The Commonwealth of Massachusetts
William Francis Galvin, Secretary of the Commonwealth
Elections Division

M E M O R A N D U M

TO: U.S. Election Assistance Commission

FROM: Michelle K. Tassinari, Legal Counsel, Elections Division

DATE: April 22, 2005

RE: Comments on Proposed Voluntary Guidance on Implementation of
             Statewide Voter Registration Lists

Thank you for the opportunity to provide comments on the Proposed Voluntary Guidance on Implementation of Statewide Voter Registration Lists.

Background

In Massachusetts, we have had a statewide database since 1995. The Voter Registration Information System (VRIS) is the single, uniform, official, centralized, interactive computerized statewide voter registration list that was designed to comply with the National Voter Registration Act of 1993 (also known as 'Motor Voter') and implementing state legislation (G. L. c. 51, section 47C) and regulations (950 C.M.R. § 58.00 et seq). As a result of such legislation, all cities and towns in Massachusetts are required to maintain voting and election related information using this centralized system. The VRIS is a real-time database that supports over 1000 users in each of the 351 cities and towns of the Commonwealth. The VRIS also is used for maintenance of local census information.

One of the greatest concerns when implementing the system was security. Accordingly, the system was designed and remains a closed network with all users directly connected to the database rather than using an internet based system. The VRIS prides itself on maintaining a secure network and database. A dual layer of network password security exists in that users must log on to a Windows domain controller for network logon, and a separate user ID for database/application logon. Each user in the Commonwealth has individual user logons and pass codes to access the application/database. This database logon is a unique and traceable database identifier.

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The equipment used by each municipality was provided by the state, including hardware and software. Each municipality received at least one computer with monitor, mouse, keyboard, scanning device and printer. The number of systems deployed was based upon the number of registered voters in the municipality. The state also provides technical support through the Help Desk, a division of the Office of the Secretary of the Commonwealth. Additionally, new users are provided with training in their office upon request.

Although the system was first implemented in 1995, it has evolved greatly to include additional functionality including election maintenance, such as absentee ballot tracking, election results tallying and ballot generation. In my opinion, one of the best features added was expanded e-mail capabilities. Each of the users can e-mail each other as well as using a broadcast e-mail function. This is an important tool to quickly communicate with local election officials when new law is passed or policy implemented.

Presently, the system is not HAVA compliant. The only remaining component to make the system HAVA compliant is the verification of information through the Registry of Motor Vehicles. The development of that technology is currently underway. Since the passage of HAVA, the system was modified to store driver's license numbers or last four digits of a social security number and to identify on system generated voting lists those voters who will be required to present identification. Additionally, a provisional ballot tracking system was developed for municipalities to enter and maintain provisional balloting information that could be accessed by our office which has a toll-free telephone number.

Comments

I agree that the success of any system is dependent upon a cooperative effort by state and local election officials. In Massachusetts, elections are conducted on a municipal level, at the direction of 351 local election officials. Prior to the implementation of VRIS, each municipality had a different system of maintaining voters. The VRIS system as exists today is a result of a cooperative effort of the local election officials and the state. The development of the original system and all subsequent modifications has been achieved by suggestions and requests from the users themselves.

The staff that maintains the database meets regularly with a "User Group" comprised of representatives from both the City and Town Clerks' Associations. Any user that has suggestions provides them to the User Group and then the User Group presents them to our staff. This process has led to the development of a user-friendly system with extensive functionality. This process also led to the successful transition from local systems to using the statewide system. Additionally, having representatives from both cities and towns provides each

with different perspectives of the usability of suggested modifications relative to the size of the municipality.

I also agree that it is imperative to define the obligations of all parties clearly. The VRIS has regulations that define what information must specifically be entered into the system and the timeliness in which such entries must be made. Such definitions are critical to ensuring the accurateness of the information.

The proposed guidance is helpful for the development and implementation of a system, but in my opinion it is essential to include that any system being developed must incorporate the present functionality of local systems already being used. If the system provided to a local election official does not provide the functions that they already have in their local system, they will most likely maintain both systems. In my experience from the transition from local systems to the statewide system in Massachusetts, this is a dangerous practice that results in one list being compromised.

The capabilities of such systems can expand as user demands expand. Accordingly, I think it is important to continually improve any system to make it more useful. However, it would be helpful if the guidance would include the types of information that the Election Assistance Commission concludes are necessary to successful implementation—not just the names of voters, but also any other information that the Commission may seek in the future such as that related to absentee ballots and provisional ballots.

Again, thank you for the opportunity to participate in this process and please do not hesitate to contact with any additional questions.