. “Signature is required in order to count your ballot”, postage amount required, etc.

In order to ensure that all voters have access to information about voting absentee by mail, establish a variety of communication methods.

Listed below are examples:

- ★ Create an informational brochure with instructions on how to vote absentee by mail. If permitted, include a copy of the vote by mail ballot application form as a “tear off return mail page” on the brochure. Make these brochures available at area city hall, libraries, etc. Distribute them at “Get Out the Vote” speaking engagements, community events, registration drives, etc.

EXAMPLE Be sure to include information about all aspects of voting by mail, including how to request a replacement ballot, and how to qualify to become a “permanent” vote by mail voter, if permitted by State law.

- ★ Post information about absentee vote by mail procedures on your jurisdiction’s web site. Information on all deadlines should be posted along with dates that voters can expect the ballots to be mailed. If voted ballots must be received in your office by a certain date, be sure to include that date in **BOLD**. If possible, include a downloadable copy of the vote by mail ballot application form, if required.

tip

If permitted, consider including a link that allows voters to confirm their voter registration status and to request an early/absentee ballot from your web site. If their information needs to be updated, provide another link to a voter registration form, allowing the voter to manage their own updates at their convenience.

- ★ Provide this information to high schools, community colleges, and universities. Partner with these learning institutions to distribute voter registration and absentee voting instructions with enrollment packets. Encourage them to communicate Election Day deadlines for voter registration and absentee voting through the use of email, pod casting, and text messaging.
- ★ Encourage candidates to provide information to voters about how to vote absentee by mail.

tip

Provide a scripted handout to all candidates and encourage them to use it for all campaign literature to ensure consistency in all printed material.

- ★ Distribute absentee voting procedures brochure to special interest groups: nursing homes, assisted living centers, hospitals, military installations, etc.
- ★ Utilize brochures, flyers, and your jurisdiction’s web site to inform the voter about how to ensure that the ballot will be counted. Provide answers to “frequently asked questions” such as: “Can I drop my voted absentee ballot at the polls on Election Day?”; “Will my ballot be counted if I mail it on Election Day?”; “I made a mistake while voting my ballot. How do I get a new ballot?”
- ★ Provide your local and State media with any deadlines and requirements specific to absentee voting.
- ★ Provide all of this information in the appropriate alternate language(s) if your jurisdiction is covered for language assistance under the Voting Rights Act.
- ★ Materials should also be developed in formats accessible to voters with disabilities. For resources and information on how to develop brochures, flyers, websites, and other materials that are accessible visit the Access Board at <http://www.access-board.gov/> or contact them at 202.272.0080 (v) or at 202.272.0082 (TTY). You may also find the following resource useful: Accessibility of State and Local Government Websites to People with Disabilities: <http://www.ada.gov/websites2.htm>.



CHAPTER 8

UNIFORMED AND OVERSEAS CITIZENS

Introduction

The Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA) of 1986 [42 U.S.C. 1973ff-1], as modified by the National Defense Authorization Act of 2005, ensures the rights of absent Uniformed Services voters and overseas voters to register to vote and cast absentee ballots for Federal offices. The Secretary of Defense, as the Presidential designee has primary responsibility for Federal functions under UOCAVA. He is also authorized to delegate any or all of the functions, responsibilities, powers, authority, or discretion devolving upon him to any person or persons within the Department of Defense (DoD) [Executive Order 12642]. As such, DoD has assigned to the Federal Voting Assistance Program (FVAP) the responsibility of administering the Federal responsibilities of the Presidential designee (Secretary of Defense) under UOCAVA and the National Voter Registration Act (NVRA) of 1993 [42 U.S.C. 1973gg-7(a)]. FVAP provides services to over 6 million potential voters, including over 3 million overseas civilians; 1.4 million military members; 1.3 million military family members; and 100,000 Federal civilian overseas employees.

The Help America Vote Act of 2002 (HAVA) amended the UOCAVA by prohibiting States from refusing to process registration and/or absentee ballot requests from these voters because the form was received too early during the election year. UOCAVA, as amended, also allows these voters to use one application to request ballots for two subsequent general elections.

In addition, UOCAVA Section 102(c), as amended by the Help America Vote Act (HAVA) of 2002, requires each State and unit of local government which administered the election to, no later than 90 days after the date of each regularly scheduled general election for Federal office, submit a report to the EAC on the combined number of absentee ballots transmitted to absent Uniformed Services voters and overseas voters

for the election and the combined number of such ballots that were returned by such voters and cast in the election. They are also required to make this report available to the general public.

Definitions and Forms

Who is an absent Uniformed Services voter? An absent Uniformed Services voter is:

- ★ A member of the Army, Navy, Air Force, Marine Corps, Coast Guard, the commissioned corps of the Public Health Service, and the commissioned corps of the National Oceanic and Atmospheric Administration who, by reason of active duty, is absent from the place of residence where the member is otherwise qualified to vote.
- ★ A member of the Merchant Marine who, by reason of service in the Merchant Marine, is absent from the place of residence where the member is otherwise qualified to vote.
- ★ A member of any State National Guard or a Reserve member deployed or on assignment away from his/her residence while in Federal service.
- ★ A spouse or dependent of a uniformed services member who, by reason of the active duty or service of the member, is absent from the place of residence where the spouse or dependent is otherwise qualified to vote.

What is the legal State of residence for a Uniformed Services member? The State where the Uniformed Services member has, or has had, physical presence at the location and where there is the intent to remain or return.

Who is an overseas citizen? An overseas citizen is a person who resides outside the United States and is qualified to vote in the last place in which the person was domiciled before leaving the United States

or a person who resides outside the United States and, but for such residence, would be qualified to vote in the last place in which the person was domiciled before leaving the United States. Eligibility to vote and residency requirements are determined by each State.

What is the legal State of residence for an overseas citizen? The State or territory where the voter last resided immediately prior to departure from the United States, even if many years have elapsed, and the voter maintains no residence in the State or territory, and the voter's intent to return to that State or territory may not be certain.

NOTE Currently 16 States allow eligible U.S. citizens who have never resided in the United States to register and vote where a U.S. citizen parent would be eligible to vote.

Below are some questions that may be helpful in determining a voter's legal State of residence:

- ★ Where was the voter registered to vote?
- ★ What State issued the voter a driver's license?
- ★ Where is the voter's automobile registered?
- ★ Where does the voter's family live?
- ★ Where does the voter own property?

What ballots will UOCAVA voters receive?

UOCAVA requires States and territories to allow the covered groups listed above to register and vote absentee ballots in elections for Federal office. In addition, laws in many States and territories also allow citizens covered by UOCAVA to register and vote absentee ballots in State and local elections.

The Federal Post Card Application (FPCA) Standard Form 76. This is a postage-paid postcard for use by UOCAVA voters. The form is designed as a single postcard to serve the States both as an absentee voter registration application and an absentee ballot request.

An online version of this form is available at www.fvap.gov. Voters using the online FPCA must print the completed form, place it in an envelope and affix postage to the mailing envelope or use the postage-free envelope that may be printed using the link available at www.fvap.gov. The form can be filled in on-line, printed, signed, dated, and placed in an envelope with the correct postage and mailed to the appropriate local election official. Other instructions are available on the FVAP's web site.

See page 65 for a sample of the FPCA form.

The Federal Write-In Absentee Ballot (FWAB) Standard Form 186. This is an emergency "back-up" ballot available for citizens covered under the UOCAVA. It is used to vote for Federal offices in general elections or as otherwise permitted by State law.

The following criteria must be met:

- ★ The citizen must be a member of the Uniformed Services or Merchant Marines (or eligible family member), or a United States citizen overseas who is absent from his/her place of residence where he or she is otherwise qualified to vote, and
- ★ apply for a regular ballot, using the FPCA, or other form as permitted by the State, early enough so that the local election official receives the request at least 30 days before the election or before the ballot request deadline established by the State, whichever is later, and
- ★ not have received the requested regular absentee ballot from the State.

See page 66 for samples from a FWAB form.

Communication Techniques

Military and overseas voters face unique challenges in registering to vote, requesting and receiving the blank ballot, and returning the voted ballots. Communication is the key ingredient for ensuring that these voters are able to participate in the democratic process.

In 2005, the FPCA and the FWAB forms were updated to include an area for the voter to provide his or her email address. By collecting and storing these email addresses on each voter's record, you can quickly contact the voter to confirm his or her registration status, let the voter know when you are sending out the ballot, email a blank ballot to a voter, and ask the voter to acknowledge receipt of the absentee ballot. By establishing an email connection with your UOCAVA voters, the voter has a staff member and email address to get quick answers to his or her questions.

tip

Consider sending out periodic news "updates" to all of your UOCAVA voters by using this email connection.

Election officials can also find a postcard acknowledgment form on the FVAP's website (sample of the front and back of card is provided below. You can use this form to notify the voter that the FPCA has been received and accepted, or that more information is

required to process the form.

If for some reason your office receives returned undeliverable UOCAVA absentee ballots, it is recommended that you take every step possible to obtain the correct mailing address for the voter.

- ★ Utilize telephone, fax, or email contact information provided on the FPCA.

NOTE Faxes to voters are toll-free to any location in the world by using the FVAP's Election Transmission Service, 1.800.368.8683.

- ★ Double check the mailing address on the return envelope and compare it to the address provided by the voter on the absentee ballot request.
- ★ Contact a local family member of the voter.
- ★ Request an updated address through the FVAP's Department of Defense's database, by sending an email to vote@fvap.ncr.gov with the subject "Address Update" or by faxing to 703.696.1352. Be sure to include the name of the voter, date of birth, and if possible, the full social security number if available.

NOTE This service is only available for Uniformed Service Member voters.

For UOCAVA voters, often the Internet is their best source of information. It is available to them 24 hours a day, 7 days a week. If your office maintains a website, it is recommended that you create a special resource area devoted to these voters. Consider including the following types of information on your website:

- ★ Provide a link to the Federal Voting Assistance Program website—www.fvap.gov
- ★ Display information on State-specific rules and regulations for UOCAVA voters. Be sure to include a link to the FPCA online version—www.fvap.gov/pubs/onlinefpc.html
- ★ Post a direct email link and/or toll-free phone number to encourage UOCAVA voters to contact your office with any questions. Be sure that your staff is trained to monitor and respond promptly to any email inquiries. Tip: Consider creating and listing, on your website, a unique email address specific for UOCAVA voters so that emails coming in from these voters can be directed to specific staff trained

to respond to UOCAVA voter concerns.

- ★ Provide an online voter status search tool for UOCAVA voters, allowing them to verify their voter registration status. Include a link to the online FPCA form to assist them in registering to vote and requesting their absentee ballot.

NOTE The United States Postal Service has introduced a new tag that can be placed on outgoing trays, bundled mail, pallets, etc. to specifically identify and differentiate domestic and overseas absentee ballots from political mailings. Check the USPS web site for details at www.usps.com/electionmail

Because transmitting voting material through the mail may delay receipt and return, there are currently three alternative transmission methods allowed by various States:

- ★ Send the FPCA for registration and ballot request by fax or email as permitted by the State.
- ★ Receive the blank ballot by fax or email as permitted by the State.
- ★ Return the voted ballot by fax or email as permitted by the State.

NOTE Be sure that the voter always mails the original FPCA and voted ballot after faxing or emailing.

Resources for Local Election Officials

The *Voting Assistance Guide* is the official and primary source of UOCAVA absentee voting information. The *Guide* provides information about FVAP products and services and includes State instructions and guidelines. It is available on line at www.fvap.gov

The *Guide* helps local election officials understand the information provided to military and overseas voters.

The FVAP's ombudsman service is available toll-free at 1.800.438.VOTE (8683), by email at vote@fvap.ncr.gov, or by fax at 703.696.1352. This service is very useful for locating active duty military voters when the address that you have on file is no longer valid. It is also available to you for ordering additional FPCA forms or to answer basic questions about military and overseas voters.

The *Voting Information News (VIN)* is a monthly newsletter published by FVAP that contains timely information for Voting Assistance Officers. The *Election*

Official News is a monthly newsletter published by FVAP that contains information for election officials regarding military and overseas voting. All local and State election officials should subscribe to these newsletters by sending an email to vote@fvap.ncr.gov.

Local election officials should log onto the FVAP's "Resources for Election Officials" at www.fvap.gov/leo/leo.html. At this site you will have access to useful information on providing services to UOCAVA voters.

The following is contact information for the Department of Defense's Federal Voting Assistance Program:

Director, Federal Voting Assistance Program (FVAP)
Office of the Secretary of Defense
1155 Defense Pentagon
Washington, DC 20301-1155
1.800.438.8683 (Toll free)
703.588.1584
703.696.1352 (Fax)
www.fvap.gov
vote@fvap.ncr.gov

The next pages contain the following:

- ★ sample Federal Post Card Application (FPCA)
- ★ sample Federal Write-In Absentee Ballot (FWAB)
- ★ sample ballot transmission envelope
- ★ sample ballot return envelope (back and front)
- ★ sample local election official acknowledgement card
- ★ USPS Domestic Mail Manual 703: Nonprofit Standard Mail & Other Unique Eligibility - Absentee Balloting Materials
- ★ FVAP's Envelope Design Guidelines

EAC RESOURCES AVAILABLE AT WWW.EAC.GOV

- ★ EAC's Best Practices on Military and Overseas Voters (2004)
- ★ 2004 Uniformed and Overseas Citizens Voting Act Survey
- ★ 2006 Uniformed and Overseas Citizens Voting Act Survey
- ★ UOCAVA Voters and the Electronic Transmission of Voting Materials in Four States (2007)
- ★ Voting from Abroad: A Survey of UOCAVA Voters (2007)
- ★ Also visit the EAC's specific webpage for uniformed and overseas voters at <http://www.eac.gov/voter/overseas-citizens-and-military-voters> for additional organizations and resources that can be of assistance to election officials and voters.

WARNING: Knowingly presenting false information in this application could result in criminal sanctions.

Standard Form 186A (Rev. 10-2005)

VOTER'S DECLARATION/AFFIRMATION - FEDERAL WRITE-IN ABSENTEE BALLOT (FWAB)					
1.a. I AM (Mark only one): <input type="checkbox"/> A MEMBER OF THE UNIFORMED SERVICES OR MERCHANT MARINE ON ACTIVE DUTY, OR AN ELIGIBLE SPOUSE OR DEPENDENT <input type="checkbox"/> A U.S. CITIZEN RESIDING OUTSIDE THE U.S. TEMPORARILY <input type="checkbox"/> A U.S. CITIZEN RESIDING OUTSIDE THE U.S. INDEFINITELY					
1.b. I ALSO REQUEST VOTER REGISTRATION (where permitted by state law) <input type="checkbox"/>					
2. MY INFORMATION (Required)					
a. TYPED OR PRINTED NAME (Last, First, Middle)				SUFFIX (Jr., Sr., III, etc.)	b. PREVIOUS NAME (if applicable)
c. SEX <input type="checkbox"/> M <input type="checkbox"/> F	d. RACE	e. DATE OF BIRTH (MMDDYYYY)	f. SOCIAL SECURITY NUMBER — —	g. STATE DRIVER'S LICENSE OR I.D. NUMBER	
h. TELEPHONE NUMBER (No DSN number; include all international prefixes)			i. FAX NUMBER (No DSN number; include all international prefixes)		
j. EMAIL ADDRESS					
3. MY VOTING RESIDENCE ADDRESS (Required) (Military, use legal residence. Overseas citizens, use last legal residence in U.S.)					
a. NUMBER AND STREET (Cannot be a P.O. Box.)					
b. CITY, TOWN OR VILLAGE		c. COUNTY		d. STATE	e. ZIP CODE —
4. WHERE TO SEND MY VOTING MATERIALS					
a. MY CURRENT ADDRESS (Where I live now) (Required)			b. MY FORWARDING ADDRESS (NOTE: Complete 4b. only if you do not want your ballot mailed to the address in Block 4a.)		
<hr/> <hr/>			<hr/> <hr/>		
5. MY POLITICAL PARTY PREFERENCE (Optional, but may be required by states to register to vote in primary elections):					
6. ADDITIONAL INFORMATION (Designate the period for which you want to receive future ballots. See instructions. Consult your state pages of the Voting Assistance Guide for additional information requested.)					
7. AFFIRMATION: (Required) I swear or affirm, under penalty of perjury, that: <ol style="list-style-type: none"> 1. I am a member of the Uniformed Services or merchant marine on active duty or an eligible spouse or dependent of such a member, or a U.S. citizen temporarily residing outside the U.S., or other U.S. citizen residing outside the U.S., and 2. I am a U.S. citizen, at least 18 years of age (or will be by the day of the election), eligible to vote in the requested jurisdiction, and 3. I have not been convicted of a felony or other disqualifying offense or been adjudicated mentally incompetent, or if so, my voting rights have been reinstated, and 4. I am not registering, requesting a ballot, or voting in any other jurisdiction in the U.S., and 5. My application for a regular absentee ballot was mailed in time to be received by the local election official 30 days prior to this election, or the state deadline, whichever is later, and 6. I have not received the requested ballot, and 7. I understand that if my regular absentee ballot is received by the local election official in time to be counted, that ballot will be counted and this write-in ballot will be voided, and 8. I have voted and sealed this ballot in private and have not allowed any person to observe the marking of this ballot, except for those authorized to assist voters under state or Federal law and I have not been influenced, and 9. I am a Uniformed Services member, or dependent, who is absent from my voting jurisdiction, or I am an overseas citizen and have submitted this ballot from outside the U.S., or my state has made special provisions to allow me to mail this ballot inside the U.S., and 10. My signature and date below indicate when I completed this document, and 11. The information on this form is true and complete to the best of my knowledge. I understand that a material misstatement of fact in completion of this document may constitute grounds for conviction of perjury.					
Signed: _____		Date: _____ (MMDDYYYY)		Signed: _____ Witness/Notary and Address (if required) _____ (MMDDYYYY)	

The information contained herein is for official use only. Any unauthorized release of this information may be punishable by law.

U.S. SENATOR*

U.S. REPRESENTATIVE/DELEGATE**/RESIDENT COMMISSIONER**

**** Legal residents of American Samoa, Guam, Puerto Rico and the U.S. Virgin Islands may vote only for Delegate or Resident Commissioner to the Congress.**

ADDENDUM

Some states allow the Federal Write-In Absentee Ballot to be used by military and overseas civilian voters in elections other than general elections or for offices other than Federal offices. Consult your state section in the *Voting Assistance Guide* to determine your state's policy. *If you are eligible to use this ballot to vote for offices/candidates other than those listed above*, please indicate in the spaces provided below, the office for which you wish to vote (for example: Governor, Attorney General, Mayor, State Senator, etc.), and the name and/or party affiliation of the candidate for whom you wish to vote.

OFFICE

CANDIDATE NAME or PARTY AFFILIATION

Standard Form 186A (Rev. 10-2005)


(Use reverse side for additional space)


MAX		
Height	6 1/8 inches	
Length	11 1/2 inches	
MIN		
Height	3 1/2 inches	
Length	5 1/2 inches	
Use Black Ink		

BALLOT TRANSMISSION ENVELOPE

(SAMPLE)

Name and complete address





PAR AVION

OFFICIAL ABSENTEE BALLOTING MATERIAL - FIRST CLASS MAIL

NO POSTAGE NECESSARY IN THE U.S. MAIL-DMM 703.8.0

TO:

•

•

•


•

MAX		
Height	6 1/8 inches	
Length	11 1/2 inches	
MIN		
Height	3 1/2 inches	
Length	5 1/2 inches	
Use Black Ink		

BALLOT RETURN ENVELOPE

(Sample)

If mailed in non U.S. Postal System - Voter must pay postage

Name and complete address <hr/> <hr/> <hr/> <hr/> <hr/>		<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;"> U.S. Postage Paid 39 USC 3406 </div> <div style="text-align: center; margin-top: 20px;"> PAR AVION </div>
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OFFICIAL ABSENTEE BALLOTING MATERIAL - FIRST-CLASS MAIL

NO POSTAGE NECESSARY IN THE U.S. MAIL-DMM 703.8.0

**SECRETARY OF THE STATE OF MARYLAND
 MONTGOMERY COUNTY ELECTIONS BOARD
 MONTGOMERY COUNTY COURT HOUSE
 1234 MAIN STREET
 ANYWHERE, MD 00000-0000**

SAMPLE FORM 8.5: BALLOT RETURN ENVELOPE (BACK STANDARD OATH)

MAX
Height 6 1/8 inches
Length 11 1/2 inches

MIN
Height 3 1/2 inches
Length 5 1/2 inches
Use Black Ink

BALLOT RETURN ENVELOPE - BACK (Sample)

For States Requiring the Oath be Witness or Notarized

Standard Oath

I swear or affirm, under penalty of perjury, that I am:

1. A member of the Uniformed Services or merchant marine on active duty; or an eligible spouse or dependent of such a member; or,
A U.S. citizen temporarily residing outside the U.S.; or,
Other U.S. citizen residing outside the U.S.; and
2. I am a U.S. citizen, at least 18 years of age (or will be by the date of the election), and I am eligible to vote in the requested jurisdiction; and
3. I have not been convicted of a felony, or other disqualifying offense, or been adjudicated mentally incompetent, or, if so, my voting rights have been reinstated; and
4. I am not registering, requesting a ballot, or voting in any other jurisdiction in the U.S., except the jurisdiction cited in this voting form.

In voting, I have marked and sealed my ballot in private and have not allowed any person to observe the marking of the ballot, except for those authorized to assist voters under state or Federal law. I have not been influenced.

My signature and date below indicate when I completed this document.

The information on this form is true, accurate, and complete to the best of my knowledge. I understand that a material misstatement of fact in completion of this document may constitute grounds for conviction of perjury.

Signed: _____ Date: _____
Month/Day/Year

Witness(es) or Notary signature and date:

Signed: _____ Date: _____
Month/Day/Year

SAMPLE FORM 8.6: LOCAL ELECTION OFFICIAL ACKNOWLEDGEMENT CARD

YOUR FEDERAL POST CARD APPLICATION FOR VOTER REGISTRATION AND ABSENTEE BALLOT REQUEST HAS BEEN RECEIVED AND PROCESSED			YOUR FEDERAL POST CARD APPLICATION FOR VOTER REGISTRATION AND ABSENTEE BALLOT REQUEST HAS BEEN RECEIVED AND PROCESSED		
You will be sent an absentee ballot for Primary - General - Special - Run-off - Other election(s) approximately (date)			You will be sent an absentee ballot for Primary - General - Special - Run-off - Other election(s) approximately (date)		
Your application is incomplete or illegible.			Your application is incomplete or illegible.		
Block(s) is(are) incomplete or illegible.			Block(s) is(are) incomplete or illegible.		
Please provide:			Please provide:		
Please resubmit a completely new application.			Please resubmit a completely new application.		
Comments:			Comments:		
Email information to:			Email information to:		
Fax information to:			Fax information to:		
Mail information to return address on reverse side of this post card.			Mail information to return address on reverse side of this post card.		
Signature	Title/Jurisdiction	Date	Signature	Title/Jurisdiction	Date
Note to election official: This is a return post card for your use. Please mark and fill in applicable items. Write your return address and send to the citizen.			Note to election official: This is a return post card for your use. Please mark and fill in applicable items. Write your return address and send to the citizen.		
YOUR FEDERAL POST CARD APPLICATION FOR VOTER REGISTRATION AND ABSENTEE BALLOT REQUEST HAS BEEN RECEIVED AND PROCESSED			YOUR FEDERAL POST CARD APPLICATION FOR VOTER REGISTRATION AND ABSENTEE BALLOT REQUEST HAS BEEN RECEIVED AND PROCESSED		
You will be sent an absentee ballot for Primary - General - Special - Run-off - Other election(s) approximately (date)			You will be sent an absentee ballot for Primary - General - Special - Run-off - Other election(s) approximately (date)		
Your application is incomplete or illegible.			Your application is incomplete or illegible.		
Block(s) is(are) incomplete or illegible.			Block(s) is(are) incomplete or illegible.		
Please provide:			Please provide:		
Please resubmit a completely new application.			Please resubmit a completely new application.		
Comments:			Comments:		
Email information to:			Email information to:		
Fax information to:			Fax information to:		
Mail information to return address on reverse side of this post card.			Mail information to return address on reverse side of this post card.		
Signature	Title/Jurisdiction	Date	Signature	Title/Jurisdiction	Date
Note to election official: This is a return post card for your use. Please mark and fill in applicable items. Write your return address and send to the citizen.			Note to election official: This is a return post card for your use. Please mark and fill in applicable items. Write your return address and send to the citizen.		

Nonprofit Standard Mail and Other Unique Eligibility: Absentee Balloting Materials**8.0 Absentee Balloting Materials****8.1 Basic Standards****8.1.1 Definition**

Balloting materials, consisting of postcard applications, ballots, voting instructions, and envelopes, may be sent through the mail without prepayment of postage to enable persons in the following categories to apply for registration and vote by absentee ballot when absent from the place of voting residence and otherwise eligible to vote as an absentee:

- a. Members of the Armed Forces in active service and their spouses and dependents.
- b. Members of the U.S. Merchant Marine and their spouses and dependents.
- c. U.S. citizens residing outside the territorial limits of the United States and the District of Columbia and their spouses and dependents residing with or accompanying them.

8.1.2 Eligibility

To be mailable without prepayment of postage, the balloting materials must be deposited at a U.S. Post Office, an overseas U.S. military Post Office, or an American Embassy or American Consulate.

8.1.3 Between Officials

Balloting materials may be mailed between state and local election officials, individually or in bulk, without prepayment of postage. Packages of materials mailed in bulk must bear an address label as described in 8.2.

8.1.4 Elections Affected

Materials may be for any general election of electors for President and Vice President, or of senators and representatives in Congress, and other general, primary, and special elections.



8.2 Marking**8.2.1 Envelope**

The envelope used to send balloting material and the envelope supplied for return of the ballots must have printed across the face the words "Official Absentee Balloting Material—First-Class Mail" (or similar language required by state law) in a rectangular box. Immediately below, the words "No Postage Necessary in the U.S. Mail—DMM 703.8.0" must be printed. Envelopes previously approved with the citation "DMM E080" must not be rejected. In the upper right corner of the envelope, in a rectangular box, the words "U.S. Postage Paid, 39 USC 3406" must be printed. An appropriate inscription or blank spaces for the return address of the sender must be shown in the upper left corner (see Exhibit 8.2.1).

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Nonprofit Standard Mail and Other Unique Eligibility: Absentee Balloting Materials


Exhibit 8.2.1 Balloting Material Formats—Envelope

Name and Complete Address _____ _____ _____ _____		U.S. Postage Paid 39 USC 3406 PAR AVION
<div style="border: 1px solid black; display: inline-block; padding: 2px 10px;">OFFICIAL ABSENTEE BALLOTING MATERIAL - FIRST-CLASS MAIL</div> <small>NO POSTAGE NECESSARY IN THE U.S. MAIL - DMM 703.8.0</small> SECRETARY OF STATE OF WASHINGTON CHAMPAIGN COUNTY ELECTIONS BOARD CHAMPAIGN COUNTY COURTHOUSE 1234 MAIN ST ANYTOWN WA 98765-4321 		

8.2.2 Postcard

The federal voting registration postcard application must be approximately 5 by 8 inches. The design shown in Exhibit 8.2.2 must be printed on the address side of the card.

Exhibit 8.2.2 Balloting Material Formats—Postcard

5"	Name and Complete Address _____ _____ _____ _____		U.S. Postage Paid 39 USC 3406 PAR AVION
	<div style="border: 1px solid black; display: inline-block; padding: 2px 10px;">OFFICIAL ABSENTEE BALLOTING MATERIAL - FIRST-CLASS MAIL</div> <small>NO POSTAGE NECESSARY IN THE U.S. MAIL - DMM 703.8.0</small> TO: _____ _____ _____		
	8"		

8.2.3 FIM (Facing Identification Mark)

The correct facing identification mark (FIM) as described in 507.9.8.8 must be printed on the address side of envelopes and cards.



FEDERAL VOTING ASSISTANCE PROGRAM

DEPARTMENT OF DEFENSE

WASHINGTON, DC 20301-1155

ENVELOPE DESIGN GUIDELINES

The Federal Voting Assistance Program (FVAP) administers the *Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA)*, which covers the voting rights of all members of the Uniformed Services, the merchant marine and their family members, and all U.S. citizens who reside outside the United States.

The most common barrier that Uniformed Service members and overseas citizens encounter when voting absentee is insufficient ballot transit time. Many of these citizens are located in remote areas around the world where regular mail delivery is unpredictable or difficult to obtain.

The FVAP works with the United States Postal Service (USPS) on a continuing basis to determine the most effective way to timely deliver voting materials to our citizens worldwide. The USPS suggests the following guidelines to expedite mail through the automatic mail processing system. Please disseminate this information to the local election officials in your state.

- Use **black** ink on **white** paper.
- Place the Facing Identification Marks (FIM), at the top and near the right hand corner of the mail piece. Generally, FIM C is used for business reply mail with a preprinted barcode, FIM B is used without a preprinted barcode. Consult with a mail piece design analyst for assistance if needed.
- Place the U.S. Postage Paid 39 USC 3406 in the upper right hand corner with the words PAR AVION printed below.
- The Uniformed and Overseas Citizens Absentee Voting Act is now reflected under section 703.8.0 of the Domestic Mail Manual (DMM) and should read:

“Official Absentee Balloting Material – First Class Mail
No Postage Necessary In The U.S. Mails-DMM 703.8.0”

- The new Official Election Mail logo can also be used on the envelope to quickly and easily identify voting-related mail. The logo cannot be resized or altered. However, FVAP has been advised by the USPS that the small application originally slated to be used on postcards only can be used on any size ballot transmission and return voting materials.

Your current supplies of voting materials may still be used. We suggest that upon depletion of your current stock of voting materials, the above recommendations be considered when designing new materials for printing in order to expedite mail processing. Consult with a mail piece design analyst at the USPS to assist with the design of your new mail piece.

If you have further questions, please do not hesitate to contact the FVAP at 1-800-438-VOTE (8683).

Last updated on July 1, 2005.



CHAPTER 9

POLLING PLACE AND VOTE CENTER MANAGEMENT

Introduction

Depending upon State law, every registered voter has the opportunity to participate in democracy by voting at an in-person early voting location during a designated time period prior to Election Day, voting at their polling place on Election Day, or by requesting an absentee ballot in the mail.

NOTE Absentee by mail voting requirements are covered in Chapter 7)

The various types of polling places/vote centers can be defined, as follows:

- ★ **Election Day Precinct-Specific Polling Place**—Each voting precinct is assigned to a unique polling place.
- ★ **Election Day Consolidated Precinct Polling Place**—Two or more voting precincts are assigned to a unique polling place. This is often based on several factors, including the number of voters in each precinct, size/location of the polling place facilities and the expected voter turnout for each polling place.
- ★ **Election Day Vote Center (jurisdiction-wide)**—Several polling place/vote centers strategically located throughout the jurisdiction where any voter in the entire jurisdiction can vote on Election Day.
- ★ **Election Day Vote Center (regional)**—Several polling place/vote centers strategically located by region where any voter within a specific region can vote on Election Day.
- ★ **Early Voting Vote Center (jurisdiction-wide)**—Several early voting vote centers strategically located throughout the jurisdiction where any voter in the entire jurisdiction can vote during the designated early voting time period.
- ★ **Early Voting Vote Center (regional)**—Various early voting vote centers strategically located by region where any voter within a specific region

can vote during the designated early voting time period.

A variety of polling place management requirements apply to all of the above types of voting locations, and likewise, other requirements are specific and unique, based upon which polling place method(s) is utilized in your jurisdiction.

The following types of management requirements apply to all polling places:

- ★ Buildings should be located in close proximity to the voters who are served by the location.
- ★ Property owner(s) must grant permission for the use of their building for voting purposes on Election Day.
- ★ The buildings selected for use as polling places must meet Federal and State accessibility requirements.
- ★ Buildings must have an adequate-sized room or hallway sufficient to meet the needs for setting up equipment and voter check-in stations, including adequate space for voters to wait in line.
- ★ Property owner(s) may be requested to open the building for poll worker use the evening prior to Election Day, and must be willing to open the building in the early morning hours of Election Day until after the close of the polls.
- ★ The property must have sufficient parking available for voters' use on Election Day.
- ★ Traffic ingress/egress must be evaluated, based on the number of expected voters on Election Day.

Requirements for a vote center polling place model include:

- ★ Secure real-time communication line between Vote Center(s) and the central election office voter registration computer software.
- ★ Ability to display all ballot styles on DRE equipment, or ability to store and secure large quantities of paper ballots for every ballot style.

- ★ A team of skilled, trained, computer-literate poll workers that can commit to working a designated number of early voting days.
- ★ Large centrally-located facilities equipped to handle large quantities of voters over an extended period of time.
- ★ Large parking area with easy ingress/egress.
- ★ Potential need for security guards during voting hours.
- ★ Runners available to monitor and respond to supply needs during early voting hours.
- ★ Cooperative agreement with area law enforcement agencies to provide traffic control during peak voting hours.

Locating Polling Place and Vote Center Sites

Depending upon State law, election officials are responsible for determining the number of polling places, their location, hours of operation, and which precincts to assign to each location.

Vote center locations should be selected in order to serve both the heavily populated urban cities as well as rural towns within your jurisdiction. In urban areas, they should be located near heavy traffic areas, large residential areas, major employers and public transportation routes. In rural areas, choose locations that are easily recognized within the community. If possible, choose locations that have served as polling places in the past.

Types of buildings to consider using as Vote Centers include:

- ★ Shopping Malls
- ★ Grocery Stores
- ★ Community Centers
- ★ Large meeting rooms, i.e. public library, city/county government buildings, etc.
- ★ Gymnasiums

Election Day polling places should be selected based on location within the neighborhood served by the polling place.

Types of buildings to consider for possible use as precinct-specific or consolidated polling places include:

- ★ Church activity and/or community rooms
- ★ School meeting rooms and gymnasiums, etc.

- ★ VFW, American Legion and/or Masonic Lodge activity rooms
- ★ City/county government meeting rooms
- ★ Apartment clubhouses
- ★ Country Club meeting rooms
- ★ National Guard and other training centers
- ★ Retirement building meeting rooms
- ★ Area business meeting rooms
- ★ Individual homes—often garages are used

If the polling place is located in a building which is privately owned, the election jurisdiction must be granted permission to use the facilities to process voters. Election officials rely on community support to provide this much needed space. By building partnerships within your city/county government and within the community, you can begin to build a data base of all possible polling places that meet your criteria.

Resources available, include, but are not limited to:

- ★ **City/ County Planning and Building Departments**—contact the staff and request that they place you on an email mailing list to be notified of any new permits issued for large buildings in your jurisdiction.
- ★ **Area telephone directories**—locate listings of churches, schools, apartment complexes, etc.
- ★ **County GIS/Mapping Department**—partner with their staff to assist your office with building a layer of data including location of the building, size, parking, ingress/egress, contact information, etc.
- ★ **Area Chamber of Commerce**—partner with them to develop an outreach program to all area businesses. Many businesses have large meeting rooms that would be suitable as a polling place on Election Day.
- ★ **Disabled community organizations**—these groups often will volunteer to provide assistance to your office in locating and securing accessible polling places.

Continue to build upon your data base of possible polling places. In the event of last minute emergency polling place cancellations, you will be prepared with possible alternative locations.

The process begins by making the initial contact with the property/building owner to request a site visit of the facility and premises for possible use of their facility on Election Day. This provides an opportunity for your staff to begin to develop a long-term

commitment and relationship with each property owner to help ensure that polling place locations stay as consistent as possible.

At the initial meeting, provide detailed information about upcoming election dates, voting hours of operation, expected vehicle/people traffic capacity, and other expectations, i.e. pre-Election and post-Election Day equipment delivery and pickup, and night before Election Day voting area setup requirements, and other accessibility needs. It is a good idea to leave an informational fact sheet at the end of your initial on-site meeting. Be sure to leave your business card or contact information and to follow up a few days later with a letter or phone call to answer any new questions. If approval is granted, immediately send out a commitment agreement confirming the use of the facility.

NOTE Be sure to check with your Legal Department to determine if a contract is required (see Sample Letter 9.2 on next page).

Inspection Requirements

Before finalizing acceptance of any building for use as a polling place, you must conduct an accessibility survey and needs assessment.

NOTE Portions of the following information are provided as excerpts from the Department of Justice's ADA Checklist for Polling Places, dated February 2004.

The following information is provided to help voting officials determine whether a polling place has basic accessible features needed by most voters with disabilities. It may be used when evaluating the accessibility of potential new polling places and when identifying physical barriers in existing polling places before temporary or permanent modifications are made to improve accessibility for elections.

Getting Started

An evaluation of polling place accessibility should focus on those areas of a facility that are important to voting. These often include parking for voters, a drop off or loading area, the entrance to the polling place, and the pedestrian routes (both exterior and interior) that voters use to get to the voter check-in and voting area.



Image 9.1: Sample of effective polling place accessibility signage.

Before a polling place is evaluated, it is useful for staff or volunteers to review instructions for completion of the facility checklist and become familiar with the questions. It is also helpful to practice taking measurements and recording information before beginning the evaluation.

When staff arrives at a polling place, it is best to first determine the location of parking, including accessible parking (if any is provided), the entrance that will be used on Election Day, and the location of the voting area. If the survey is being done to determine the accessibility of a new location for a polling place, then the walk-through should look for areas that provide the best accessibility, where simple modifications may provide accessibility, or where it may be easiest to improve accessibility by adding temporary features.

Using the Polling Place Checklist

A few simple tools may be used to measure the sizes and the slope of specific elements and spaces:

- ★ A metal tape measure at least 15 feet long
- ★ A level with a bubble measure or a digital measure at least 24 inches long for measuring slope, and
- ★ A clipboard, copy of the checklist (one copy per polling place), and pens or pencils...

NOTE It is also a good idea to have a film or digital camera to document important areas that may need to be reviewed later.

One person can complete a survey of a polling place but it is often quicker and easier for two people to work together. One can be responsible for taking the measurements and the other for recording the information and taking any photographs.



Sacramento County
Voter Registration and Elections
7000 65th Street, Suite A, Sacramento CA 95823

Use of Your Facility as a Polling Place

Tuesday – March 27, 2007

An on-site survey of every facility used as a polling place is required. When this survey has been completed, the facility will be added to the polling place files as a possible site for a polling place.

The surveyor does not assign a facility as a polling place.

The surveyor is locating possible polling places only.

The election office will determine the exact site to be used as a polling place for each election.

If your facility is selected, a confirmation letter will be sent to you. This letter must be signed by the owner or contact person and returned to the Elections Office prior to the site being assigned.

The current fee paid for the use of a facility used as a polling place is \$50.00. It is assumed that public facilities will be used free of charge per California Elections Code.

The minimum space required for a polling place is 15 by 20 feet. One electrical outlet must also be available for use.

A polling place must meet all Handicapped Accessibility requirements.

The facility must be open and available to the precinct board from 6:00 am Election Day morning, until approximately 10:30 pm election night. Voting hours at the polling place is 7:00 am until 8:00 pm.

The polling place must be free of any activities that would conflict with the voting process.

The precinct officers will bring with them all supplies needed for conducting the election. All supplies brought by the precinct board will be removed when they leave election night.

You will be asked to provide an 8-foot table (or two smaller tables) with 6 chairs. If you cannot, please contact the election office, and arrangements will be made to have them delivered.

If you have any questions, or need further information, please call the Precinct Operations section at (916)875-6618.

tip

Complete the survey by drawing a floor plan of the polling place, including the voting area. Attach this diagram to the signed polling place agreement.



Image 9.3: Measuring slope using a 24-inch level and tape measure.



Image 9.4: Using a tape measure to measure the width of a parking space.



Image 9.5: Measuring the clear opening from the face of the doorstop on the frame to the face of the open door.”

Taking Measurements

Sloped Surfaces—One way to measure slope is to use a 24-inch level with leveling bubble and a tape measure. Place the level on the incline in the direction you wish to measure. Rest one end of the level at the highest point of the sloped surface and lift the other end (as shown in the illustration) until the bubble is in the middle of the tube. This is the “level” position. While the level is in this position, measure the distance between the end of the level and the sloped surface below. If the distance is 2 inches or less, then the slope is 1:12 or less. When the distance is greater than 2 inches, record the distance on the checklist so the exact slope may be calculated later if needed.

Slopes may also be measured using a digital level. The digital display replaces the bubble and typically gives a reading that may be shown as a digital bubble, degrees, or a percent. Before using a digital level make sure to familiarize yourself with the directions. Many digital levels need to be calibrated each time they are used. If you can set the digital display to percent or degrees, the maximum slope generally allowed is 8.33% or 4.76 degrees (for a 1:12 slope).

Using the Tape Measure—When measuring the width of a parking space or access aisle, the width of an accessible route or the height of an object above the floor, for example, try to keep the tape from sagging or bending. If the tape is not straight, try to support the tape in the middle or pull it tight and take the measurement again.

Measuring Door Openings—Measuring the clear opening of an accessible door requires special care. To measure the opening of a standard hinged door, open the door to 90 degrees. Place the end of the tape measure on the side of the door frame next to the clear opening (as shown in the drawing). Stretch the tape across the door opening to the face of the door. This measurement equals the clear open width of the door, which is typically less than the width of the door.

Completing the Checklist

A recommended checklist is based on requirements from the ADA Standards for Accessible Design (Standards). Election officials can find a copy on the web at: <http://www.usdoj.gov/crt/ada/votingchecklist.htm>. Each item includes a reference to the technical requirements in the Standards from 28 C.F.R. Part 36, Appendix A. This reference is provided to assist users

in looking up the requirement or related requirements when necessary. An electronic copy of the Standards is available on the ADA Website at www.ada.gov. Printed copies are also available from the ADA Information Line at 800.514.0301 (voice) or 800.514.0383 (TTY).

After Completing the Survey

Completed polling place surveys will provide the information needed to determine which sites are accessible and which may become accessible with permanent or temporary modifications. Checklists where most answers are “yes” will usually indicate an accessible polling place. Others, where some answers are “no,” may become accessible if permanent or temporary modifications are done to remove barriers. Polling places in older buildings may have few accessible features but some of these voting facilities may be able to be made accessible with temporary modifications, such as portable ramps at the entrance and accessible parking spaces marked off by traffic cones. There may also be some sites that cannot be made accessible so plans will be needed to offer accessible voting in some other way.

Getting to the Polling Place—Typical Issues

When parking is provided for voters, staff and volunteers, accessible parking must be provided for people with disabilities. Voters with disabilities who arrive by car need a parking space close to an accessible entrance. The accessible parking space has an adjacent access aisle that provides needed room for a person to open the car door fully and then stand with the aid of a walker, to transfer to a wheelchair, or to lower a wheelchair lift. The access aisle connects directly to an accessible route that leads to an accessible building entrance. In order to be usable, the access aisle must be relatively level, clear of gravel or mud, and the surface must be in good condition without wide cracks or broken pavement.

An accessible route connects the access aisle of each accessible parking space with the accessible entrance to the polling place. When an accessible route crosses a curb, a curb ramp must be provided. If the accessible route connects the access aisle to the accessible entrance using the parking lot surface, a marked crosswalk should be provided on the vehicular route.



Image 9.6: Van-accessible parking spaces serve both cars and vans. A wide access aisle is needed so a wheelchair lift may be lowered from the van onto the level surface.



Image 9.7: Temporary Solutions for Election Day Parking.



Image 9.8: By placing an orange cone in the adjacent parking stall, this polling place now meets van accessibility parking requirements.

Temporary Solutions for Election Day—Parking

Problem One: Parking is available, but no accessible parking is provided or there is not enough accessible parking or van-accessible spaces.

SUGGESTION Find a relatively level parking area near the accessible entrance and then designate the area for accessible parking spaces and adjacent access aisles. Use three parking spaces to make two accessible parking spaces with an access aisle. Traffic cones or other temporary elements may be used to mark the spaces and access aisles. Provide a sign designating each accessible parking space and make sure the access aisle of each space is connected to the accessible route to the accessible entrance.



Image 9.9: Laminated accessible signs mounted on a wood stand provide accessibility requirements for this polling place parking area.

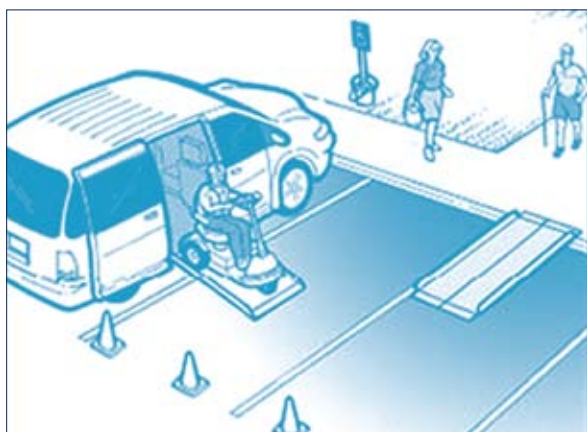


Image 9.10: Three standard parking spaces are converted into an accessible parking space with an access aisle. Cones mark the access aisle and a temporary curb ramp with edge protection connects to an accessible route to the polling place.

Problem Two: Accessible parking is provided, but it does not have a marked access aisle next to each accessible space.

SUGGESTION Re-stripe the accessible parking spaces to provide an access aisle. As a temporary solution for Election Day, use traffic cones to mark off the access aisle and curb ramp area. The first accessible parking space provided should be a van accessible parking space with an access aisle that is at least 96 inches wide.

Problem Three: Accessible parking spaces or access aisles are on a sloped surface.

SUGGESTION Find a parking area that is close to the accessible entrance and more level. Provide accessible parking spaces and access aisles in that area. Make sure the accessible parking spaces connect to an accessible route to the entrance. Provide a sign designating each accessible parking space.

Problem Four: No sign with the international symbol of accessibility is installed at each accessible parking space.

SUGGESTION Provide a temporary sign in front of each accessible parking space.

Temporary Solutions for Election Day—Passenger Drop-Off Areas

Problem: A passenger drop-off and loading zone is provided but there is no curb ramp between the vehicle area and the sidewalk leading to the accessible polling place entrance.

SUGGESTION Provide a portable ramp with edge protection in an area where the vehicle area and the sidewalk are relatively level. The curb ramp must connect to an accessible route to the accessible polling place entrance.

If the drop-off and loading zone is not relatively level, consider relocating the accessible drop-off area and using one parking space next to the area where accessible parking is located to provide an accessible drop-off and loading zone. Cones or another temporary barrier may be needed to keep the parking space clear.

Sidewalks and Walkways—Typical Issues for Voters Who Use Wheelchairs, Scooters or Other Mobility Aids

There must be at least one exterior accessible route that connects accessible passenger drop-off areas, accessible parking spaces, and other accessible elements, for example a route from a bus stop to an accessible building entrance. The accessible route is essential for people who have difficulty walking or who use wheelchairs or other mobility aids to get to the accessible entrance of the polling place.

An accessible route is at least 36 inches wide and may narrow briefly to 32 inches wide where utility poles, post-mounted signs, furniture, and doorways are located along an accessible route. Abrupt level changes, steps, or steeply sloped sidewalks cannot be part of an accessible route. Where ramps are used, they cannot be steeper than 1:12. Ramps with a vertical rise of more than 6 inches must have handrails on both sides. Ramps must also have edge protection to stop wheelchairs from falling off the sides, and level landings at the top and bottom of each segment and where a ramp changes direction.

NOTES Refer to Image 9.12 for examples of accessible entrance, parking, and drop-off area at polling place.

1. Accessible route.
2. Accessible drop-off area.
3. Accessible parking with van accessible parking space.
4. Accessible entrance to polling place.

Temporary Solutions for Election Day—Sidewalks and Walkways—Voters with Mobility Disabilities

Problem One: The sidewalk connecting parking to the polling place entrance is too steep to be accessible.

SUGGESTION Check to see if there is another sidewalk that provides an accessible route to the accessible entrance. Sometimes there is a less direct route that can serve as the accessible route. (see image 9.11)

Problem Two: The accessible route crosses a curb and no curb ramp is provided.

SUGGESTION Install a portable ramp with edge protection. (see image 9.12)

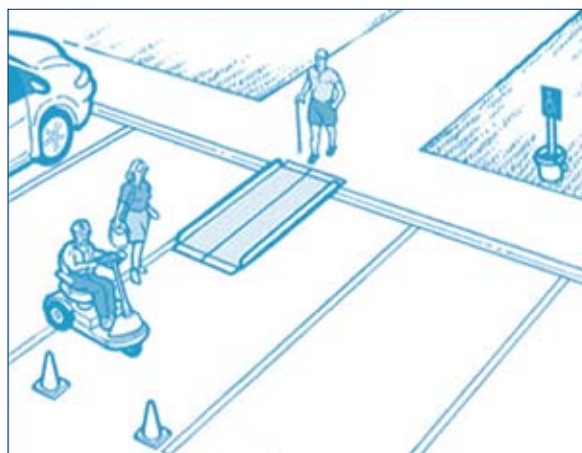


Image 9.11: A portable ramp with edge protection is installed over a curb to provide an accessible route.



Image 9.12: An accessible entrance to a polling place with accessible parking and an accessible drop-off area.



Image 9.13: Accessible polling place entrance.



Image 9.14: EAC sample of effective polling place accessible entrance signage.



Image 9.15: Example of polling place location.



Image 9.16: Example of polling place entryway made accessible by placement of wooden ramp over the entry threshold.

NOTES Refer to Image 9.13 for examples of accessible entrance to a polling place.

1. Accessible entrance to the polling place.
2. Accessible route connecting accessible parking and drop-off area (if provided) to the accessible entrance.

Problem Three: One or two steps are part of the walkway leading to the accessible entrance.

SUGGESTION Install a portable ramp no steeper than 1:12 slope with edge protection and handrails. (see image 9.13)

Entering the Polling Place—Building Entrance

Typical Issues

An accessible polling place must have at least one accessible entrance. The accessible entrance must be connected to an accessible route. An accessible entrance must provide at least one accessible door with maneuvering space, accessible door hardware, and enough clear width to allow people who use crutches, a cane, walker, scooter or wheelchair to use it.

If the accessible entrance is not the main entrance to the polling place, then signs must be located at inaccessible entrances to the polling place to direct voters to the accessible entrance. The accessible entrance must remain open when the polling place is open.

Temporary Solutions for Election Day—Accessible Entrance to Polling Place

Problem One: One or two steps at the entrance prevent access.

SUGGESTION If another entrance is accessible and on an accessible route from accessible parking, designate it as the accessible entrance and install a directional sign at the main entrance directing voters to the accessible entrance. Keep the accessible entrance unlocked during voting hours. (see image 9.14)

If another accessible entrance is not available, install a temporary ramp with edge protection and handrails. (see image 9.17)

Problem Two: There is a small step at the entrance.

SUGGESTION Install a short temporary ramp to provide a smooth transition. (see image 9.15)

Problem Three: Entrance door threshold has an abrupt change in level of more than 1/4 inch and no beveled sides.

SUGGESTION If the threshold is not more than 3/4 inches high, add beveled surfaces to both sides of the threshold or replace with a new threshold that is no more than 1/2 inch high and that has beveled sides.

Problem Four: Entrance door to the building is heavy and difficult to open.

SUGGESTION Keep the door propped open or station volunteers near the door to open it for voters.

Problem Five: Door handle and/or latch at the entry door is not accessible.

SUGGESTION These are three typical solutions: add an accessible pull or handle to the outside of the door and leave the door unlatched, or install an accessible door handle and hardware, or leave the door propped in an open position.

Voting Area

Typical Issues

The accessible voting area must be on an accessible route and have an accessible entrance and adequate circulation and maneuvering space for voters who use wheelchairs or scooters or who walk with mobility aids.

An accessible route must connect the accessible building entrance to the accessible voting area, which includes voter check-in and the location of the accessible voting machines. The survey should also identify any protruding objects (wall-mounted or overhead) along the circulation route to voter check-in and the voting area.

NOTES Refer to Image 9.20 for sample layout of an accessible voting area.

1. Accessible route connects the building entrance with the voting area, including voter check-in and accessible voting machine.
2. Accessible door or doorway to voting area

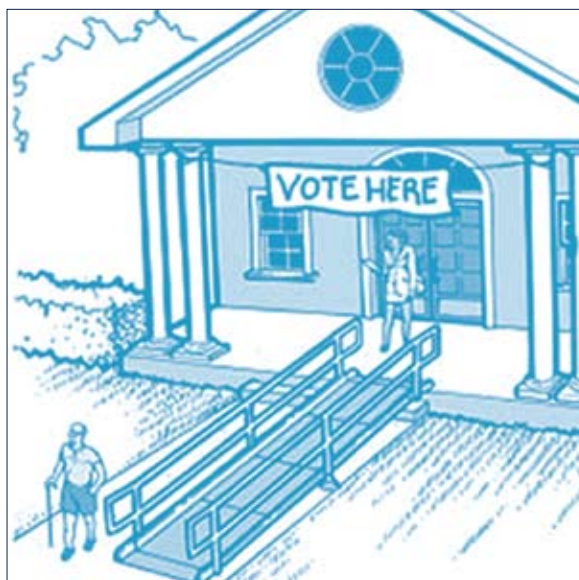


Image 9.17: A portable ramp with handrails and edge protection is installed over a step(s) at the entrance of a polling place.



Image 9.18: Include an Exam wooden block inside your poll worker ADA supply kits for use in propping open the doorway to the polling place.

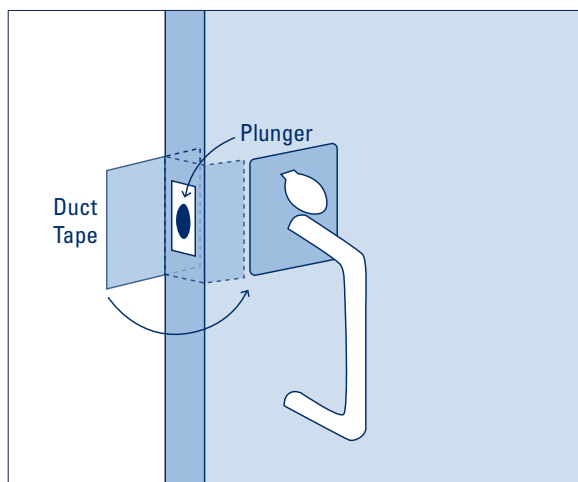


Image 9.19: Include duct tape in your poll worker ADA supply kit. Instruct them to use the tape on the door plunger on outside door.

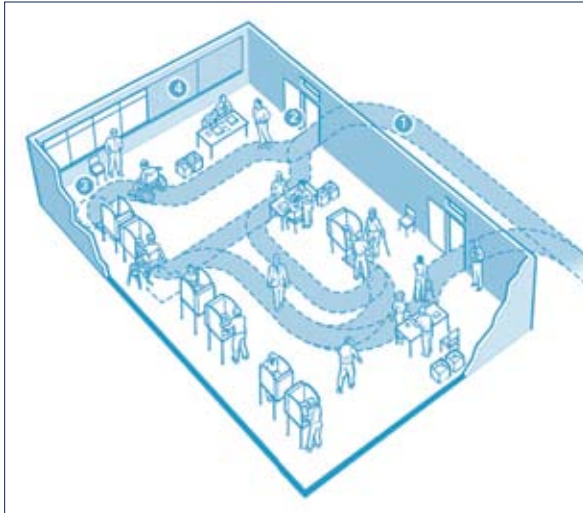


Image 9.20: Voting area accessibility.



Image 9.21: Example of accessible interior voting area.

3. Turning space at accessible voting machine
4. Blinds closed on windows behind check-in so voters who read lips can communicate with the voting staff.

Summary of Suggested Polling Place Supplies to Assist Voters with Disabilities

- ★ Voting Supplies—Provide pen and pencil attachments to make the writing utensils easier to grasp. Print voting instructions in large type. Include magnifying glasses for use by the visually impaired and a voting booth that has been modified for use by voters who use wheelchairs or who prefer to sit while voting.
- ★ Facility Modification Supplies. Provide a temporary threshold ramp to make doorway entrances accessible.
- ★ Signage—Deliver “Accessible Parking” signs to polling places to reserve parking for disabled voters. Place directional signs to indicate the location of these parking spaces. Instruct poll workers to post “Accessible Entrance” signs to direct voters to an alternate entrance when the main entrance is not accessible.
- ★ Provide large orange cones to designate a van-accessible parking spot. Instruct poll workers to identify the closest parking to the polling place entrance that is on an accessible route of travel, and block off the space to the right with the cones to create an access aisle and place a sign in front of the parking designating it as “Accessible Parking.”
- ★ Provide rubber mats to cover gratings along the path of travel that may be hazardous to voters with disabilities.
- ★ Provide wooden door stops to hold the doors open and mitigate potential barriers. Include duct tape and instructions on how to temporarily resolve inaccessible door hardware such as round knobs or thumb latches.

10 Steps to Achieve Accessible Polling Places

1. Outline a timeline for surveying sites and categorize them into three different categories: (a) compliant; (b) compliant with mitigation; and (c) non-compliant. Notify owners of non-compliant facilities and ask about any plans to remove architectural barriers. If these sites are owned by the County, meet with appropriate county departments to identify a schedule for improvements.
2. Document your Polling Place Selection Plan, including details on how you identify and select the most accessible locations.
3. Conduct surveys of polling locations, using the guidelines/survey tool provided by your State election office.
4. Obtain training on how to use the various survey tools and become familiar with the requirements of Title 24 and ADA.
5. Mitigate barriers where possible. Purchase temporary door thresholds, temporary ramps, cones to create van accessible parking spots and to block protruding objects, signs to direct voters to accessible parking and entrances, and other items to improve accessibility at the polls.
6. Consolidate voting precincts into sites that provide maximum accessibility.

7. Establish a county Voter Accessibility Advisory Committee and meet at least quarterly with the committee to review and update your program.
8. Work with disability rights groups in your community, such as Independent Living Centers, Commission on Disabilities, etc., to obtain their input and keep them updated on your efforts.
9. Provide poll workers with written materials and training to serve voters with specific needs, including a check list of proper set-up of a polling site to meet accessibility requirements.
10. Provide a guide to voters outlining services provided to voters with specific needs.

Facility Management:

Management of polling place/vote center facilities incorporates all facets of opening/operating a business that provides a service to the general public. As in every business operation, your success depends upon:

- ★ Having the right location
- ★ Easy and accessible ingress/egress to your building and parking area
- ★ Signage that is easy to read and identifies your building as a vote center/polling place
- ★ Plenty of nearby parking
- ★ Friendly, courteous and well-trained staff and support staff
- ★ Easy to follow voter instructions
- ★ Sufficient quantity of supplies, i.e. ballots, pens, envelopes, etc.
- ★ Line management techniques
- ★ Assistance in finding answers to your questions
- ★ Appreciation for participating in the voting process
- ★ Opportunities to provide feedback and recommendations to improve the process

Polling place management is a unique business because locations are located throughout the jurisdiction and are open for a 12–13 hour period of time on one specific day, Election Day. All other days of the year, the buildings are used for other purposes. Voters (customers) can choose to vote at any time during the 12–13 hour period, however, in most jurisdictions, there is a peak voter turnout period in the early morning and again in the early evening hours—before and after work.

Jurisdiction-wide vote center management incorporates all of the techniques used to manage Election Day polling places, and more. Locations where any voter in the jurisdiction can vote at any time require proper planning to ensure that voters do not encounter traffic congestion, lack of parking, and long wait lines. Vote centers require the use of electronic poll books with credit for voting automatically updated in real time, ensuring that no voter can vote twice in an election.

Determining the Right Location

Election officials must rely on a variety of resources in order to select the right locations for use as polling places or vote centers. Factors that influence those decisions include:

- ★ State law permitting consolidation of several precincts into one polling place and/or the use of regional or jurisdiction-wide Election Day vote centers.
- ★ Accessibility requirements, as noted above
- ★ Expected voter turnout for each election
- ★ Building occupancy limits and parking availability
- ★ Proximity of building location to voters being served

Based on this information, a simple spreadsheet can be prepared for each election and would include:

- ★ Number of registered voters in every precinct multiplied by the expected voter turnout
- ★ New “expected to vote” number per precinct

The above information can be merged with polling place data to determine the best location for use as a polling place. Based on the capacity of the building and parking, it is possible that several precincts can be served in one building. An example of a “mega” consolidated polling place is on the next page.

In this example, there are several check-in stations, arranged alphabetically. The master registration list is printed alphabetically, rather than by precinct. Voters simply choose the correct check-in table, obtain the correct precinct ballot style, and proceed to any of the available voting booths. Poll workers are stationed at the exit door with ballot containers and/or optical ballot scanners.

The type of voting system or number of paper ballot styles will determine the number of precincts best served by this model.

After polling places have been assigned, it is recommended that election officials assign experienced poll workers to the polling place locations expecting

MEGA CONSOLIDATED POLLING PLACE

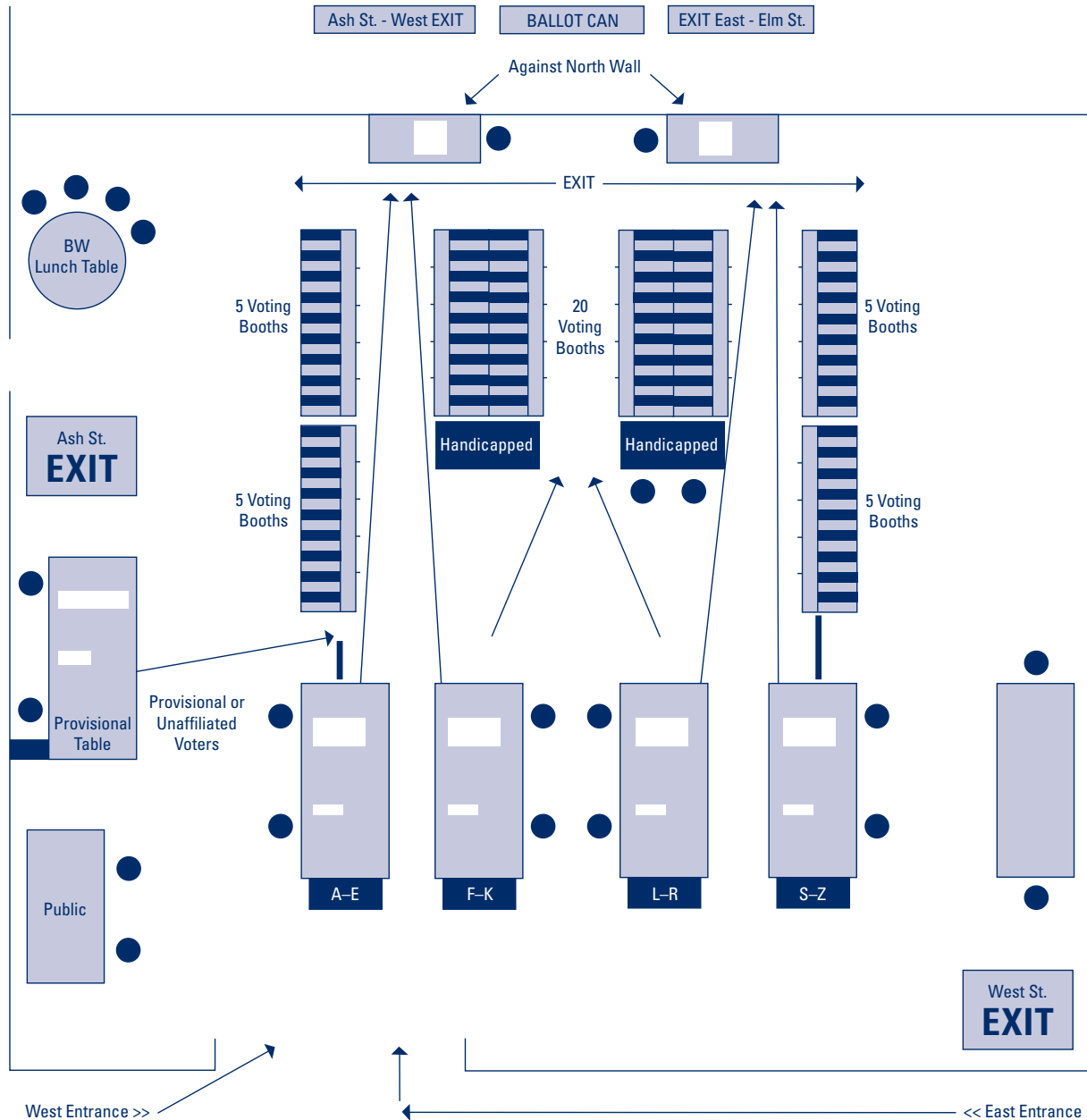


Image 9.22: Sample layout of a mega consolidated polling place (based on sample from McPherson County, KS).

VOTE CENTER LAYOUT—LARIMER COUNTY, COLORADO

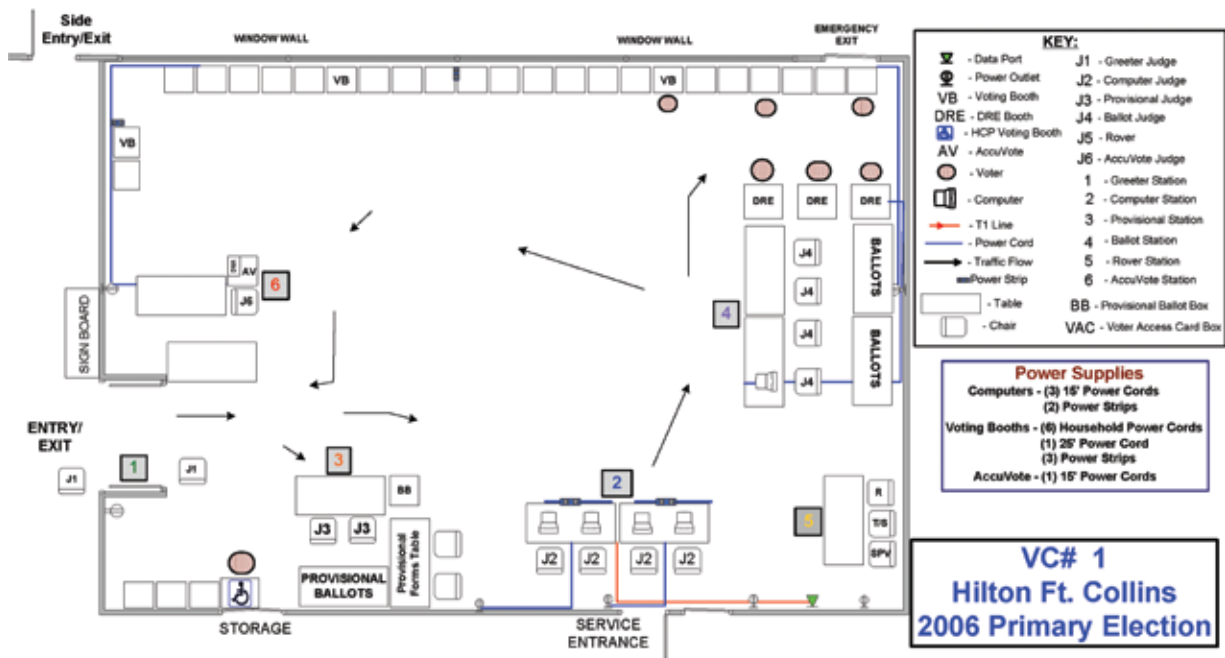


Image 9.23: Sample vote center layout (Larimer County, CO).

the largest number of voters and/or locations that are being utilized as consolidated polling places and/or regional or jurisdiction-wide Election Day vote centers.

Exterior and Interior Signage

All voting locations must be visible and easily identifiable from the street. Examples of exterior and interior signage include:

Well-trained check-in staff

The use of vote centers can reduce the total number of election workers required; however, the election workers must have the skill sets necessary to access computer terminals for voter check-in.

Types of election workers required include:

- ★ Computer check-in judges who manage the computer terminals and/or electronic poll books;
- ★ Greeters who greet the voter and manage the exit station (often "I Voted" stickers are issued as voters exit the polling place);
- ★ Ballot Judges who issue the correct ballot style or escort voters to a voting machine; and
- ★ Provisional Judges who manage the issuance of provisional ballots.



Image 9.24: Example of polling place/vote center exterior signage



Image 9.25: Sample of effective interior polling place signage.



Image 9.26: Check-in staffs are assigned to greet and direct voters.



Image 9.27: Adequate signage and ballot box security is required.



Image 9.28: Line management techniques in place at a vote center location.

Specialized training sessions on how to use the electronic poll book or computer check-in stations are required. It is a common practice to train certain workers on a specific task and to train only a few workers on all positions.

Setup and Layout of a Vote Center

Depending upon the type of facility selected for use as a Vote Center, the internal design layout is critical to success of the location (see Images 9.22 – 9.23 for samples of a vote center layout).

It is important to consider several factors when developing the layout of each vote center:

- ★ Number and size of rooms to be used;
- ★ Computer network capacity;
- ★ Number of staging areas required for voter processing;
 - Examples include: Completion of forms, computer check-in, ballot distribution, voting area, and exit area
- ★ Security measures; and
- ★ Voter privacy

Managing parking and traffic control

Vote center locations are selected based on easy access and sufficient parking. It is important to develop a contingency plan for managing peak voter turnout days and times. For example, the days preceding a Presidential election are peak voting days at vote center locations.

Management of voter traffic and parking as well as internal line management are all factors leading up to a successful election.

A contingency plan for managing these peak turnout days would include:

- ★ Additional staff and/or poll workers;
- ★ Parking attendants; and
- ★ Traffic control officers

Preparation and Distribution of Supplies and Equipment

Equipment and supply delivery is handled in a variety of ways, depending upon State law and local jurisdiction practices and procedures. Voting equipment can be delivered by the county staff members, by a delivery company, or distributed to Judges for delivery on Election Day. If you are delivering the equipment yourself,

you will need to develop a routing schedule, based on delivery requirements for each of your polling places. It is a good practice to develop a data base that contains all of your polling place information to enable you to print a polling place delivery form for each location and to schedule delivery routes. This information would include special requirements such as specific delivery dates and times, and whether a key is provided to the election staff prior to Election Day. If you are contracting the services of a delivery company, consider awarding the bid to a company that can do its own delivery routing schedule. Be sure to include the following in your delivery contract specifications:

- ★ Deadlines for delivery
- ★ Handling requirements, such as padding the machines, stacking or not stacking the machines, etc.

Many jurisdictions have implemented bar code tracking systems to confirm the delivery and location of each piece of equipment. Request the delivery staff person and the person receiving the equipment at the polling place to sign the delivery form (see Sample Form 9.31).

Polling place supplies include everything from the precinct registration list to pencils, pens, ballot boxes, portable booths, outdoor/indoor signage and “I Voted” stickers.

Certain supplies are distributed to poll worker Judges in the days leading up to Election Day, while other supplies that are generic in nature are often delivered to the polling place along with the voting equipment. Poll worker training should incorporate specific guidelines on confirming receipt of correct supplies prior to Election morning.

Methods used for packaging the supplies have been found to impact the successful setup of a polling place. For example, some jurisdictions package the supplies based on the area to be setup:

- ★ Supplies for the registration check-in table are packaged in one container;
- ★ Supplies for the provisional ballot table are packaged together;
- ★ Indoor and outdoor signage is packaged separately, etc.

This allows the poll workers to quickly separate supplies and duties on Election morning in order to efficiently set up the location.



Image 9.29: Example of a vote center located in a grocery store.



Image 9.30: Example of a vote center located in a shopping mall area.

Color coding the supplies also helps poll worker quickly identify which supplies need to be delivered back to election headquarter on election night. Laminated reminders packaged within the supplies also serve as visual aids for poll workers. Consider strategically placing these reminders in areas of critical importance.

VOTING MACHINE DELIVERY INFORMATION

2008 Kansas Primary Election - Tuesday, August 05, 2008

ROELAND PARK COMMUNITY CTR - 2325
4850 ROSEWOOD DR
ROELAND PARK KS 66205

PHONE: 826-3130

FAX: 826-3136

HOURS: M-F 8-5

Contact Persons:

JANE HURST, CENTER DIRECTOR
JOHN CARTER, CITY ADMINISTRATOR
JOHN TAYLOR, CUSTODIAN

Day:

826-3131

722-2600

826-3133

Residence:

555-1584

555-4859

Location:

ROOM # 4 . ENTER FRONT, TURN LEFT, SECOND DOOR ON RIGHT. HANDICAP ENTRANCE SAME.

Delivery Instructions

CONTACT JANE HURST (826-3131) FOR TIME AND LOCATION IN BUILDING FOR DELIVERY

Comments:

CALL ON WAY & ASK FOR JOHN TAYLOR. 12@ SET UP TEAM TO COME BY AS LATE AS POSSIBLE ON MONDAY 02@ FRI 8/1 AUG08

EP218

MACHINES DELIVERED:

5

F/S 01

Machines received by: _____

Machine location: _____

Portable booth delivered: _____

Green suitcase # 218 delivered: _____

Machine numbers delivered:

206876

206879

206881

206882

206883 Encoder

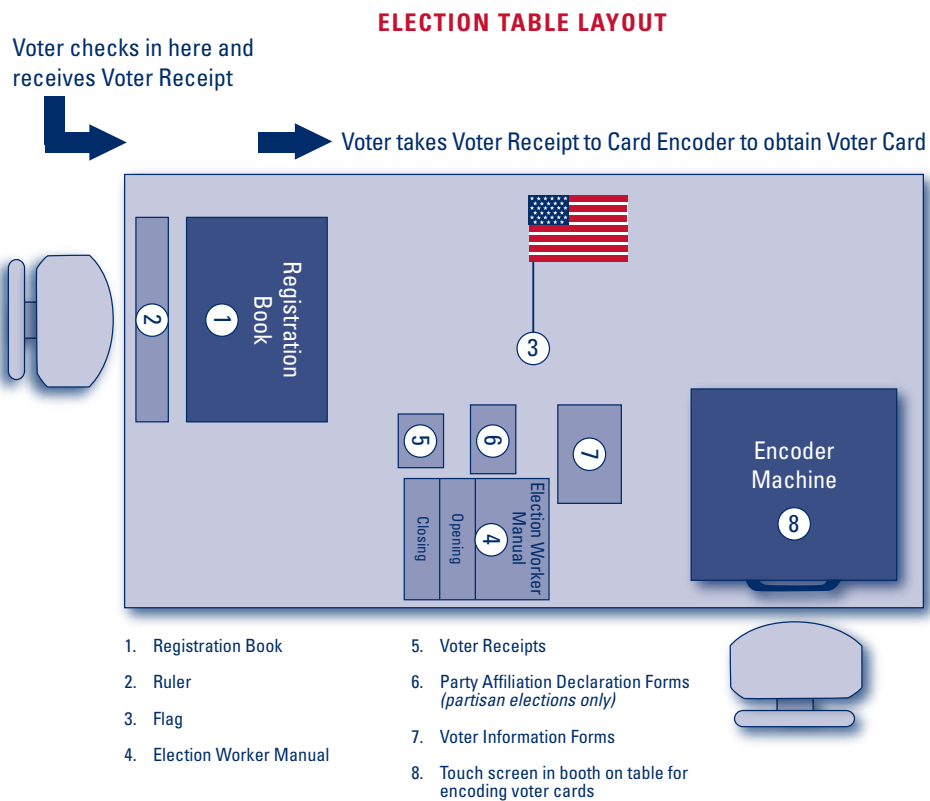


Image 9.32: Sample election table layout (Johnson County, KS).

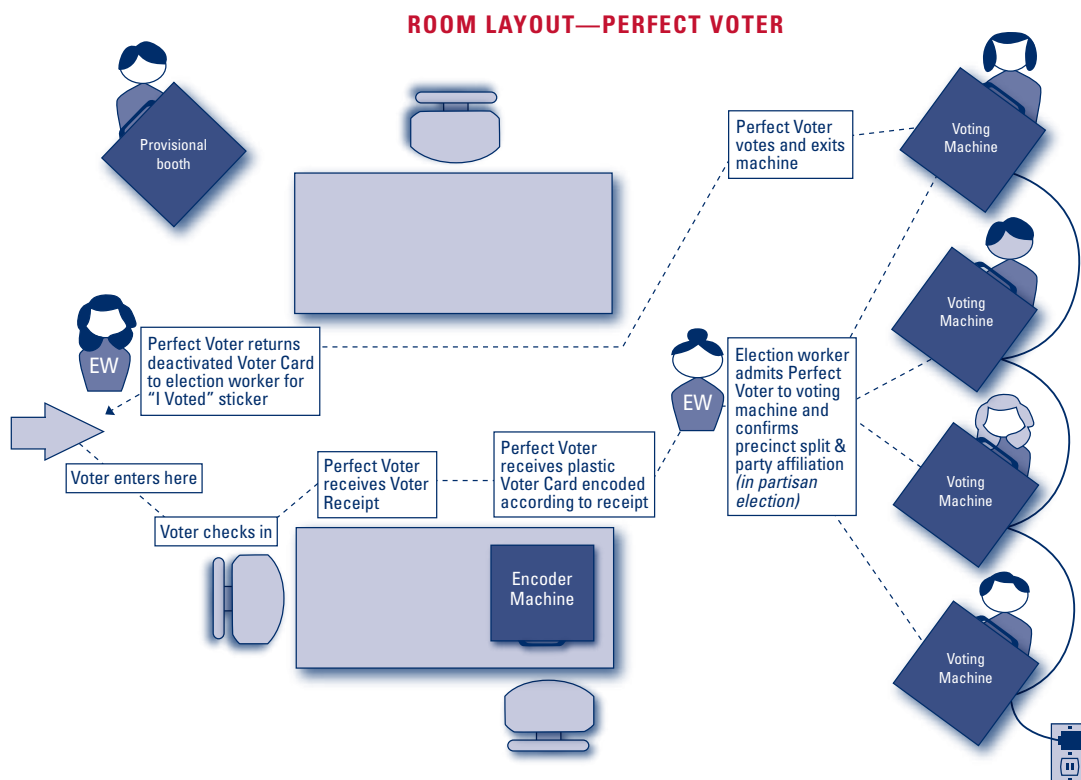


Image 9.33: Sample room layout – perfect voter (Johnson County, KS).

Some jurisdictions provide interior layout diagrams for each polling place (see Images 9.32 – 9.33). This is very helpful for poll workers to follow and also ensures the election official that the location is set up according to their requirements.

Forms and procedures must also be easy to follow and simply to complete. Opening and closing certification forms should be designed to collect required data, but should also be easy to understand (see Sample Form 9.34).

Checklists should be developed for use in opening and closing the polls. Poll workers should be trained to always work in teams of two when managing the voting equipment and/or distributing ballots. It is important for poll workers to understand the importance of each policy and/or procedure. Take time during your training sessions to explain why each procedure is in place. For example if absentee ballots cannot be turned in at the polling place, be sure that the poll workers understand that this is a State law, and is not an option.

Flow charts help poll workers remember the steps to follow when processing voters. Consider developing several flow charts for use at check-in tables (see Sample Form 9.35).

Election Day technicians and/or rovers can also be used to verify and confirm that all polling places are open to the public and set up according to election office policies and procedures. Provide a checklist for

each polling place and ask the rover and the polling place poll worker Judge to complete the checklist and sign for return to the Election Office. These signed checklists become a part of your official election audit trail. (see Sample Form 9.36).

Staffing, Training, and Support

Support for Election Day activities begins in the early morning hours and continues until all of the polling places are closed and election results are reported to the public. This support is provided through the use of rovers/technicians who are assigned to a region which includes a certain number of polling places. The supplies issued to rovers include a cell phone and additional polling place supplies in the event of a shortage occurring at any location in their region.

Back at the election office, staff is on hand to answer telephone calls beginning an hour before the polls open. These calls range from poll workers absences... to assistance with opening voting equipment...to answering basic questions about where to find supplies and how to set up the voting location.

It is important to routinely review the capacity of your telephone system and monitor its usage on Election Day. Election officials often set up dedicated telephone lines to respond to poll worker questions, with separate lines devoted to answering voter questions.

SAMPLE FORM 9.34: VOTING MACHINE CHECKLIST (BASED ON SAMPLE FROM GUILFORD COUNTY, NC)

Return this form in your forms carrying case. List the terminal and seal numbers (seal # on the machines when delivered, seal # when machines are opened election morning, seal # when machines resealed on election night). If there are discrepancies between the seal numbers on a machine, contact the office immediately at 641-3836. If another machine is delivered to you during the day, do not forget to list that machine.

All voting terminals have already been opened, with zero tapes printed. **Record the public count prior to 6:30 am on Election Day** in the appropriate column. The public count on the terminals should be zero. If any machine has a public count other than zero, contact the office immediately at 641-3836.

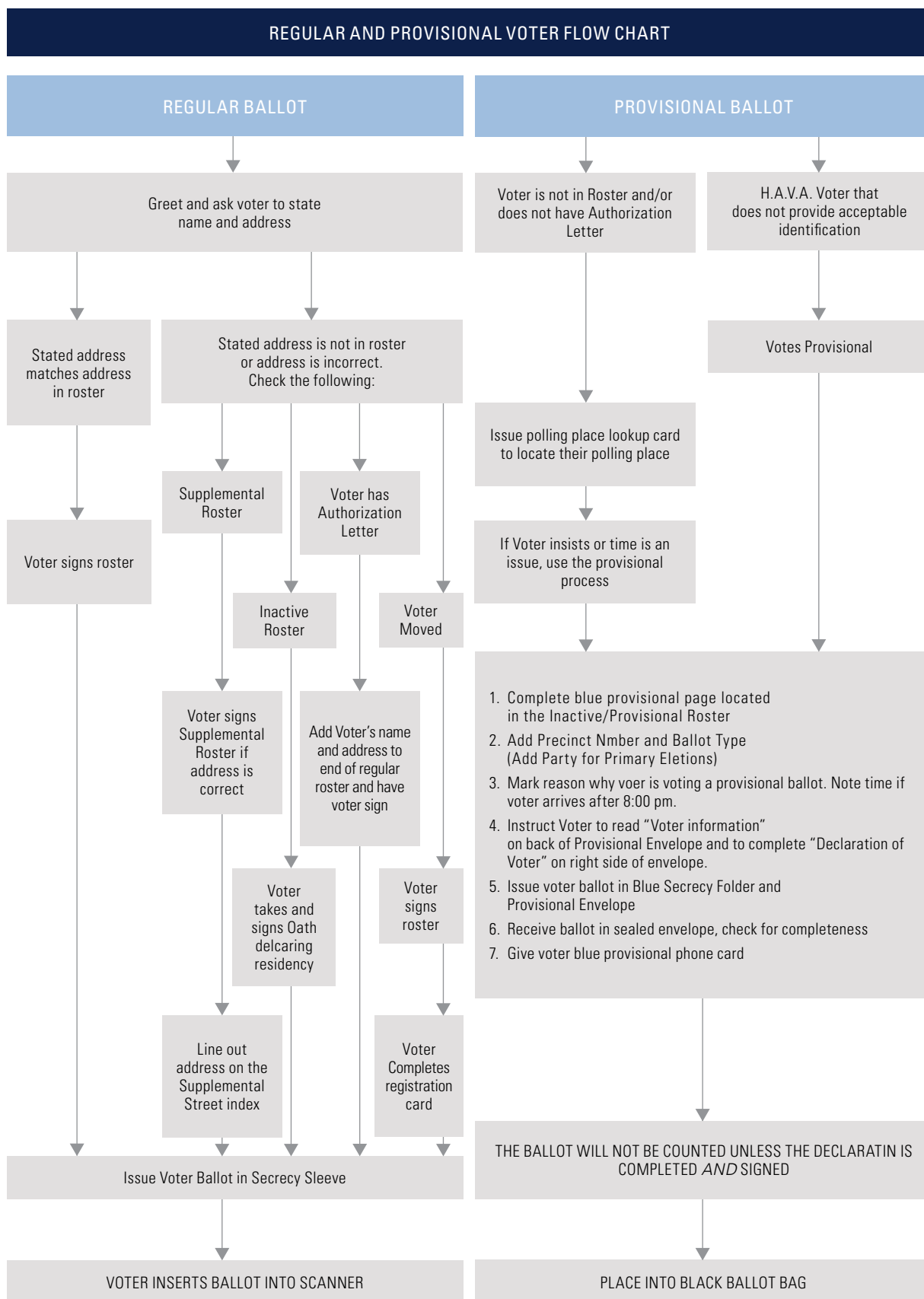
Precinct Number of Machines Chief Judge Signature

Terminal Number	Seal # Applied at Warehouse#	Monday—Seal # Delivered	Tuesday—Seal # Election Morning	Public Count Election Morning	Seal # Election Night

Zero Tape Printed

Machine Technician Initials _____

SAMPLE FORM 9.35: SAMPLE VOTER PROCESSING FLOW CHART (based on sample from Sacramento County, CA)



FIELD SUPERVISOR POLLING PLACE REPORT

POLLING PLACE:

EP CODE:

ELECTION: August 3, 2004 Primary Election

Tech Area:

VISUAL POLL CHECKS

- ☐ Outdoor signs posted
- ☐ No campaigning signs within 250 ft.
- ☐ "Vote here if you live here" map and pink sample ballots are posted
- ☐ Machines are plugged in and electrical cords are out of the way and taped down, if necessary, so that voters do not trip
- ☐ All voting machines read "AC Online" and top light in upper left hand corner of unit is yellow
- ☐ Please be sure to check that the encoder machine says "Charging." You will have to touch "Close," then touch "Create Voter Cards" after verifying that the machine is charging
- ☐ Voters' backs are to the wall or situated in another manner that prevents their ballots from being seen
- ☐ Brown Envelopes are attached to the side of the machines with a binder clip for voter receipts
- ☐ All voters are stopping at the check-in table and receiving either a White receipt or a provisional ballot envelope
- ☐ Voters are signing in Registration book or worker is writing letter "P" for paper ballot voters
- ☐ Writing the first letter of last name and the line number, the precinct part number, and the party affiliation (August only) on the voter receipts
- ☐ Not using anything other than their fingers or a Q-tip to touch the screens
- ☐ Giving Voter Receipt and Voter Card directly to Machine Judge
- ☐ Machine judge is inserting Voter Card and verifying precinct number and party affiliation (August only) with vote before placing receipt in brown envelope
- ☐ An election worker is collecting Voter Cards
- ☐ Payroll sheet (Attendance Roster) is complete and turned in
- ☐ Opening/Closing Report has been signed (use left column at bottom of page for morning – right column for evening)
- ☐ The red Official Ballot Bag is sealed and cabled to the Provisional Ballot table
- ☐ The Portable Provisional Booth is set up
- ☐ VIBS keypad is installed on a voting machine and earphones are positioned at encoder machine
- ☐ Supervising Judge knows how to complete the Mid Day Tally Sheet

PROCEDURAL CHECKS

- ☐ Remind the Supervising Judge that the Encoder PC Card should be left in the Encoder Machine
- ☐ Show the designated driver the Clear PC Card Bag and the number of PC Cards to return on the insert
- ☐ The designated driver and Supervising Judge both know the location of the drop-off site
- ☐ **REMIND SUPERVISING JUDGE TO REMOVE ALL PC CARDS FROM ALL VOTING MACHINES, PUT IN CLEAR PC CARD BAG, & GIVE TO DRIVER TO RETURN TO DROP-OFF SITE**

Signature of Supervising Judge: _____

Signature of Field Supervisor: _____

Election office web sites can handle large quantities of inquiries on Election Day and provide needed relief for staff and an overloaded telephone system. Providing voters the ability to verify their registration status and find their polling place is an excellent tool to include on your web site. This tool can also be linked to an Internet mapping service and can also provide necessary accessibility information regarding where the accessible entrance is located at each polling place in your jurisdiction (see Image 9.37).

Many jurisdictions also provide a tool on their web sites for voters to view and print a listing of races and questions that will appear on their ballot. This serves as an excellent voter education tool at little or no cost to the local jurisdiction.

Voter Education

Remember that public relations are a key component of managing elections. Your office must communicate on a regular basis with voters to confirm their registra-

tion status and to inform them of election dates and hours of operation.

A routine mailing of voter registration certificates can easily incorporate information about upcoming election dates. Informational brochures describing how to register to vote can also include details about absentee voting and vote center locations.

Partnering with your media representatives is a valuable tool for educating the public about elections and the voting process. Any change in polling places must be communicated to the voters and the general public. Utilize mailings, press releases, and your office web site to be sure that everyone is informed. It is a good practice to also post a notice at the old polling place location informing voters of their new polling place.

Most importantly, be sure to provide feedback and/or comment forms for use by the poll workers and the voters at all polling places and vote centers. Their suggestions are key components to managing a successful election.

SAMPLE FORM 9.37: SAMPLE WEB SITE POLLING PLACE LOCATOR (JOHNSON COUNTY, KS)

POLLING PLACE SUMMARY	
POLL LOCATION Wheatridge Middle School	VOTER INSTRUCTIONS Lobby. Disabled Entrance: Main Entrance
POLL ADDRESS 318 E Washington St Gardner, KS 66030	Show Map



CHAPTER 10

DEVELOPING AN AUDIT TRAIL

Introduction

Ensuring elections are administered fairly, accurately, transparently, and efficiently requires creating documentation of each component involved in the development and conduct of an election. These components include all pre-election, Election Day, and post-election activities; examples include, but are not limited to, candidate filing forms, voter registration lists, verification of voting systems, poll workers, etc. Documentation of these processes may also serve to prove the accuracy and validity of an election in a court of law and resolve questions regarding the integrity of the election.

Furthermore, developing a formal record (audit trail) of an election's components is an essential tool for election administrators to accurately evaluate the strengths and weaknesses of the processes established to conduct an election. It is therefore important to establish accurate methods and procedures for documenting and reviewing an election's audit trail. This chapter focuses on the documentation of election supplies, documents, and procedures. Audits of election results are discussed in a separate chapter.

In the business of election administration, there is no such thing as too much documentation. From job descriptions and written procedures, to workflow diagrams and charts, to timelines and checklists, the documentation that supports the conduct of an election can resolve questions regarding separation of duties, two person (opposite parties) integrity and chain of custody. It can also prove the accuracy of an election in a court of law.

By routinely collecting detailed documentation of each process, election officials are developing standards for achieving excellence in the management of elections. The collection of documentation (audit trail) is ongoing within election offices nationwide.

EXAMPLE Each voter record has its own unique audit trail. From the moment a citizen registers to vote in a jurisdiction, a record or file is created. Think of each voter's record as a legal file folder which contains the history of that voter—when they registered to vote; when they changed their address and/or their party affiliation; whether they voted absentee or early, in-person or by mail and at which location; their voter history and if they voted a provisional ballot, whether that ballot was counted or not; whether they have run for office; whether they were elected to office and for what position, whether they have served as a poll worker and if so, at which polling place and in what position, etc. All of this information and more is contained in each voter's record (audit trail). Therefore, the voter record audit trail is an important tool for determining a voter's eligibility to vote, and provides documentation for processing and qualifying provisional ballots.

The above example is just one of many processes within an election office that requires the development, maintenance and archiving of documentation (audit trail).

Types of Documentation

By reviewing and analyzing all paperwork mailed in, delivered at the front counter, generated by staff, processed by poll workers, and collected from outside sources (e.g. Secretary of State office, county and city agencies, vendors, etc.), election officials can start the process of determining the retention cycle for election-related documentation.

This documentation, i.e. records/audit trail, represents the records of the business of elections. Whether each record or document is of short-term, long-term, or archival value, it contains useful and sometimes essential information. Think of each document managed

in your office as your office's official documentation—it can contain legally binding decisions, ranging from contracts, purchase agreements, to voted paper ballots. Consideration must also be given to storage requirements and methods for retaining documents. Space issues are dependent upon whether the documentation is stored electronically or on paper.

These records also reflect the memory of your office—how many voters were registered ten years ago compared to today; what type of voting system was used then and now; what was the cost of managing elections then compared to now? Records in an election office document a citizen's most important right—their right to vote.

Government agencies also have a responsibility to comply with open records rules and regulations. Documents involved in the election administration audit trail may be subject to State and/or local Open Records Request or Freedom of Information laws. It is through the availability of information that the general public can develop an understanding of the administration of elections, and perhaps become more involved in the democratic process.

Documentation, records (audit trails) can be categorized as follows:

- ★ Nonessential/inactive records—documents that are routine and would be discarded within a designated period of time. Examples would include routine correspondence and memorandums, etc.
- ★ Active records—those that are mandated by Federal and /or State law to be retained for a specific period of time. Examples would include signed contracts, voted ballots, candidate filing forms, etc.
- ★ Archival records—documents that are stored on a permanent basis. Examples include voting district maps, voter registration records, etc.

Each of the above categories is regulated by local, State and Federal records retention laws. Election officials are encouraged to verify these retention requirements prior to developing your office records retention policies and procedures.

Examples of types of documentation managed within an election office include, but are not limited to:

- ★ Candidate filing forms
- ★ District and precinct boundary maps
- ★ Voter registration applications

- ★ Absentee ballot applications
- ★ Publications and legal notices
- ★ Equipment inventory and acceptance testing forms
- ★ Ballots
- ★ Logic and accuracy testing documentation
- ★ Equipment and supply checklists
- ★ Poll worker training materials
- ★ Poll worker assignment forms and oath of office
- ★ Employee timesheets and payroll documentation
- ★ Election Day opening and closing certifications
- ★ Post-election reconciliation forms

Pre-Election Audit Trail

The beginning of a new election cycle is a unique opportunity to catalog the types of documents that are generated from beginning to end. Begin by assigning a core group of full time staff the task of developing a master checklist containing every document that is collected, generated, or created during the pre-election/set up of an election. If such a checklist already exists, continue to evaluate and re-evaluate the items on the checklist and add new documents as needed.

An added benefit is that you are empowering a team of employees to develop a thorough understanding of all components involved in managing an election. The end result is a cross-trained team of employees, who are collecting the internal documentation, which also becomes the checklist and/or timeline for managing elections in your office. When completed, your office will have developed a checklist of permanent and archival election records required for each election. As these documents/records are approved and authorized, they can be stored in consecutive order for storage. Should the need arise, your office will be prepared and ready to provide all legal documents, should they be requested.

REMEMBER ★ ★ ★

Before you begin—remember—there is no such thing as too much documentation!!

Each election begins with a specific number of races and/or questions. The first deadline is the filing deadline. This date becomes the first date on your timeline and also represents the beginning of docu-

mentation that creates the election.

Before the election can be set up in your election management and/or voter registration software, you must reaffirm and validate that all precincts and districts are correct and that addresses are correctly assigned to their unique districts/precincts. It is important to understand the overall management of your voter registration software, i.e. who has authority to update precincts and districts and who manages updating the address file within the software. Confirm with your database administrator how user rights are assigned and develop a general understanding about which fields in your voter registration software are “locked” and require “administrative rights” for managing the data. Ask questions such as:

- ★ When are new addresses added to the system? Are they added when a new subdivision is platted or after the new home building occupancy permit has been issued? If addresses are added before the building is constructed, there is an opportunity for a voter to be added to an address that is actually an empty lot.
- ★ Does your address file contain only residential addresses? Do you have addresses that are post office repositories flagged in your system? Based on your State law, confirm that voters are assigned to residential addresses only.
- ★ Are certain precincts in your jurisdiction split by local school or special district boundaries? Remember that these “split precincts” can cause voter confusion on Election Day. Neighbors in the same precinct could be voting on different school races and/or questions if the precinct is split by school boundaries.

If possible, print a listing of precincts and associated districts prior to the set up of each election. A team of two staff members should proof this listing, using district maps for comparison purposes. If your office maintains GIS mapping software, merge the precincts/districts maintained in your voter registration software with the GIS mapping software to visually verify that all precincts are assigned to the correct districts. By utilizing a map point assigned to each residential address, you have the ability to visually verify that every residential address within your voter registration software is assigned to the correct precinct. In summary:

- ★ Confirm that addresses are assigned to the correct precinct and/or split precinct, then
- ★ Confirm that the precincts are assigned to the correct districts; and finally
- ★ Confirm that the correct districts are set up correctly for each election.

The next components of the pre-election audit trail are the candidate filing forms and/or questions submitted for the ballot. Based on State law, the candidate filing forms for each race must meet certain requirements to qualify for placement on the ballot. Therefore, each form becomes a part of the records for each election. The candidate filing forms and any questions certified for the ballot are the official documents that are used to set up the election. The original filing forms are also the documents that all data entry is proofed back to. Make a listing of all documents that are generated from the original candidate and question filing forms. This listing may include:

- ★ Election set up/ballot generation software candidate report
- ★ Legal candidate publications
- ★ Candidate listing for public distribution
- ★ Web site candidate information

Each document, if created by a different staff person or different software, must be handled and proofed back to the original filing forms. This proofing documentation audit trail for each election should be initialed by two staff members. The proofing team must be staff members who were not involved in creating the initial documents or doing the data entry.

Once the addresses, precincts, and districts have been verified and proofed; the candidate and question filing forms have been processed and all associated documentation and data entry has been proofed; the next step is the development of unique ballot styles.

NOTE Refer to State law for specific ballot requirements (e.g. rotation of candidate names, partisan and/or straight party ballots, etc.).

After the initial ballot styles have been generated, they should be proofed back to the precinct/district printout and the original candidate/question filing forms. A team of staff members not involved in the data entry of the election/ballot generation software proofs and signs off on the official ballot

file. The proofed ballot deck becomes a part of the pre-election audit trail.

Once the ballot proofs are returned from the printer, they are once again re-proofed back to the official proofed ballot deck which is already a component of the audit trail.

IMPORTANT At each point of the proofing and archiving of the pre-election audit trail, it is imperative that ballot generation and voter registration software be backed up and stored off-site. Each of these steps marks a “lock down” point in the preparation of an election.

Once ballots are received from the printer, staff must verify and confirm that the requested number of each ballot style has been received. Again, this document becomes a part of the audit trail, and becomes the control for managing distribution of the printed ballot stock.

Depending upon the type of voting system used, the tabulation software must generate memory cartridges for use in optical scan or voting machines. Logic and accuracy testing is performed to confirm the accuracy of the election setup. All checklists and printouts relating to the logic and accuracy testing are key components of the pre-election audit trail. Examples of the logic and accuracy trail include:

- ★ Opening L&A zero proofs from all voting equipment and optical scanners
- ★ Logic and accuracy marked ballot decks and associated documentation
- ★ Checklists generated for each piece of voting equipment
- ★ Closing L&A total proofs form all equipment and scanners
- ★ Final L&A results report

All of the above documentation should be proofed and initialed by at least two staff persons, or others as required by State law, and stored as part of the pre-election logic and accuracy audit trail.

Absentee and Early Voting Audit Trail

Based on State law, early voting jurisdictions must be prepared to process voters prior to Election Day. In some instances, voters are allowed to vote either in-person or by mail; and in other jurisdictions, voters

are only allowed to vote early based on special requirements/circumstances, i.e. disabled and/or out of the jurisdiction on Election Day.

Regardless of the State and local laws and requirements, early voting documentation becomes another component of the audit trail for each election.

Early voting/absentee voting by mail usually begins with an application form, completed by the voter. Based on State law, these forms must be submitted within the designated time frame. Each form should be date stamped for processing. Again, based on State law, there may be requirements on when the ballot must be sent after the application is received in your office. There may be other requirements regarding how the application for the ballot may be received by your office, and who may turn in the application for a ballot. All of these unique laws set the stage for internal policies and procedures for managing the documentation (application forms). These forms, in turn, become a part of the official audit trail for each election.

The requests for absentee ballots must be data entered and are used to validate the voter's right to receive a ballot. The voter registration software is the key control for managing the voter's eligibility to receive and/or request an absentee ballot. Once issued, the voter registration software becomes the control for managing that voter's ability to only vote once in that election.

One example that must be monitored as a part of the audit trail is a voter's request for a replacement ballot. Questions to ask your database administrator include:

- ★ If the voter has already been issued a ballot for that election, how does your software control the issuance of replacement ballots?
- ★ Which ballot can be counted when it is returned? What happens if the original ballot is returned and the replacement ballot? Which ballot is counted?
- ★ How are user rights restricted for issuance of absentee ballots? Is the data field “locked down”? If a user has a data entry error, how is the error corrected?

These questions are important because each cycle of ballot requests processed will generate a subsequent set of printed ballot envelopes and/or labels. Each of

tip

Consider printing an alphabetical listing of applications processed to be a part of your audit trail.

these print “jobs” should be balanced back to the number of absentee application data entered to verify that ballots requested equals ballot envelopes printed.

If ballot envelopes are stuffed by hand, a team of two people should verify that the correct ballot style has been inserted in each envelope. The envelopes should be processed in groups, representing a print “job” that has already been balanced to the number of applications data entered.

After each group of ballot envelopes has been sealed, the total number should once again be confirmed and balanced back to the initial number proofed from the initial print “job.”

Applications Processed = Envelopes/Labels Printed = Envelopes Stuffed and Sealed = Total Envelopes Delivered to the Post Office on Each Day.

The daily log of print jobs, initialed by different staff members, represents another key component of the absentee and early voting audit trail.

The returned ballot audit trail should be managed in the same fashion as the outgoing ballot audit trail.

tip

Train your staff to think of each returned ballot envelope as a dollar bill—they must be counted individually, sorted, bundled, and balanced at the end of each day.

Again, the voter registration software contains the history of all returned ballot envelopes. Once the voter’s record has indicated a ballot has been returned, that voter cannot vote again in that election. It is critical to understand user rights to the software and to confirm that the voter history data fields are in fact “locked down”. Any need to correct a user’s mistake in recording voter history must be documented and signed off by at least two administrative staff members.

All ballot envelopes returned must be stored in a secure, controlled environment with restricted access. Log sheets, computer or hand generated, must be created and updated on a daily basis. Returned ballot envelopes should be bundled in batches and recorded on a log sheet. This process assures that all batches have been accounted for and processed at the end of the election.

The final audit trail for absentee and early voting should support and validate that:

- ★ Total number of ballot envelopes returned = the total voters with voter history recorded
- ★ Total ballot envelopes returned MINUS ballots challenged = ballot envelopes authorized to be opened
- ★ Total ballot envelopes authorized to be opened = total ballots scanned for unofficial results
- ★ PLUS total number of provisional/challenged ballots MINUS total number of provisional/challenged ballots NOT authorized to be counted
- ★ EQUALS total number of all ballots scanned for official results

Each step of the outgoing and incoming absentee/early voting audit trail should be recorded, balanced and initialed by two staff members.

REMEMBER ★ ★ ★

All “dollar bills” returned must be counted, balanced, and tabulated. The audit logs become the official documentation for each election.

Polling Place Supplies and Equipment Audit Trail

Preparing for voting on Election Day at polling places located throughout your jurisdiction requires paperwork to support and verify that the proper supplies and equipment has been prepared and distributed to the correct polling place location.

Preparation of supplies is done in a variety of ways throughout the country. Generic Election Day supplies are often pre-packaged for distribution to polling places and are often locked, sealed and delivered with equipment prior to Election Day. Other offices may distribute all supplies and equipment to supervisory poll workers whose job includes verifying the supplies and bringing them to the polling place on Election morning. Other offices may deliver some supplies and equipment; and distribute other unique election supplies to the supervisory poll workers on the day prior to Election Day.

Regardless of the distribution method, packaging of supplies is a critical component for success on Election Day. Imagine an Election Day where different supplies are missing from different supply bags at polling places all over your jurisdiction. From managing the phone calls from frustrated poll workers... to dispatching missing supplies to polling places all

over the county, a routine election can quickly turn into a disaster.

Each polling place supply kit/bag should be packaged according to a supply checklist. Each bag and checklist should be numbered. The contents of the bag should be itemized and proofed and the checklist signed off by two staff members. Mission critical supplies, i.e. paper ballots and voter registration lists, should be proofed by key administrative staff. Each of these supply bag checklists becomes part of the election audit trail.

NOTE If you receive calls reporting missing supplies, you can quickly refer to the supply checklists to determine who was responsible for packaging that supply bag.

Voting equipment checklists and delivery sheets, including the serial number for each machine, protective counter numbers, and any tamper-evident seals and/or tamper resistant tape numbers should be recorded and confirmed by staff, by delivery staff, and again by the poll workers on Election morning.

On Election morning, protective and public counter numbers of all equipment should be verified by poll workers. The opening zero tape printout should be signed by poll workers. All of these documents begin to build the audit trail for each polling place on Election Day.

Field technicians/rovers can serve as additional verifiers on Election Day. By completing a polling place operational checklist, the rover and supervisory poll workers can both sign and confirm that each polling place has been set up according to diagram layouts and operational procedures.

Throughout the day, poll workers can complete verification reports to confirm that the number of voters checked in equals the number of ballots issued and the number of ballots scanned or recorded on public counters on all voting equipment.

When the polls close, closing verification forms are completed by poll workers, documenting the protective and public counter numbers on all voting equipment, and all tamper-evident seals and tape securing the equipment. The end of day result tapes are printed from each voting machine and signed by poll workers. These total votes collected from all voting machines should balance to the number of total voters processed at each polling place.

Post-Election Audit

Once all ballots have been scanned and all voting machine cartridges have been returned and unofficial results reported, your office should secure all supplies and documentation from each polling place.

NOTE A post election audit can be accomplished in many different ways, and is often required based on specific State law. A separate Election Management chapter has been developed to discuss recounts and random auditing of election results. This chapter will address auditing of supplies, documents, and procedures.

The purpose of conducting a post-election audit of supplies and documentation is two fold:

- ★ First, you want to ensure that all supplies have been accounted for and returned from each polling place.

tip

Bar code technology provides simply inventory control for equipment and mission-critical supplies.

- ★ Second, you need to audit the work completed by the poll workers to verify that all paperwork has been completed correctly.

tip

Consider providing an incentive program to encourage poll workers to return all supplies and properly complete all paperwork.

If possible, consider utilizing other county staff members to assist your office in accomplishing the post-election audit. Assign the staff to work in teams of two, with each team assigned a separate work area and table. A checklist of all supplies to be accounted for should be prepared for each polling place supply bag/kit. (Examples of checklists are included at the end of this chapter.) In order to streamline the audit, develop the teams to work in an assembly-line fashion. An example of the way to organize the teams is as follows:

- ★ The first team uses a checklist to locate specific supplies, and hands them to the second team. Team one continues to process all remaining supplies.
- ★ Team two locates any provisional ballots and hands them to team three. Team two continues to utilize their checklist and verify that all forms are accounted for and completed correctly.
- ★ Team three counts all provisional ballot envelopes and balances the number to the signature roster for each polling place. The provisional ballot envelopes are then forwarded to a review team for research.

When all forms and supplies have been accounted for, finalize the post-election audit by organizing and filing all documents in the same order for each polling place. These documents should be stored, sealed and archived according to State law.

SAMPLE FORM 10.1: POST-ELECTION SUMMARY SHEET REPORT (Allen County, OH)

ALLEN COUNTY BOARD OF ELECTIONS		
Election Date	Precinct	
Summary Sheet Report		
	Correct	Comments
Ballots Received		
Total Ballots Counted		
Provisional Ballots		
17 Yr Old Ballots		
Unprocessed Ballots		
Soiled Ballots		
Ballots Issued		
Line 1-5 Math		
Ballots Used from Pad		
Line 6/7 Match		
Signatures		

Summary Sheet Excellent Good Fair Checked By _____

SAMPLE FORM 10.2: POST-ELECTION POLL BOOK REPORT (Allen County, OH)

ALLEN COUNTY BOARD OF ELECTIONS		
Election Date	Precinct	
Poll Book Report		
	Correct	Comments
Oath Signed		
Certification signed		
Signature		
Address		
Votes Cast		
Stub Numbers		
Provisional		
Yellow Last Page		
Highlighter		
Absentee		
MISC		

Summary Book Excellent Good Fair Checked By _____



CHAPTER 11

CONTINGENCY PLANNING AND CHANGE MANAGEMENT

Introduction

Change in a voter registration and elections office is inevitable, and effective management requires election administrators to develop contingency and change management plans to respond to situations in a timely and effective manner. The goal of this chapter is to provide election officials general guidelines on how to identify, assess, and respond to events that may disrupt election and voter registration services in their local jurisdictions. The chapter addresses both contingency planning and change management as they are inextricably linked to each other and may at times be developed concurrently with each other. The goal of both these management plans is to prevent or minimize the impact of change (expected or unexpected) on election and voter registration processes, while preserving the integrity of the electoral system. The recommendations contained in this chapter should be vetted with Federal, State, and local laws, regulations, and relevant case law to ensure they are properly and lawfully implemented; election officials should contact their State officials when there is a question as to whether a practice is permitted or prohibited under State law.

For purposes of this discussion, contingency planning refers to the development of a management plan that addresses an election office's response to emergency and crisis situations that might arise unexpectedly. Examples of contingencies include, but are not limited to, natural disasters (e.g. earthquakes, severe snow and rain storms, fires, etc.), technology disasters (e.g. power outages), political and social events (e.g. war, civil unrest, medical emergencies, etc.), and election-related emergencies (e.g. lack of poll workers or polling places, shortage of ballots or voting systems, charges of voter intimidation, etc.). Change management, on the other hand, refers to how an election office handles situations that impact how the office functions in its capacity as an election and voter

registration agency; for example: changes in Federal and State laws, budget fluctuations, relocation of election office, staffing changes, agency reorganization, etc. Unlike contingencies, change management focuses on events the office is already aware of and do not rise unexpectedly.

Identifying and assessing contingencies and change factors

The first step in developing contingency and change management plans is to identify the contingencies and change factors that can impact election and voter registration practices and procedures in your particular community. This process is useful for several reasons. First, it will help you define the goal of either your contingency or change management plans. Second, it will help you to objectively assess situations and their potential impact. Finally, it provides the framework for developing and prioritizing the actions required to address a given situation.

To ensure a thorough evaluation, approach the identification and assessment process from a group perspective; for example, incorporate these topics into staff meetings or conduct regularly scheduled meetings to review existing policies and procedures. For contingency planning sessions, have the election office staff members come up with a list of worst case scenarios. Do not limit worst case scenarios to just Election Day situations; ask staff to also include contingencies that can occur during both pre and post election timeframes. Try to identify every possible irregularity that can occur in your jurisdiction. When brainstorming about change factors, consider both internal and external sources of change. For example, an internal source could be a change in staff and an external source can be a change in State law that affects current policies and practices.

tip

CHANGE MANAGEMENT TIP: Do not wait for situations to come up before you address them. Be proactive and learn to regularly evaluate the need for change; involve staff, election workers, and other stakeholders in this process.

tip

CONTINGENCY PLANNING TIP: Do not wait for situations to come up before you address them. Be proactive and learn to regularly identify and assess contingencies; involve staff, election workers, and other stakeholders in this process.

Table 11.1 lists several examples of possible contingencies and change factors; review the list and see what other examples you can think of for each category. In addition, when you list the contingencies and change factors, begin to think of them as “goals.” A goal is the general end result you would like a contingency or change management plan to achieve. It conveys the message in general, broad terms and does not specify strategies or outcomes. This will begin to provide the framework for developing your contingency and change management plans. For example:

Contingency = fire in voting system warehouse one week before Election Day

Goal = prevent fires in voting system warehouse and mitigate impact of fires on warehouse and voting system equipment

Change factor = election office is relocated

Goal = ensure all office functions continue to operate smoothly during relocation process

Once you have identified all contingencies and change factors, proceed with assessing the magnitude of impact these events can have on your office and the election and voter registration processes. This will help uncover vulnerabilities in the current system and assist in developing contingency and change management plans that may prevent an event from occurring or mitigate its impact.

To ensure consistency in the assessment process, establish basic criteria for the magnitude of impact for each contingency or change factor. A basic format to follow initially would be to use “low impact,” “medium impact,” and “high impact” categories, and for each of these levels develop an explanation or definition of what each one entails. For example:

- ★ **LOW** = *impact of event does not significantly disrupt the election process; does not require significant resources (internal or external); does not require immediate attention; does not require revision of existing policies or procedures*
- ★ **MEDIUM** = *requires attention of the election office; response needed within a reasonable timeframe; can be handled internally or with minimal external resources; may require revision of existing policies or procedures*
- ★ **HIGH** = *event causes a state of emergency; requires immediate attention; threatens the integrity of the election process; significant resources required, both internal and external; requires revision of existing policies or procedures*

TABLE 11.1: EXAMPLES OF CONTINGENCIES AND CHANGE FACTORS

Contingencies	Change Factors
Fire in voting system warehouse	Election office is relocated
Severe snow storm (blizzard) on Election Day	Reduction in number of staff members
Electrical damage to office computers during peak voter registration weeks prior to election	Purchase of new voting system
Poll workers do not show up at their assigned polling place	New State law requires poll workers receive 8 hours of training prior to an election
Polling place runs out of provisional ballots	Office budget is reduced by 7%

The above model is generic and meant to serve as a source of ideas for how to assess the level of impact changes can have in elections.¹ However, using this model as an example, one can begin to understand the level of risk a contingency poses to an election office and how a change factor may impact the current environment. Most contingencies will fall in the medium to high categories by their nature, while change factors can vary from low to high. In order to determine the level of impact, begin by asking questions to clarify the situation (Table 11.2) and then determine the level of impact. These will also become the building blocks for the action steps you develop later in your contingency plan.

In contingency planning there is an additional step in the assessment process that needs to be taken into account – determining the likelihood of an

event happening. For example, if earthquakes are listed as a contingency one would need to evaluate the probability of such an event occurring in one's local jurisdiction. If the jurisdiction has no history of earthquakes, then the likelihood of the event is low and the priority for developing a contingency plan would rank low as well. However, if the jurisdiction does have a history of earthquakes then a contingency plan for such an event would be considered a high priority. Determining the likelihood of an event is important because it helps agencies prioritize contingencies and the resources they require.

Following the example for assessing the magnitude of impact, develop definitions for the likelihood of an event occurring. We have used the “low,” “medium,” and “high” categories once more to simplify the process:

TABLE 11.2: ASSESSING MAGNITUDE OF IMPACT

Contingencies	Factors to Consider	Magnitude of Impact
Fire in voting system warehouse	What was the extent of the damage? How many voting systems are not functional as a result of the fire? What backup systems do we have that can be immediately put on the field?	Medium to High
Severe snow storm (blizzard) on Election Day	How accessible are the roads leading to the polling places? How long will the severe weather last? Can polling places be relocated to more accessible locations? Has a state of emergency been declared by the State?	High
Change Factors	Factors to Consider	Magnitude of Impact
Election office is relocated	Is the new facility accessible by public transportation? Is the space small, large, or the same in size to the previous location? Where and how will supplies be stored?	Low to Medium
Reduction in number of staff members	Is the reduction permanent? How will responsibilities be divided among the remaining staff?	Low to Medium

¹ The concepts for “magnitude of impact” and “likelihood of event” are modeled on risk assessment strategies found in the National Institute of Standards and Technology’s Risk Management Guide for Information Technology Systems (special publication 800-30). See Resources section at the end of this chapter for full citation.

- ★ **LOW** = likelihood of event occurring is low, threat is negligible; policies and procedures are in place to prevent the event or mitigate the magnitude of impact
- ★ **MEDIUM** = likelihood of event is likely but uncertain; policies and procedures are in place that may prevent the event or mitigate the magnitude of the impact
- ★ **HIGH** = event is highly probable; policies and procedure are not in place to prevent the event or mitigate the magnitude of impact

tip

Another tool you can use during the identification and assessment process to supplement (not replace) the evaluation, in either contingency or change management planning, is to conduct an analysis of the Strengths, Weaknesses, Opportunities, and Threats (S.W.O.T. analysis) that can assist or impede the successful development and implementation of the identified change or contingency plan. A sample S.W.O.T. analysis worksheet can be found at the end of this chapter.

For example:

Contingency	Likelihood	Factors to consider	Magnitude of impact
Polling place runs out of provisional ballots	Medium	Voter turnout is not predictable; evaluate public interest in contests and issues on the ballots; availability of backup provisional ballots; time it takes to deliver new supply of ballots to each polling place	Medium to High

Identifying and assessing the contingencies and change factors that can or will impact your election office are the initial steps required to develop sound contingency and change management plans. They provide the foundation for determining the resources and plan of actions required to address situations in a timely and effective manner. The following two sections will separately address how to develop and implement contingency and change management plans for your election office, and they will address some of the ideas already explored in this chapter.

Developing and implementing contingency plans

The following five steps describe the general process for developing and implementing a contingency plan:

1. Set a goal
2. Define the purpose
3. Specify objectives
4. Develop an action plan
5. Implement action plan

1. Set a goal

In the previous section of this chapter, the concept of developing a goal was briefly mentioned. The following example was given:

- ★ **Contingency** = fire in voting system warehouse
- ★ **Goals** = prevent fires in voting system warehouse and mitigate impact of fires on warehouse and voting system equipment

As you can see, a goal is the general end result you would like a contingency plan to achieve. It conveys the message in general, broad terms and does not specify strategies or outcomes. In addition, the goal of the contingency plan should be in alignment with the overall mission and goal(s) of the agency. In other words, the outcome(s) of the contingency plan help support and achieve the agency's strategic plan.² It is also important to note that agencies may develop a strategic plan for their contingency planning program in general, which would include its own goal(s) and objectives. If so, contingency-specific plans would help support and achieve the mission and goal(s) of both the program and the agency's strategic plans.

Some examples of a contingency planning program's goals could be:

- ★ To provide prompt and effective responses to emergencies and crisis situations while preserving the integrity, transparency, and accessibility of the election process.
- ★ The prevention or minimization of any interruption in the election processes during emergency and crisis situations.
- ★ To ensure rapid and complete recovery of the election processes to normal conditions following emergencies/disasters.
- ★ Serve as a model agency in the area of emergency and crisis recovery.

Here is another example of a goal for a contingency-specific plan:

- ★ **Contingency** = poll workers do not show up at their assigned polling place
- ★ **Goal** = ensure polling places are fully staffed throughout Election Day

2. Define the purpose

Now that you have set a general goal, define the purpose of the contingency plan. The purpose refers to the scope (i.e. parameters, authority) of the contingency plan. It gives the plan a specific framework in which to operate, giving it focus. For example:

- ★ **Contingency** = fire in voting system warehouse
- ★ **Goals** = prevent fires in voting system warehouse and mitigate impact of fires on warehouse and voting system equipment

² Strategic planning refers to the process of comprehensive, integrative program planning that considers, at a minimum, the future of current decisions, overall policy, organizational development, and links to operational plans. [Definition from the Center for Program Evaluation, which is part of the Bureau of Justice Assistance of the U.S. Department of Justice's Office of Justice Programs - <http://www.ojp.usdoj.gov/BJA/evaluation/index.html>].

In addition, the U.S. General Accounting Office (GAO) states that strategic plans "are intended to be the starting point for each agency's performance measurement efforts. Each plan must include a comprehensive mission statement based on the agency's statutory requirements, a set of outcome-related strategic goals, and a description of how the agency intends to achieve these goals. The mission statement brings the agency into focus. It explains why the agency exists, tells what it does, and describes how it does it. The strategic goals that follow are an outgrowth of this clearly stated mission. The strategic goals explain the purposes of the agency's programs and the results they are intended to achieve." [GAO. Executive Guide: Effectively Implementing the Government Performance and Results Act. June 1996. <http://www.gao.gov/special.pubs/gg96118.pdf>]

- ★ **Purpose of contingency plan** = establish policies and procedures for preventing and mitigating the effects of fire on the voting system warehouse through proper fire safety practices and community collaboration

As you may note in the example above, the purpose focuses the plan on fires that occur only in the voting system warehouse; fires that occur in other places (e.g. other storage facilities, polling places, election office, etc) fall outside the scope of this contingency plan. The latter would have to be addressed in a separate contingency plan.

3. Specify objectives

Objectives refer to the specific outcomes that support and help achieve the goal(s) of the contingency plan; these should be clear, measurable, achievable, realistic, and be time-bound.

Here are some examples of possible objectives for the example we have been using regarding fires in the voting system warehouse:

- ★ **Contingency** = fire in voting system warehouse
- ★ **Goals** = prevent fires in voting system warehouse and mitigate impact of fires on warehouse and voting system equipment
- ★ **Purpose of contingency plan** = establish policies and procedures for preventing and mitigating the effects of fire on the voting system warehouse through proper fire safety practices and community collaboration
- ★ **Objectives:**
 1. reduce probability of fire occurrence at least 50% by the next scheduled State/local election
 2. ensure smoke detectors are operational 100% of the time
 3. ensure sprinkler system is operational 100% of the time
 4. mitigate impact of fires on voting system equipment
 5. develop fire safety measures in collaboration with local firemen and police
 6. have backup voting system in case fire destroys equipment in warehouse
 7. establish policies and procedures for conducting an election with the backup voting system

8. train staff and poll workers in both regular and backup voting systems

4. Develop an action plan

You have defined the goal, purpose, and objectives of the contingency plan – now, turn that information into an action plan. The action plan should speak to the goal and objectives you have established; each action step should relate back to a particular objective(s). The plan should also define the staff, budget, time, training needs, and resources needed to accomplish the tasks and achieve the goal. Not all action plans will look the same, some will be more complex than others according to the needs of the particular contingency being considered. In addition, if you have not brought in staff and/or outside resources to participate in the contingency planning process up to this point this is the time to do so. Establishing community partners is essential to the success of many contingency plans. The role of taskforces and community groups is discussed more in depth in Discussion Box 11.4, “Community Collaborations.”

Example:

★ **Contingency** = fire in voting system warehouse

★ **Goals** = prevent fires in voting system warehouse and mitigate impact of fires on warehouse and voting system equipment

★ **Purpose of contingency plan** = establish policies and procedures for preventing and mitigating the effects of fire on the voting system warehouse through proper fire safety practices and community collaboration

★ **Objectives:**

1. reduce probability of fire occurrence at least 50% by the next scheduled State/local election
2. ensure smoke detectors are operational 100% of the time
3. ensure sprinkler system is operational 100% of the time
4. mitigate impact of fires on voting system equipment
5. develop fire safety measures in collaboration with local firemen and police
6. have backup voting system in case fire destroys equipment in warehouse

7. establish policies and procedures for conducting an election with the backup voting system

8. train staff and poll workers in both regular and backup voting systems

★ **Action steps:**

1. within 15 days of adoption of the contingency plan, meet with local fire department to assess safety of warehouse and develop policies and procedures for preventing and reducing incidents of fire and the damage caused by them (*objective #5*)
2. install smoke detectors in warehouse within 15 days of adoption of the contingency plan (*objectives #1 and #2*)
3. schedule and conduct monthly visits to the warehouse to ensure smoke detectors are operational 100% of the time (*objectives #1 and #2*)
4. schedule and conduct monthly visits to the warehouse to ensure sprinkler system is operational 100% of the time (*objectives #1 and #3*)
5. monitor smoke detectors and sprinklers once a week during the last 30 days prior to a scheduled election (*objectives #1, #2, and #3*)
6. within 30 days of adoption of the contingency plan, cover voting equipment with nonflammable material during storage at warehouse to reduce impact of fire (*objective #4*)
7. within 30 days of adoption of the contingency plan, prevent sprinkler water damage by keeping voting equipment at least 12 inches off the warehouse floor (*objective #4*)
8. within 30 days of adoption of the contingency plan, designate backup facility to store voting system equipment in case current facility becomes unsafe as result of a fire (*objective #5*)

You may find it useful to display the action steps in the form of a table to help you visualize the information and present it to others (see Table 11.3).

TABLE 11.3: SAMPLE VISUAL REPRESENTATION OF ACTION STEPS

Objective: #2 = ensure smoke detectors are operational 100% of the time						
Action step	Timeline	Labor categories (Staff)	Labor units (staff time for this task)	Labor Cost	Other Costs	Specific activities
consult with local firemen to determine the number and location of smoke detectors required for warehouse	within 5 days of adoption of plan	Director	8 hours	\$20/hr	mileage to and from warehouse	contact local firemen, conduct site visit to warehouse (identify quantity, type, and placement), communicate findings to staff for purchase of smoke detectors
purchase smoke detectors	within 7 days of adoption of plan	Administrative Assistant	3 hours	\$12/hr	0	purchase smoke detectors per specifications, inspect and accept purchased smoke detectors, store smoke detectors until installation
install smoke detectors	within 15 days of adoption of the contingency plan	Director	4 hours	\$20/hr	mileage to and from warehouse	provide smoke detectors to technicians, provide placement instructions and other necessary information for installation, inspect and approve installation, maintain record of installation, train staff responsible for monitoring smoke detectors
		Technician (installer)	8 hours	\$50/hr	0	receive smoke detectors, install smoke detectors, ensure all smoke detectors are operational by end of installation
monitor smoke detectors and sprinklers once a week during the last 30 days prior to a scheduled election	once a week during the last 30 days prior to a scheduled election	2 Office Staff	not to exceed 2 hours per visit	\$14/hr	mileage to and from warehouse	warehouse site visit, perform evaluation of smoke detectors, record and communicate results of visit, replace nonfunctioning smoke detectors

continued next page...

TABLE 11.3 (cont.)

Objective: #2 = ensure smoke detectors are operational 100% of the time						
Action step	Timeline	Labor categories (Staff)	Labor units (staff time for this task)	Labor Cost	Other Costs	Specific activities
monitor smoke detectors and sprinklers once a week during the last 30 days prior to a scheduled election	once a week during the last 30 days prior to a scheduled election	2 Office Staff	not to exceed 2 hours per visit	\$14/hr	mileage to and from warehouse	warehouse site visit, perform evaluation of smoke detectors, record and communicate results of visit, replace nonfunctioning smoke detectors
schedule and conduct monthly visits to the warehouse to monitor smoke detectors during other times	monthly (other than the 30 days prior to an election)	2 Office Staff	not to exceed 2 hours per visit	\$14/hr	mileage to and from warehouse	warehouse site visit, perform evaluation of smoke detectors, record and communicate results of visit, replace nonfunctioning smoke detectors

tip

Contact your State and local Department of Emergency Preparedness and request copies of existing action plans and information on available resources. These plans and resources can provide the template for developing a specific operational plan as it relates to elections, including pre-election, early voting, Election Day, and post election activities.

Additional things to consider when developing the action plan:

Coordinate a team meeting with other election officials within your own State to work together to develop a State disaster/contingency plan for local election offices. Include the following team members:

- ★ Election officials from small, medium and large jurisdictions, including at least one jurisdiction that manages each type of voting system deployed within your State
- ★ State Election Director and staff members
- ★ State Emergency Preparedness Director and staff members

- ★ Representatives from local police and fire departments
- ★ Media and public relations outreach representatives
- ★ Political party representatives
- ★ Agencies and groups that conduct voter education and registration efforts
- ★ Representatives from elderly, disabled, and language minority groups should be included to ensure contingency plans are effectively communicated and implemented in regards to these groups
- ★ Legal staff/representatives from the election offices and other legal organizations vested in elections to ensure contingency plans are consistent with applicable Federal, State, and local laws

Review your State election code and regulations to determine how these guidelines and laws will regulate your actions.

EXAMPLE In some States the Secretary of State has the authority to declare an Election Day emergency, thus permitting your office to implement approved “emergency election procedures”.

Within your county, it is important to understand the chain of authority for local disasters. Contact your local Emergency Management Department to gather information on your countywide procedures, including powers and responsibilities of county officials, as well as procedures for managing media operations.

Once your State Plan has been drafted, each local election official should establish and meet with a local task force to include:

- ★ County department representatives
- ★ Area law enforcement and fire district agencies
- ★ Area school district representatives
- ★ Area utility staff members, etc.

The local area task force provides your office access to resources available throughout your jurisdiction in the event of an emergency. With their input and the assistance of your Emergency Management Director, begin by developing a chain of authority and decision tree, including a contact list of these individuals, with home and cell telephone numbers.

Throughout the development of your plan, consider the following questions:

- ★ Are there any gaps, overlaps, or other problem areas?
- ★ Is it detailed enough? Too detailed?
- ★ Does the Plan reflect lessons learned (from actual disasters or tests)?
- ★ Does the Plan reflect changes in the facilities or internal processes?
- ★ Have the types of situations changed?
- ★ Are names and phone numbers current?
- ★ Are disaster supplies stocked and ready for distribution?

tip

It is also strongly recommended that the Plan be tested on a regular basis – no less than twice a year. This helps all employees to become familiar with the procedures and reduces your risks in the event of an actual disaster.

5. Implement the plan

Now it is time to implement the action steps that you have laid out for your contingency plan. A key activity during the implementation of the plan is to EVALUATE. Once the plan has been implemented, it is important to assess how effective the action plan was and how it can be improved for the next time. It is useful to involve the staff and other teams of people involved in carrying out the steps of the action plan; they will be able to better tell you how the plan worked in actual practice. It is also as important to communicate the results of this assessment with your team and interested stakeholders; engaging them in the process will help them better understand the successes and challenges election officials face during moments of crisis.

Organizing Response Teams

A response team is comprised of designated individuals, and can include county management officials, election staff members, area police and fire staff, and specific polling place supervisors.

EXAMPLE A disaster response team is comparable to a volunteer Fire Department. The volunteer firemen are regular citizens with other jobs. They are trained as firemen and have a central meeting location (fire station), which contains all of their equipment. When a fire occurs, the alarm sounds and they leave their regular jobs, go to the central meeting location and perform firefighting duties until the fire is extinguished.

The duties of the response team can include:

- ★ Implement the procedures as detailed in the Disaster/Contingency Plan
- ★ Initiate the phone tree
- ★ Serve as a liaison between the response team, management, and other employees
- ★ Direct and supervise operations
- ★ Maintain and distribute disaster supplies, etc.

Each type of disaster/contingency plan should have its own unique response team. As an example, a shortage of provisional ballots in one area of the county would require the deployment of a pre-assigned team of runners who are trained to respond to specific polling places with additional ballots.

Community Collaborations

The success of a contingency plan does not rely solely on the internal resources the election office has. Many emergencies and crisis situations will require the election office to reach out to other agencies and groups in the community for assistance in managing the situation and ensuring interruptions to the election processes are prevented and/or minimized. As such, it is best to involve key stakeholders from the beginning, i.e. during the development phase of the contingency plan. There are many benefits to this, including:

- ★ They can be a resource of fresh and innovative ideas.
- ★ They can provide volunteers, materials, and services.
- ★ They can provide technical expertise in areas outside the scope of the election office's functions, knowledge, and capabilities.
- ★ It helps educate non-election staff about the roles and responsibilities of the election offices and its importance in the community.

Whom do you decide to involve? The response to this question will vary according to the particular issue being considered. A good way to identify stakeholders is to determine who will be impacted by the contingency plan – for example:

- ★ Staff from other county offices/department
- ★ Poll workers
- ★ Voters
- ★ Local police and fire departments
- ★ Emergency medical services
- ★ Representatives from groups serving the elderly, individuals with disabilities, and minority groups
- ★ Representatives from political parties
- ★ Voter education and outreach groups
- ★ Legal staff/representatives from the election offices and other legal organizations vested in elections
- ★ Staff from the State's election office
- ★ Other counties' election directors

These runners must be “on call” and be prepared to respond at a moment's notice. Supplies must be readied and may include polling place directional maps, names of polling place supervisors, official response team name tags, checklists, instructions, etc.

Organizational Planning for Catastrophic Disasters

A catastrophic disaster is an event that causes the cancellation and subsequent rescheduling of an election. This includes terrorist attacks such as the 9/11 attack in New York and natural disasters such as the Katrina hurricane in New Orleans.

- ★ Be sure to understand your State election law regarding declaration of emergencies, especially who has the authority to make decisions relating to the election process. Examples can include:
 - Closing and relocation of polling places
 - Consolidation of polling locations
 - Cancellation and rescheduling of an election
- ★ In your plan, be sure to establish a procedure for notifying all polling place supervisors that the election has been cancelled. Your action plan should also provide instructions on how to close the polling locations and return supplies. In the event that an election is cancelled, the Plan should also give guidance for the disposition of ballots and electronic media.

Creating a Media Action Plan

In order to protect and enhance the Election Office's credibility and to communicate effectively with the media, the election director should consider the following suggestions:

- ★ Designate an election staff member to be the central media contact person.
- ★ Instruct all employees to refer all questions from the media to the election director or to the County's Public Information Officer.
- ★ Educate your employees that news reporters are under constant deadlines, but no deadline is worth anyone releasing an inaccurate statement to the media.
- ★ Be aware that media reporters often frame their questions to bring out the conflict or emotion in a story.
- ★ Educate your polling place supervisors on proper ways to handle media questions.
- ★ Never allow anyone to provide a "personal" or "off the record" opinion to the media.
- ★ Press releases should be developed and disseminated in an expeditious fashion regarding changes in election times, polling place locations, expected release of election results, etc.
- ★ Be sure to take time to explain to the media and the public the nature of the emergency and all procedures as you work toward managing the issue. Perceived problems can be just as damaging as actual problems. Remember to provide thorough explanations. By taking the time to inform the public as things progress, an Election Day emergency, large or small, will be thought of and reported as a problem that you accurately and efficiently handled, not an Election Day disaster.
- ★ The designated election PIO staff should maintain a media contact list, including office and cell telephone numbers and email addresses for all first line media personnel.

- ★ It is important to provide a complete listing of polling places to all area law enforcement and firefighting personnel prior to every election. Through a designated response team, area police departments can implement increased patrols and/or place law enforcement officers at specific polling place locations should they deem it necessary in order to protect public safety and the integrity of the election process.

EXAMPLE Should the national threat level be increased to orange or red on Election Day, local area police and sheriff departments would immediately implement their response team procedures.

Contingency Planning for Unexpected Events during Early Voting

Early voting activities can include distribution of ballots by mail or voting in person at satellite locations prior to Election Day. As with all other election operations, any possible unexpected event during early

voting must be identified, an action plan developed, and staff trained on how to respond to the issue. Evaluate all aspects of the operation, from the moment the doors open, until they close.

NOTE Satellite early voting in-person locations are similar to polling places on Election Day. They are staffed by temporary staff, managed by a supervisor, and are open for voting during a designated period of time.

Following is a list of possible situations that can arise unexpectedly during the early voting period and some of the factors to consider when developing a contingency plan:

Computer network failure

- ★ If voters are processed on the main election software system, how will you check voters in if the computers stop working?
- ★ How will you verify their eligibility?
- ★ How will you know which ballot style to provide the voter?

Power outage

- ★ How will you process voters?
- ★ Do you have a UPS device or battery powered laptop for emergency use?

Staff shortage

- ★ Do you have designated staff identified to fill positions until replacement temporary staff can be recruited?

Ballot shortage

- ★ Do you have a temporary backup supply of all ballots on site at each location?
- ★ Are temporary staff members trained to call for additional ballots once they access the backup supply?

Long lines

- ★ Do you have a Plan B for managing large quantities of voters?
- ★ Are temporary staff members trained in line management procedures?

Incorrect ballot styles mailed to voters

- ★ How will you determine which voters received the wrong ballot?
- ★ What is your method for issuing replacement ballots?
- ★ How will your office respond to media questions?

Contingency Planning for Unexpected Events on Election Day

Unexpected events occur in every business operation, every day throughout the year. On Election Day, any unexpected event can have a significant impact, i.e. polling places don't open on time, poll workers don't report for work, mission critical supplies were

not delivered, road closures, power failure, etc. Each scenario must be evaluated, and an action plan developed, including the assignment of a response team for each type of unexpected event.

Following is a list of possible situations that can arise unexpectedly on Election Day and some of the factors to consider when developing a contingency plan:

Relocation or consolidation of polling places

- ★ Maintain a listing of all available polling place locations within your jurisdiction, along with contact person name and phone number.
- ★ Consider using satellite early voting locations as emergency polling places on Election Day. These locations usually have computer network lines in place to allow for any voter in the jurisdiction to be validated.
- ★ If it is necessary to relocate polling places at the last minute, be sure to post notices at the old location to inform voters of the location of the new polling place.
- ★ Notify the media of any polling place changes and remember to also post this information on your office web site.
- ★ Use your office automated telephone system to provide updated information to voters about last minute polling place changes.

Shortage of poll workers

- ★ As part of your normal operating procedures, assign a certain percentage of poll workers to a "stand by" status. Require that these poll workers report to the central election office instead of a polling place on Election morning. These poll workers can be deployed to any polling place in the county in the event of "no shows" or absences.
- ★ Implement a county/city employee "stand by" poll worker program. These employees should receive full training and be authorized for immediate re-assignment on Election Day, if needed.
- ★ If not needed at the polling places, utilize this pool of "stand by" poll workers to serve other needs on Election Day, i.e. runners, in-house telephone bank staff, etc.

Shortage of ballots and/or supplies

- ★ Poll workers should be trained to inspect their supply kits on the day before Election Day. They are the final set of eyes to determine if all mission critical supplies have been packaged correctly.
- ★ Provide a checklist of all mission critical supplies. Place this checklist on the top of their supply kit and train them to check this list immediately upon receipt of their supplies. If something is missing, poll workers must be trained to immediately telephone the central election office on the night prior to Election Day.
- ★ Be sure that your office has an action plan in place to monitor telephone calls from poll workers on the night before Election Day, and to dispatch response teams to deliver any missing supplies.

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Equipment issues

- ★ Provide poll workers with easy to follow, step by step instructions for opening and closing voting equipment. Make these instructions as simple as possible, placing the opening instructions on one side and the closing on the reverse side. Laminate this one page of instructions and place it in an easy to use location.

NOTE Consider attaching the laminated instructions to the handle of the voting equipment, making it easy to find on Election morning.

- ★ Maintain a support help desk to answer questions from poll workers regarding any problem they have with opening or closing the voting equipment. Be sure to document each call and use this information for future debriefing sessions.
- ★ Provide cell phones to all rovers in the field and establish an action plan to enable the central election office to know which rovers have been dispatched to which polling place locations.
- ★ Require the rovers to complete a daily log documenting their visits to assigned polling locations throughout the day.

Polling place not open

- ★ Provide the supervisory poll worker with current contact information for the manager of the facility they are assigned to on Election Day.
- ★ Train poll workers to immediately contact the facility manager by phone if the location is locked and they are not able to gain access. If they are not able to reach the facility manager, they should immediately contact the central election office for assistance.
- ★ In the event that access to the location is not available by the time that the polls are scheduled to open, poll workers should be trained on how to implement Plan B for processing voters until the building is opened.

NOTE Plan B can include utilizing the trunks of automobiles as check in locations for voters.

Inclement weather after the polls open

- ★ Develop an emergency action plan in the event that roads in your jurisdiction become either somewhat or completely impassable due to ice or snow.
- ★ Contact county/city employees to request use of four-wheel drive vehicles for use in collecting voting equipment and voted ballots from pre-established emergency collection sites or from individual polling place locations.
- ★ Utilize your established polling place notification plan to inform supervisory poll workers that the Election night emergency action plan is now in place.

NOTE Consider implementing a central text messaging service to provide immediate notification to all poll workers through their cell phone.

Bomb threat

- ★ Provide a "Bomb Threat Protocol" laminated card in all polling place supply kits. Instruct your poll workers to follow the guidelines on the card and to call 911 immediately.

Power failure at polling places

- ★ Include instructions on how to manage a power failure in your poll worker training program and manual. These instructions should be laminated and placed in an easy to find location in their Election Day supply kit.
- ★ Poll workers should be trained in how to calmly continue the voting process in the event of power failure.
- ★ Train your staff to establish and send a response team to these polling place locations. The response team should be prepared to transport needed supplies and equipment, i.e. food, water, space heaters, fans, etc.

Electioneering or protesting

- ★ Train poll workers on State law regarding electioneering at the polls on Election Day. Provide poll workers with simple solutions for dealing with this issue, i.e. request voters to remove campaign buttons or stickers from their clothing, conduct periodic visual checks outside the entrance of the polling place to check for campaign signs, etc.
- ★ If poll workers experience difficulty in managing electioneering activity, they should be trained to immediately call 911 to request police assistance.

Traffic control

- ★ Poll workers should be trained to be aware of potential traffic issues and be prepared to request police assistance, if necessary.

Long lines

- ★ In the event of long lines of voters, poll workers should be trained to follow the guidelines for line management in their training manual. Tip: Consider developing and incorporating line management guidelines into the poll worker training session and materials if you do not currently have one. Reach out to other community groups, agencies, and businesses that have experience coordinating and managing large events for their input on how they would manage a polling place.
- ★ Provide various scenarios as solutions to this issue, i.e. break up the line into two or more check in locations; station a poll worker at the end of the line to encourage voters to review the sample ballot and be prepared to vote in order to keep the line moving; confirm that voters are in the correct polling place location; and consider setting up a separate line to manage provisional voters.
- ★ Develop a plan for deploying additional personnel, voting equipment, and other supplies to polling places experiencing long lines.

TIP As a first step on Election Day, have poll workers and/or roaming technicians first explain the cause of the long lines before deploying resources; this will help you identify which personnel or materials need to be sent out or if the problem only requires a modification within the polling place.

Developing a Continuity of Operations Plan for Internal Operations

On Election Day, the central election office becomes the command post for all polling place activities throughout the jurisdiction. It is imperative to

review your internal continuity of operations plan with a mindset of “It’s now Election Day. What will we do if?” Consider every conceivable scenario from bomb threats to power outage to telephone malfunction. Ask yourself:

Power failure

- ★ What are the mission critical operations that will need electricity from an emergency source in the event of a power failure at your main office?
- ★ Do you have an emergency generator on stand-by on Election Day?
- ★ Do you have UPS devices connected to mission critical computer systems should the main power supply be interrupted for any reason?
- ★ Have you contacted your area utility companies to request that they limit work in your vicinity on Election Day?

Computer system issues

- ★ Who will you call if the main computer system crashes on Election morning?
- ★ How will you direct voters to the correct polling place without a computer available to lookup the information?
- ★ Do you have a county computer staff member on call to your office 24/7 during election mode?

Telephone system issues

- ★ How will you communicate to the polling places, the voters, and the media if the main telephone system malfunctions on Election morning?
- ★ Do you know which polling places have cell phones available to them?
- ★ Do you have access to all cell phones within the county organization?
- ★ Do you have a listing of personal cell phone numbers for your staff?
- ★ Have you collected cell phone numbers for your poll workers in the field?
- ★ Do your poll workers have an emergency contact phone number for their use on Election Day?
- ★ Have you made arrangements with your emergency dispatch department to manage phone calls in the event of an emergency?
- ★ Does your local phone company know where to reroute your calls in the event of an emergency?

Election night activities

- ★ Do you have an alternative location to tally votes on Election night?
- ★ Do you have a backup of all computer data both onsite in a fire proof safe and in an offsite secure location?

Election office needs

- ★ Do you have an alternative location for use as backup “main election office” on Election Day if your phone, computers and the overall facility become unusable for any reason?
- ★ Does your staff know where to report in order to answer the incoming phone calls?
- ★ Do you have an area designated for media in the alternative location? What about security needs?
- ★ Do you have a plan in place for police officers to provide extra services to your office?

tip

Document each of these scenarios and its specific action plan. Publish and distribute your office’s Internal Continuity of Operations Plan to all agencies responsible for providing assistance in the event of a disaster/emergency. You should also release the final Plan to all area television, radio, and newspaper media.

It is also recommended that there be a system and process for how poll workers and voters will communicate with the election office during the voting period in case of emergencies and other election-related events. For example: do you have dedicated telephone lines for poll workers, voters, media, etc; do you have the necessary telecommunications equipment and staffing to manage the phone lines; how have you communicated these numbers to each group; how will poll workers contact the office (agency issued cell phones, telephones already located on polling site, personal phones, etc.); etc.

Staff and Poll Worker Training and Supplies

Polling Places become mini-branch offices on Election Day. Each one is stand-alone and must be prepared to handle any situation that may arise. Many types of situations can occur during the day. Often poll workers face the challenge of managing electioneering activities, other types of protests, accidents and illnesses impacting poll workers and/or voters, traffic control needs, bomb threats, along with weather-related issues and supplies and equipment issues.

Specific Emergencies:

- ★ **Fire** – Poll workers should be trained to review the procedures for reporting fires and evacuating the

facility with their polling place facility manager. If possible, they should collect the designated election supplies prior to leaving the building.

- ★ **Medical** – For any medical emergencies, poll workers should be instructed to call 911 immediately, and to also report the emergency to the central election office.
- ★ **Tornado** – Poll workers should seek shelter immediately if a warning is issued for their area. They should follow instructions posted in the facility and go immediately to the designated shelter area. If no shelter area is available, they should seek shelter in an interior room that does not have windows.
- ★ **Flood** – In the event of flooding, poll workers should immediately notify the central election office and then move the polling place supplies and voting area to a higher location.

NOTE Include large garbage bags with each polling place’s supplies. In the event of heavy rain, they can be used to protect the ballot boxes and precinct supplies from moisture.

- ★ **Severe Ice/Snow Storm** – If poll workers are concerned about severe weather related to ice or snow, they should immediately notify the central election office.
- ★ **Power Failure** – Should the power fail at a polling place location, the poll workers should follow the instructions provided in their election supplies. They should also be trained to notify the central election office as soon as possible.

Other things to consider:

- ★ Full time election staff should be responsible for preparing and packaging all polling place supply kits. These kits should contain a checklist to be

signed by two staff members as a final proof that all supplies for each location are in place.

- ★ Develop a listing of all mission-critical polling place supplies. Again, this list should be double-proofed by two separate full time staff members prior to distribution to the poll workers.
- ★ On Election Day, poll workers should be trained to immediately notify the central election office in the event of an expected shortage of mission-critical supplies, i.e. provisional ballots, etc.
- ★ Runners should be available and a response team should be assigned to deliver additional supplies. The response team should be provided with driving maps and instructions on how to provide additional support to the poll workers. One member of the response team should have a cell phone to report back to election central when all supplies have been delivered.
- ★ Provide additional support to poll workers by assigning rovers to pre-established regions on Election Day. Each region should contain 7-10 polling places. The rovers should visit these locations before the polls open and immediately after the polls close to provide additional support and assistance to the poll workers.

RESOURCES

- Centers for Disease Control and Prevention – Emergency Preparedness and Response:
<http://emergency.cdc.gov/>
- Disability Preparedness Resource Center:
<http://www.disabilitypreparedness.gov/>
- Federal Emergency Management Agency:
<http://www.fema.gov/>
- Ready Campaign:
www.ready.gov
- List of State offices and agencies of emergency management:
<http://www.fema.gov/about/contact/statedr.shtm>
- Disaster Help:
<https://www.disasterhelp.gov/index.shtm>
- Making Community Emergency Preparedness and Response Programs Accessible to People with Disabilities:
<http://www.ada.gov/emergencyprep.htm>
- Stoneburner, Gary, Alice Goguen, and Alexis Feringa. *Risk Management Guide for Information Technology Systems, Recommendations of the National Institute of Standards and Technology* (Special publication 800-30). National Institute of Standards and Technology, Technology Administration, U.S. Department of Commerce. July 2002. (<http://csrc.nist.gov/publications/nistpubs/800-30/sp800-30.pdf>)
- U.S. Department of Homeland Security:
<http://www.dhs.gov/index.shtm>
- U.S. Department of the Interior – Emergency Management
(<http://www.doi.gov/emergency/index.html>)
- U.S. Department of Justice, Americans with Disability Act:
<http://www.usdoj.gov/crt/ada/adahom1.htm>
- *An ADA Guide for Local Governments: Making Community Emergency Preparedness and Response Programs Accessible to People with Disabilities*. (An 11-page illustrated publication that provides guidance on preparing for and carrying out emergency response programs in a manner that results in the services being accessible to people with disabilities.)
(<http://www.ada.gov/emergencyprepguide.htm>)
- U.S. Department of Justice, Civil Rights Division, Disability Rights Section. *An ADA Guide for Local Governments: Making Community Emergency Preparedness and Response Programs Accessible for People with Disabilities*. (<http://www.ada.gov/emergencyprep.htm>)
- U.S. Department of Justice, Office of Justice Program, Bureau of Justice Assistance, Center for Program Evaluation:
<http://www.ojp.usdoj.gov/BJA/evaluation/index.html>
- U.S. General Accounting Office. *Executive Guide: Effectively Implementing the Government Performance and Results Act*. June 1996.
<http://www.gao.gov/special.pubs/gg96118.pdf>

S.W.O.T Analysis Sample Worksheet

EXAMPLE A county is considering the use of vote centers on Election Day and have decided to conduct an analysis of the strengths, weaknesses, opportunities, and threats that can assist or impede the successful development and implementation of this change. They are conducting the S.W.O.T. analysis as part of the overall identification and assessment process in preparation for developing and implement a contingency or change management plan.

Strengths and Weaknesses = internal factors (factors inside the office that can be an asset or an obstacle to achieving desired end result)

EXAMPLE budget, number of staff members, organizational structure, etc.

Opportunities and Threats = external factors (factors outside the office that can be an asset or an obstacle to achieving desired end result)

EXAMPLE community interest, public perception, changes in Federal/State laws, etc.

STRENGTHS	WEAKNESSES
<ul style="list-style-type: none"> ★ Office has the appropriate budget to make the change ★ Current staff is well trained and invested in the process 	<ul style="list-style-type: none"> ★ No current policies or procedures exist in the county regarding the use of vote centers ★ Current staffing level is already below what is needed – how will this change impact current staff's roles and responsibilities
OPPORTUNITIES	THREATS
<ul style="list-style-type: none"> ★ Strong community approval of vote centers ★ Several locations for vote centers have been identified that: are centrally located = accessible by public transportation, easily identifiable buildings, accessible by major routes, parking space accommodates large amounts of cars, etc. have the required space (inside and outside) 	<ul style="list-style-type: none"> ★ Identified locations do not agree to participate as vote centers ★ Difficulty in recruiting qualified poll workers



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