

CONSIDERATIONS FOR MODIFYING THE SCALE OF IN-PERSON VOTING



This document is one in a series created as part of the Election Infrastructure Government Coordinating Council and Subsector Coordinating Council's Joint COVID Working Group. These documents provide guidance for state, local, tribal, and territorial election officials on how to administer and secure election infrastructure in light of the COVID-19 epidemic.

Increasing mail voting or expanding early voting may allow election officials to reduce the number of voting locations and poll workers required on Election Day. This could help mitigate the impacts of COVID-19 on the availability of poll workers or voting locations. However, reducing the number of locations can have dramatic effects on voter access, lines and congestion and should be done with caution and in view of considerations in this document. Election officials should assess any changes they are contemplating in comparison to the pre-COVID-19 voting model. The possible changes to the ratios of mail voting and in-person voting (Election Day and early voting) can be a starting point. The necessary policy decisions should be made as early as possible so that election officials have time to administer the change(s).

Any changes to locations and personnel come with corresponding changes to risks impacting election infrastructure. Addressing any increased risk early, as well as effectively communicating changes to stakeholders and to voters, can increase public access and participation, bolster trust, and support election infrastructure security by providing voters with clear information about the election process. It is important to communicate how security and integrity of the voting process will be maintained for mail voting processes, to increase public awareness of the security processes and to combat possible disinformation campaigns. See *Election Education and Outreach for Increased Absentee or Mail Voting* on the CISA [COVID-19 & Elections](#) webpage for additional information.

Officials should review this document in conjunction with the other [Government Coordinating Council \(GCC\)](#) and [Sector Coordinating Council \(SCC\)](#) Joint COVID Working Group documents.

HOW CAN YOU MAINTAIN A FOOTPRINT SIMILAR TO THAT USED ON PAST ELECTION DAYS?

The decision whether to maintain your current Election Day in-person voting footprint or modify the number of voting locations and workers will be based on the magnitude of change you expect from your jurisdiction's normal ratio of absentee/mail and early voting to in-person Election Day voting. Adjusting the in-person Election Day voting model may not be realistic unless other voting options are significantly expanded. Without extensive efforts, such as direct mail of absentee applications or a mail ballot, or changes to laws or policies permitting expanded use of absentee or mail voting, jurisdictions with historically low percentages of absentee voting may not reasonably be able to significantly reduce their Election Day footprint. Even in normal circumstances, presidential elections are high turnout elections that strain the capabilities of voting locations.

Jurisdictions that decide to conduct the election without changing the number of voting locations will need to plan to meet the same service expectations as in years past while providing the physical infrastructure and staffing levels to facilitate social distancing. Finding the same

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number of locations used in the past will take additional effort and may require help from other levels of government. Consider:

- Voting generally occurs in small facilities, many of which may not accommodate social distancing. Start working now to secure larger locations that can accommodate a redesigned polling place for voting in the COVID-19 environment.
- Work to significantly increase the use of publicly owned facilities, such as schools, that may be closed to other purposes for the day.
- Increased financial inducements for locations willing to serve.

Finding the same number of poll workers for your jurisdiction will also take additional effort. You may need a largely new workforce, requiring increased training efforts.

Line management is challenging under normal circumstances and will be even more so with polling locations modified to accommodate social distancing. Election officials will need to assess their jurisdiction's tolerance for lines and for voter perception of lines (and associated perceived wait time); however, for any given location, there are some additional considerations, such as:

- With precinct polling locations, the number of assigned voters is fixed by location, and therefore the maximum number of voters should be more predictable. While absentee/mail voting likely will increase, the level of increase will be hard to predict until closer to the election, and that increase may be distributed unevenly across the jurisdiction. Therefore, the expectations for in-person voting should likely be based on the number of voters that have historically come through a given polling place in prior presidential elections.
- Social distancing is still a factor. Wait times will likely be longer, and lines will also appear longer. Lines may also stretch outside the building, limiting poll workers' ability to control social distancing.
- Longer wait times and longer lines have been the subject of mis- and disinformation. Educating voters and media by driving them to trusted information can build resiliency and minimize the risk.

Please see *Finding Voting Locations and Poll Workers* on the CISA [COVID-19 & Elections](#) webpage for more details.

HOW CAN YOU COMBINE PRECINCT VOTING LOCATIONS IN A LARGER FACILITY TO MINIMIZE THE NUMBER OF FACILITIES?

If the expected demand for in-person voting is significantly decreased from prior presidential elections because of expanded absentee and mail voting or expanded early voting, there may be opportunities to combine locations using new or existing sites. Even with only marginal changes to demand, it may be possible to combine locations into larger facilities. In this model, the organizational scheme of Election Day in the jurisdiction remains fundamentally consistent, with voters assigned to precincts, precincts assigned to locations, and the voting equipment assigned either to precincts or locations. This consistency may be a virtue given other changes occurring simultaneously, such as changes to early voting or absentee and mail voting.

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Modifying the number of locations has unique consequences to consider, particularly if you do not expect a reduction in the number of in-person voters. Finding polling locations large enough to accommodate conjoined precincts—with the footprint needed for social distancing—may be a challenge. However, there are some administrative advantages, including:

- Moving precincts into voting locations serving neighboring precincts is a practice that election officials often employ already.
- To reduce the number of poll workers, if needed, consider programming voting technology to include all precincts in the voting location instead of programming voting equipment for individual precincts. This can functionally create one larger precinct allowing efficiencies such as one check-in operation rather than multiple check-in operations for each precinct, and full use of the space to lay out voting booths and voting machines. For example, if the polling place had four precincts, each with four physical work areas and five workers each, 20 workers in total, programming the voting technology to include in all precincts could allow the site to be operated with fewer than 20 workers, perhaps as few as 12–15.
- Alternatively, some minor reengineering of the polling place lay out, such as using non-precinct specific check-in stations for voters, but using distinct voting machines still programmed by precinct, could achieve some slight reduction in the need for poll workers.
- At the same time, larger, combined voting locations may benefit from enough workers to support new rules for social distancing—you may need workers to remind people to maintain 6 feet of distance, point them to hand sanitizing stations, or help them understand the new flow of their voting location. Therefore, combining two precincts, for example, into one location, and changing the voting technology programming to functionally create one large precinct, should not reduce the number of poll workers serving by half.

Line management will remain challenging with consolidation because:

- More people will be assigned to a given location.
- Specific absentee or mail voting data will not be available in time to combine locations with numeric precision, which can make predicting demand at specific locations difficult.

Depending on the percentage of people already voting either early, absentee or by mail in your jurisdictions, some locations will be affected by disproportionately longer lines. It will be difficult to predict which sites because voters' use of the other options across the jurisdiction generally does not distribute normally. Within counties and cities some communities have historical cultural preferences for methods and those must be accounted for.

Voter education will be important and similar to existing planning. However:

- Assignment of voters to new voting locations likely comes with legal notice requirements.
- A significant increase in new reassignments should include a strong outreach campaign and additional mailings, pursuant to applicable state and federal law.

Stakeholder engagement is a critical component of selecting or combining locations. These decisions have potential implications for different stakeholder groups. You should address this

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issue as soon as possible to encourage community acceptance and avoid impacting certain communities disproportionately.

HOW CAN YOU SHIFT TO VOTE CENTERS OR OTHER ALTERNATIVE LOCATIONS?

Shifting from precinct-based voting to vote centers requires detailed advance planning and has significant administrative and back office impacts. However, it may also address location and poll worker shortages.

Some significant challenges accompanying this model are described below. The [Other Resources](#) section includes reference documents that may be valuable, as well.

A move to vote centers may require changes in voting technology and pollbook infrastructure. For example, if voting equipment is used to tabulate ballots in the voting location, it will need to be programmed to accept all ballot styles for the entire jurisdiction. Also, electronic pollbooks will need to be networked and have a direct connection to the voter registration database in order to allow voters to vote anywhere and ensure no one votes twice.

Legacy voting equipment may have limitations in a vote center model, particularly for equipment that has limitations on the type or number of different ballot styles it is able to accept simultaneously. One workaround would be assigning voters to regional vote centers and managing voting equipment limitations by using multiple precinct scanners, each handling a range of precincts or ballot styles. For example, Scanner 1 can accept ballots from Precincts A–D, while Scanner 2 accepts ballots from Precinct X–Z. This could create additional logistical issues directing voters inside the vote center after they receive their ballots because they would need to be directed to the appropriate voting equipment.

In addition, assigning voters to these regional locations, as well as the public messaging informing voters of their new location assignment, can create travel and communication issues for administrators and voters.

Jurisdictions also may not have enough of the equipment they need for the transition to vote centers. For example, while ballot marking devices (BMDs) can contain many ballot styles and are used often in these environments to avoid pre-printing significant quantities of all ballot styles, many precinct-based locations keep only one such device in each voting location to meet Help America Vote Act (HAVA) accessibility requirements. Scaling up to a vote center model may require jurisdictions to procure more of these devices to meet capacity.

For jurisdictions that choose to use hand-marked paper ballots in this environment, the challenge will be keeping an adequate supply of pre-printed ballots (including provisional ballots) for every ballot style, in every location. Ballot on Demand (BOD) technology is a potential solution. If the jurisdiction is not already using the technology, however, the acquisition and installation of this technology between now and the 2020 general election may introduce new hurdles.

In a vote center model, electronic pollbooks are necessary to manage the voter list and ensure that voter history is updated in real time. Connectivity introduces new operational and security risks, including:

- Finding locations that have Internet connectivity may be challenging.

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- Having reliable, consistent, and constant connectivity, with both a primary and redundant solution, has associated challenges and risks.
- Acquiring and implementing new hardware, software, and election technology may add cyber risk and create operational risk, especially under tight timelines.
- Regardless of whether new hardware is needed, there may be a need to make design and configuration modifications for existing software or voter registration database systems, which introduce cybersecurity and operational risks.

Finding locations to accommodate the potential size of the voting population may be difficult. The constraints noted above and in the document *Finding Voting Locations and Poll Workers* on the CISA [COVID-19 & Elections](#) webpage apply. In addition, consider the following:

- Locations will need to be large enough to meet demand. They will need to have electricity and connectivity bandwidth to meet demands of polling place technology (e.g., voting equipment, electronic pollbooks ballot-on-demand printers, etc.).
- Acquiring these locations could be difficult because similar large sites may have already been repurposed for temporary healthcare or other COVID-19 community needs (e.g., school lunch distribution).
- Larger locations will come with increased demand for parking and accessibility.

Reducing the number of poll workers needed is likely among the biggest advantages of moving to a vote center model. Requiring fewer poll workers may also provide opportunities for new, more effective training methods.

Ensuring adequate capacity at each site is always a challenge, and with the “vote anywhere” model, it is difficult to know who will vote where and when during the day. Finding a way to encourage voters to use particular locations can help load balancing during voting. Some jurisdictions have found actively pushing voters to particular sites through direct mail, for example, can generate a reasonably high level of compliance. Similarly, the use of social media on Election Day alerting voters to line length information available on your website may work to highlight specific voting locations that have less traffic than others. Such efforts mitigate the effects of capacity constraints that affect some locations more than others and may help with line management. These measures require good mapping, modeling, and most importantly, direct mail nudging voters to the preferred/closest location for voting. Locations in heavily trafficked “downtown” business and transit centers present the greatest capacity issues and are least predictable.

Line management concerns will be similar to those described in *Finding Voting Locations and Poll Workers* on the CISA [COVID-19 & Elections](#) webpage. However, the vote center environment may allow for creative line management techniques. Instituting new technology or practices, such as allowing voters to take a ticket and be notified in some manner of their turn, may be possible. More information on these options is available in *Extraordinary Measures and New Solutions* on the CISA [COVID-19 & Elections](#) webpage. Consider the following:

- Implementing extraordinary measures and new solutions will take investments of time and potentially money and could require a high level of effort in what may be a short period of time.

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- While changes such as these can be difficult and risky without an adequate opportunity to be piloted, they may offer the safest alternative to managing lines.

Voter education will be important with any changes to the voting model, especially introduction of a completely new model. A brand-new voting experience necessitates a strong campaign and significant additional mailings and advertising.

Stakeholder engagement is a critical component of location selection and combination. These decisions have potential implications for different stakeholder groups. Addressing this issue should be done as soon as possible to encourage community acceptance and avoid claims that your chosen changes might have an electoral impact.

HOW CAN YOU INSTITUTE OR EXPAND EARLY IN-PERSON VOTING?

Early or advance in-person voting can be valuable because it offers voters a choice of when they engage. When presented with choices, voters are empowered to protect themselves using the best option for their risk tolerance. Not all states currently offer early in-person voting opportunities, and those that do offer it have different requirements. Offering or expanding early in-person voting can allow poll workers and voters to socially distance more effectively by spreading people across days. Additionally, it can significantly reduce the demand for in-person voting on Election Day itself, further allowing election officials to reduce their footprint on that day.

Most considerations for instituting or expanding in-person early voting are the same as those of utilizing vote centers on Election Day, but the following are some specific impacts on site selection and availability:

- Availability may be affected depending on the length of time requested for the early voting period.
- Locations may be unwilling to commit to exclusive use for voting because of the longer time commitment. This is true for both public and private facilities.

Whatever the offering for early and advance voting periods, it is important to consider persistent public messaging on voting hours and locations. Uniformity of voting hours across a jurisdiction is easier for voters, but you must keep it in mind as you negotiate with locations because your desired hours may be outside their normal operating hours.

SECURITY RESOURCES

General

- Sign up for CISA services, such as vulnerability scans remote penetration testing (RPT), phishing campaign assessment, etc. All CISA services can be located in the [CISA Election Infrastructure Security Resource Guide](#). All services can be requested at EISSA@cisa.dhs.gov.
- Invite your regional Cybersecurity and Infrastructure Security Agency (CISA) Physical Security Advisor (PSA) for an [Assist Visit](#).

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- ❑ Work with your PSA after the visit to fill out the [Infrastructure Survey Tool](#) (IST) to identify and document the overall security and resilience of the facility.
- ❑ To gain situational awareness of the threats to the election infrastructure, become an EI-ISAC Member by visiting <https://www.cisecurity.org/ei-isac/>.

Vote Center Resources

- ❑ [California Civic Engagement Project Vote Center Sitting Tool](#)
- ❑ [National Conference of State Legislatures \(NCSL\) Report on Vote Centers](#)
- ❑ [Indiana Report on Vote Centers](#)
- ❑ [Runbeck Vote Center Report at NASS 2018](#)
- ❑ [Ball State University Report on Vote Centers](#)
- ❑ [VR System Report on Vote Centers in California](#)

OTHER RESOURCES

Center for Disease Control and Prevention (CDC)

- ❑ [CDC Situation Summary webpage](#)—This page provides updated information and guidance on the novel coronavirus and COVID-19.
- ❑ [CDC Coronavirus index webpage](#)—This page provides links to all CDC resources on the novel coronavirus and COVID-19.
- ❑ [CDC List of State and Territorial Health Department Websites](#)—This page provides links to all websites of state and territory health departments, which the CDC recommends consulting for state-specific information on the novel coronavirus and COVID-19.
- ❑ [CDC Recommended Precautions for Preventing Spread of COVID-19 in Election Polling Locations, including Cleaning and Disinfection](#)—This guidance provides recommendations on the routine cleaning and disinfection of polling location areas and associated electronic equipment. It suggests actions poll workers can take to reduce the risk of exposure to COVID-19 by limiting the survival of the virus in the environment. According to the CDC, this guidance will be updated if additional information becomes available.
 - ❑ There is a section on recommendations for processing mail-in ballots. The CDC states that workers handling mail-in ballots should practice hand hygiene frequently and no additional precautions are recommended for storage of ballots.
- ❑ [CDC Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 \(COVID-19\), February 2020](#)—This interim guidance for

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businesses may be relevant to election offices. It seeks to help prevent workplace exposures to acute respiratory illnesses, including COVID-19, in non-healthcare settings. The guidance also provides planning considerations if there are more widespread, community outbreaks of COVID-19.

CYBERSECURITY AND INFRASTRUCTURE SECURITY AGENCY (CISA)

- ❑ **CISA Coronavirus webpage**—This page provides information on CISA's efforts with federal partners concerning coronavirus and COVID-19 and links to other federal resources.
- ❑ **CISA Insights: Risk Management for Novel Coronavirus (COVID-19)**—This brief provides recommendations on how to address physical supply chain and cybersecurity issues that may arise from the spread of the novel coronavirus. This resource is helpful for election officials to prepare for possible impacts of the novel coronavirus.

ELECTION ASSISTANCE COMMISSION (EAC)

- ❑ **EAC Disaster Preparedness and Recovery webpage**—This page features presentations from election administrators about how they conducted elections in the face of a variety of natural disasters. Their examples of preparedness and recovery could be helpful for election officials as they address the novel coronavirus and COVID-19.
- ❑ **EAC Contingency Plans webpage**—In preparation for the 2016 elections, the EAC collected continuity of operations plans (COOPs) and resources from election officials at the state and local levels. This includes state-specific examples for H1N1 flu preparedness.
- ❑ **EAC Election Management Guidelines Chapter 11: Contingency Planning and Change Management**—This 2009 resource was created to assist state and local election officials in effectively managing and administering elections. Each chapter explores a different aspect of election administration and provides examples and recommendations.

This document was finalized on May 28, 2020. The situation and resultant guidance are subject to change. For current public health guidance relating to COVID-19, see [coronavirus.gov](https://www.cdc.gov/coronavirus). Election officials should also consult their state and local laws, including any applicable executive orders, regarding social distancing and other required or recommended public health practices (such as the wearing of masks by non-medical personnel).