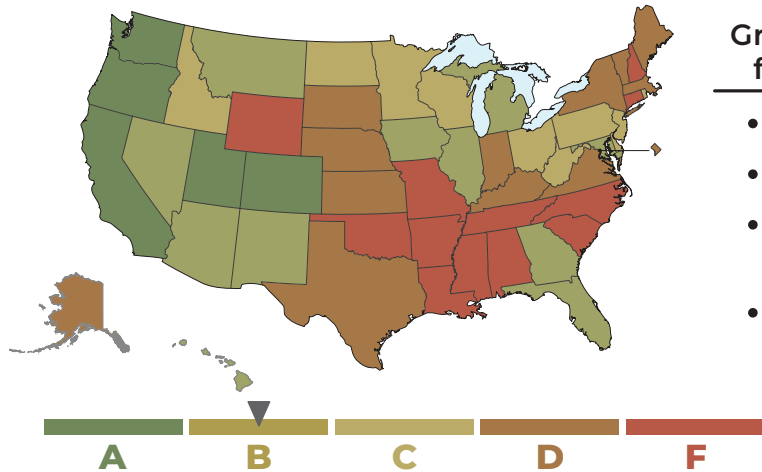# Best Practices for Vote By Mail in Arizona

Voting in Arizona

Arizona has more than 4 million registered voters in its 15 counties, ranging from 5,045 in Greenlee County) to 2.6 million in Maricopa County). In the 2018 election, more than three-quarters of Arizonans voted by mail. Of that election's 7,786 poll workers, 60% were 60 or older—an age group at a higher risk for severe illness from COVID-19.

Although most Arizonans vote by mail, election administrators were still strained to find enough workers to meet the demand for in-person voting for the March 17 primary. Secretary of State Katie Hobbs urged state lawmakers to give counties the option to conduct all-mail elections this August and November. Legislators did not take action on a bill that would give counties this choice so long as a county's permanent vote by mail list comprises 60% of county voters, but they could take up a similar proposal in a special session later this year.

Arizona's grade for Vote By Mail preparedness

Grades based on 15 factors covering

- Ease of access
- Ballot security
- Election infrastructure
- Administrative efficiency

A   B   C   D   F

B

Ways in which Arizona is already prepared

- Allows early in-person voting starting 26 days before Election Day.
- Provides a postage-prepaid return envelope for mailed ballots.
- Has an official notice and cure process.
- Allows any voter to request an absentee ballot.
- Is a member of the Electronic Registration Information Center (ERIC).
- Offers voters a "single sign-up" option to permanently vote by mail.
- Uses voters' signatures to verify ballots.
- Allows county clerks to process ballots starting 14 days before Election Day.
- Allows voters to request an absentee ballot online.

Vote By Mail for Secure 2020 Elections
A Step-by-Step Guide for Arizona

The moment
American election officials face an urgent challenge to secure elections in 2020. As poll workers and voters grapple with the coronavirus threat, many jurisdictions are unable to find enough workers to run their usual polling places and many Americans are seeking to cast their ballot from home rather than risk contagion in a crowded polling place in November.

About this resource
This state-specific step-by-step guide compiles best practices from around the country, including practical nuts-and-bolts advice for **local election officials**, materials and guidelines from election administrators with experience conducting all-mail elections, information about vendors and costs, and best practices for **secretaries of states**.

There is much that the **Arizona Legislature** could do to assist clerks in modernizing elections. The governor might be able to temporarily enact some of these recommendations using emergency powers, but ultimately legislators need to pass laws to enable safe and secure elections every year. Even if Arizona lawmakers don't act in time for November 2020, the experience of hastily trying to secure elections this year may create a greater political appetite for reforms to strengthen democracy in Arizona beyond 2020. This resource describes tried-and-tested reforms, along with sample language from other states that have already taken these steps.

Each section features recommendations arranged roughly in order of importance for safe and secure elections and ease of implementation. We hope that Arizona election officials, advocates, and legislators will find this resource useful as they work to handle more Vote By Mail ballots in 2020 and beyond.

Who we are
Sightline is a nonpartisan, nonprofit think tank with a 25-year history. We are based in the Pacific Northwest, where many states already conduct elections by mail. Our experience working on local and state-based democracy reforms, as well as our relationships with experienced clerks, spurred us to compile this information to help give other clerks a running start on conducting safe elections with more mailed-out ballots on a short timeline.

Table of Contents

For Local Election Officials

1.   Coordinate with USPS®.

To ensure that the United States Postal Service (USPS) is able to process ballots in a timely manner, election administrators can contact the local USPS election mail coordinator to discuss the design, timing and volume of election materials. The USPS can review all materials to ensure the design, wording, and colors meet their guidelines, and sign off on the printer's proofs. Election administrators can also discuss the date, time, and location for delivery of ballots to the Post Office, to ensure the Post Office is prepared. For example, King County, Washington, election administrators send a letter alerting USPS to the number, type, and timing of ballots they expect to deliver each election.

USPS may also be able to help election administrators access the National Change of Address Linkage (NCOA) to update voters' addresses. Arizona is already a member of the Electronic Registration Information Center (ERIC) which uses NCOA data to help Arizona keep voter lists up-to-date. However, voters may have moved since the last state update and local officials can access the latest address information for their voters. Having the most up-to-date addresses will ensure each ballot reaches the right voter, reducing the costs of re-mailing ballots.

Resources:
- Look up your local point of contact at the USPS.[1]
- USPS Election Mail Kit.[2]
- Follow USPS Election Mail guidelines.[3]
- Election officials can report problems to USPS through electionmail.org.[4]
- A 2020 webinar on best practices for tracking and reporting, and the slides[5]
- CISA Guidance on Managing an Increase in Outbound Ballots[6]
- Vote at Home Policy and Research Guide, pg 19.[7]

Example Guidance Language:
- Oregon Procedures Manual 2020.[8]

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[1] https://about.usps.com/gov-services/election-mail/political-mail-map.htm
[2] https://about.usps.com/kits/kit600.pdf
[3] https://about.usps.com/gov-services/election-mail/
[4] https://electionmail.org/
[5] https://www.techandciviclife.org/vote-at-home/
[6] https://www.in.gov/sos/elections/files/COVID-19%20Election%20GUIDANCE%20ONLY.pdf#page=56
[7] https://www.voteathome.org/wp-content/uploads/2019/03/VAH-Policy-and-Research-Guide.pdf#page=19
[8] https://sos.oregon.gov/elections/documents/vbm_manual.pdf#page=26

- [Alaska Vote by Mail Project](#).[9]
- [Ohio Election Official Manual](#), pgs 5-22.[10]

2.   Design ballots and envelopes that are easy to use.

Well-designed envelopes, ballots, forms, and instructions help voters fill out their ballots and return them without mistakes, decreasing processing time and minimizing the chance that ballots will be flagged, thrown out, or not counted. In contrast, poorly designed instructions or ballots can cause voters to fill out their ballot incorrectly or incompletely so that their vote is not counted.[11]

Ensure election materials are easy so that voters who may be voting by mail for the first time don't make mistakes. For example, first-time absentee voters may not know they need to sign the outside of their envelope, so putting their name under the signature line and simple clear instructions can help prompt them and reduce the number of ballots that you need to spend extra time processing. Also, pre-filling the absentee application form can help voters complete it correctly (See Recommendation 10).

Color-coded envelopes can help the USPS sort the mail quickly and accurately, and including space for voters' contact information can help election officials reach voters promptly in the event of a missing or mismatched signature. Experienced election officials and design experts have developed guidelines and templates for election materials, as described in the resources below.

Another important way to assist voters is to design and distribute voter education booklets to help guide voters through the process. For example, Anchorage, Alaska moved to All Vote By Mail in 2018. In addition to a robust [community education campaign](#), the city extended hours for a call center in the month leading up to the election. Here's an example of their [voter information flyer](#). Make all the above voter materials and web portal available in multiple languages to reach all voters. In total, the Brennan Center for Justice estimates the cost for voter education materials at between [50 cents to 88 cents per person](#).

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[9] https://www.muni.org/departments/assembly/clerk/elections/documents/vote%20by%20mail%20project%20final%20report%20mas%201026%20annual%20report_030819.pdf#page=5

[10] https://www.ohiosos.gov/globalassets/elections/directives/2019/dir2019-11_eom.pdf#page=197

[11] https://www.washingtonpost.com/video/opinions/dont-let-mail-in-voting-be-thwarted-by-badly-designed-ballots/2020/05/18/1cce7c56-5312-44a8-afa9-fb813970f854_video.html

Resources:

- The Center for Civic Design[12] has a series design guidelines for election officials, based on solid research and best practices. These include resources on designing envelopes and forms, such as: vote at home envelopes and information, a field guide to designing vote at home envelopes and ballots, Vote By Mail envelope design, writing ballot instructions voters can understand, creating forms that help voters take action.[13] They also have guidelines about educational materials, such as: How to design voter education booklets and flyers, creating accessible online information, and Providing materials in multiple languages.[14]
- A 2020 webinar on best practices for envelope design, and the slides.[15]
- USPS guidance on designing election mail.[16]
- A 2020 webinar on preparing helpful supplementary materials; and the slides from Anchorage, Alaska which moved to all Vote By Mail in 2018.[17]
- Cybersecurity and Infrastructure Security Agency Voter Education Guidance.[18]

Example Legislative Language:

Revised Codes Washington 29A.40.091. Envelopes, declaration, and instructions—Voter's oath—Overseas and service voters—Return of ballots—County auditor's name.[19]

Ballots and envelopes must have the date of election printed on them. Return envelopes must have space for a telephone number, which is used if the signature is mismatched.

Revised Codes Washington 29A.36. Ballots and other voting forms.[20]

Detailed guidance on formatting, contracts with vendors, sample ballots, and instructions.

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[12] Jurisdictions in Arizona, California, Colorado, Connecticut, District of Columbia, Florida, Georgia, Hawaii, Idaho, Illinois, Iowa, Kansas, Kentucky, Maine, Maryland, Massachusetts, Minnesota, New York, North Carolina, Oregon, Pennsylvania, Rhode Island, Utah, Vermont, Virginia, Washington, West Virginia, and Wisconsin have worked with the Center for Civic Design and 1 in 4 voters have used their designs.

[13] https://civicdesign.org/fieldguides/

[14] https://civicdesign.org/fieldguides/

[15] https://www.techandciviclife.org/vote-at-home/

[16] https://about.usps.com/election-mail/design-election-mail.htm

[17] https://vimeo.com/393307242 and https://www.techandciviclife.org/wp-content/uploads/2020/01/PDF-VAH-Webinar-2-Preparing-helpful-supplementary-materials.pdf

[18] https://www.cisa.gov/sites/default/files/publications/election_education_outreach_absentee_508.pdf

[19] http://lawfilesext.leg.wa.gov/biennium/2019-20/Pdf/Bills/Session%20Laws/House/1520-S.SL.pdf

[20] https://app.leg.wa.gov/RCW/default.aspx?cite=29A.36

Example Guidance Language:
- Washington State Ballot Format Checklist 2019.[21]
- Washington Administrative Code 434-230 Ballots.[22]
- Washington Administrative Code 434-230-010 Sample Ballots.[23]
- Colorado Elections Policy Manual, pg 26.[24]
- Oregon VBM Manual, pg 23.[25]

3.   Implement robust signature verification.

Arizona election officials already have experience verifying signatures to protect against fraud while also avoiding mistaken voter disenfranchisement.[26] As your county handles more ballots by mail due to COVID-19, here are steps you may take to implement efficient and effective signature verification.

First, digitize the voter signatures you have on file. The more signatures you can digitize, the more accurate the verification can be.[27] You can use signatures from each voter's registration, their absentee ballot request form, prior mailed ballots, and also their signatures from the DMV or other state agencies.

Second, train enough workers to inspect signatures. You can model your training program on procedures developed in Washington, Oregon, and Colorado (See Resources). Forensic scientists, possibly from yours or a neighboring state's patrol, may be able to help train your workers.

Third, implement a two-stage signature review. In the first stage, trained workers or specialized equipment compares the signature on the envelope to the digitized signatures on file. If the signatures match, the ballot is moved to an "accepted" pile, but if there is a discrepancy it is moved to a "flagged for further review" pile. In King County, Washington, trained inspectors flag around 2.5 percent of ballots during this initial review. Flagged ballots then go to another team of trained workers who closely examine the ballots and

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[21] https://www.sos.wa.gov/_assets/elections/administrators/2019-ballot-format-checklist.pdf

[22] https://apps.leg.wa.gov/wac/default.aspx?cite=434-230

[23] https://apps.leg.wa.gov/wac/default.aspx?cite=434-230-010&pdf=true

[24] https://www.sos.state.co.us/pubs/elections/policyManual/ElectionsPolicyManual.pdf#page=26

[25] https://sos.oregon.gov/elections/documents/vbm_manual.pdf#page=23

[26] To verify the identity of voters who can't sign due to disability, you can give the option to fill out a form enabling them to use a signature stamp.

[27] https://www.voteathome.org/wp-content/uploads/2019/03/VAH-Policy-and-Research-Guide.pdf#page=18

decide whether to accept or challenge them. King County inspectors challenge about 1 percent of signatures.

Finally, for all challenged signatures, notify voters and give them an opportunity to respond so that their ballot can still be counted.

Resources:

- The Colorado Secretary of State has a helpful "Signature Verification Guide" with examples.[28]
- The elections administrator in King County, Washington has a Signature Verification Training presentation, including signature examples and examples of common problems with signatures.[29]
- Voters' signatures change over time, so if you don't have a recent signature on file for a voter, you can ask them to update it. The elections administrator in King County, Washington has an example of a form they send to voters.[30] In preparation for moving to an All Vote By Mail election, Hawaii recently sent a postcard to all their registered voters asking for an updated signature for reference.[31]
- 45 minute webinar about signature verification from Oregon Secretary of State Elections Division.[32]
- Election Assistance Commission Signature Verification Cure Process.[33]
- Tour of election facilities King County, Washington.[34]
- Oregon signature stamp attestation form.[35]
- Hawaii drive for signature updates in advance of VBM primary.[36]
- CISA Ballot Verification and Signature Verification and Cure Process.[37]

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[28] https://www.sos.state.co.us/pubs/elections/docs/SignatureVerificationGuide.pdf

[29] Zip file available at https://aqua.kingcounty.gov/elections/docs/vbm/VBM-information.zip. In folder "ballot processing," file called "Signature Verification training Updated.pptx"

[30] Zip file available at https://aqua.kingcounty.gov/elections/docs/vbm/VBM-information.zip. In folder "ballot processing," file called "Signature-update-letter-April-May 2016-English.pdf"

[31] https://elections.hawaii.gov/main/sign-sealed-and-counted-securing-your-vote/

[32] https://www.youtube.com/watch?v=UKiYGONnNT0&feature=youtu.be

[33] https://www.eac.gov/sites/default/files/electionofficials/vbm/Signature_Verification_Cure_Process.pdf

[34] https://kingcounty.gov/depts/elections/education-and-outreach/take-a-tour.aspx

[35] https://sos.oregon.gov/elections/Documents/SEL540.pdf

[36] https://elections.hawaii.gov/main/sign-sealed-and-counted-securing-your-vote/

[37] https://www.in.gov/sos/elections/files/COVID-19%20Election%20GUIDANCE%20ONLY.pdf#page=48 and https://www.in.gov/sos/elections/files/COVID-19%20Election%20GUIDANCE%20ONLY.pdf#page=63

Example Legislative Language:
Revised Codes Washington [29A.40.110](#). Processing incoming ballots.[38]
Verification may be conducted by approved automatic verification systems. Variation in signature between the return envelope and the registration record due to initials or common nicknames is permitted as long as the surname is the same and the handwriting matches.

Example Guidance Language:
- Washington Administrative Codes [434-250-120](#).[39]
- Oregon [VBM Manual](#), pg 35; Oregon [Appendix on Evaluating Signatures](#).[40]

4.   Provide secure drop boxes.

In states that mail out all ballots, most voters return them to secure drop boxes, rather than via the USPS. To accommodate this, counties should provide enough drop boxes to make them easily accessible to all voters. Each county should have at least one box that is available 24/7; more populous counties should aim to have one drop box per 10,000 voters. Drop boxes are especially important if Arizona continues to require receipt of ballots by Election Day. Voters looking to turn their ballot in on Election Day can drop it at a drop box instead of dropping it in a mailbox and risking it missing the deadline (See Recommendation 12).

Many jurisdictions site some drop boxes inside government buildings. However, boxes available 24/7 are more frequently used than those inside buildings and only open during business hours. Outside drop boxes need to be in well-lit areas covered by security cameras. Boxes should also be secure, only allowing election officials to access ballots.

In 2018, Oregon and Washington,[41] two states that mail out all ballots, had one drop box per 8,800[42] and 10,000[43] voters, respectively. King County, Washington strategically sited its drop boxes to ensure that 95% of voters lived within [3 miles of a box](#). Election

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[38] https://app.leg.wa.gov/RCW/default.aspx?cite=29A.40.110

[39] https://apps.leg.wa.gov/wac/default.aspx?cite=434-250-120

[40] https://sos.oregon.gov/elections/documents/vbm_manual.pdf#page=35 and https://sos.oregon.gov/elections/documents/vbm_manual.pdf#page=83

[41] https://www.sos.wa.gov/_assets/elections/ballot%20drop%20boxes%202019%20general%20election.pdf ; https://www.sos.wa.gov/elections/general-election-2019.aspx

[42] In 2018, Oregon had 311 drop boxes (one per 8,800 voters) with 165 of those boxes available 24/7.

[43] In 2018, Washington had 471 drop box (one per 10,000 voters) with 323 of those boxes available 24/7. https://www.sos.wa.gov/_assets/elections/ballot%20drop%20boxes%202019%20general%20election.pdf ; https://www.sos.wa.gov/elections/general-election-2019.aspx

administrators should place drop boxes approximately one month before elections and publicize locations on their website and in local news outlets.

Election officials should be prepared for voters to drop off ballots in precincts and jurisdictions other than their own.

Cost/Savings:

- Drop boxes used in King County, Washington cost $5,235 each and installation cost around $20,000 to install a total of 37 drop boxes.[44]
- In Pierce County, Washington each drop box cost between $7,000 and $10,000 to purchase and install.
- Other counties have paid between $2,100 and $3,500 to purchase and install drop boxes. Operational costs per box appear to be anywhere between $300 to $4,000 per box, per election season.[45]

Resources:

- [Bipartisan Policy Center 2020](.).[46]
- Mailed-Out Ballot Return Choices, National [Vote At Home Institute, 2018](.).[47]
- Washington Counties [Ballot Drop Box Webinar](.).[48]
- King County Ballot Drop Box resources detail their vendors, ballot collection procedures, and tier system, which is based on expected ballot volume.[49]
- [Laserfab Vote Armor](.) produces the heavy-duty drop boxes used in many states from Washington to Colorado.

Example Legislative Language:

Revised Code of Washington [29A.40.170](.). Ballot drop boxes.[50]
Details required drop box security measures and requires at least one drop box per 15,000 voters.

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[44] https://kingcounty.gov/~/media/depts/elections/about-us/reports/bdol-expansion-plan.ashx?la=en

[45] https://wsac.org/wp-content/uploads/2019/12/WSAC-et-al-v-State-of-Washington.pdf

[46] https://bipartisanpolicy.org/wp-content/uploads/2020/01/Bipartison_Elections-Task-Force_R01_crops.pdf#page=28

[47] https://www.voteathome.org/wp-content/uploads/2018/12/Optimizing-ballot-return-choices.pdf

[48] https://www.youtube.com/watch?v=pBRYsy9LlcU&feature=youtu.be

[49] Zip file available at https://aqua.kingcounty.gov/elections/docs/vbm/VBM-information.zip. In folder "Ballot drop boxes," multiple files.

[50] https://app.leg.wa.gov/RCW/default.aspx?cite=29A.40.170

Example Guidance Language:
- Washington State Clearinghouse Notification on Ballot Drop Boxes in All Communities.[51]
- Washington Administrative Codes 434-250-100. Ballot deposit sites.[52]
- Oregon VBM Manual, pgs 10-15.[53]

5.   Provide Election Day voting centers for in-person voting.

Even if counties mail out all or most ballots, they should still provide in-person voting locations for those that prefer in-person voting, need additional assistance, or do not have a reliable mailing address. Each county should have at least one in-person center (it could be the county elections office), and more populous counties should aim to have one center per 30,000 voters. These locations will need an electronic poll book and the ability to print ballots on demand based on each voter's address.

Even states that conduct elections completely by mail still offer some in-person options. California mandates one voting center per 1,000 voters. In Oregon, voters can vote in-person at any county elections office. Though Colorado still opens voting centers on Election Day, the state was able to reduce the number of poll workers from 16,000 to fewer than 4,000[54] after implementing Vote By Mail.[55] The shift decreased labor cost per vote from $4.71 to $1.96.

According to the GAO, costs for polling sites can range from free (if using an existing agency facility) to $300 per day to rent a location. Employee costs to staff a voting center can range from $100-$235 per day.

Resources:
- VAH 2018 - Mail out ballot return options.[56]
- King County, Washington guidance on Vote Centers.[57]

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[51] https://www.sos.wa.gov/_assets/elections/auditorsctp/17-01%20ballot%20drop%20boxes%20in%20all%20communities.pdf

[52] https://apps.leg.wa.gov/wac/default.aspx?cite=434-250-100

[53] https://sos.oregon.gov/elections/documents/vbm_manual.pdf#page=10

[54] https://www.voteathome.org/wp-content/uploads/2019/03/VAH-Policy-and-Research-Guide.pdf

[55] https://www.pewtrusts.org/en/research-and-analysis/issue-briefs/2016/03/colorado-voting-reforms-early-results

[56] https://www.voteathome.org/wp-content/uploads/2018/12/Optimizing-ballot-return-choices.pdf

[57] Zip file available at https://aqua.kingcounty.gov/elections/docs/vbm/VBM-information.zip. In folder "Vote centers."

Example Legislative Language:
Revised Codes Washington [29A.40.160](#). Voting centers.[58]
Each county must have a voting center, open from 18 days before the election, which must be accessible for voters with disabilities.

Example Guidance Language:
- ▪ Washington Administrative Code [434-250-105](#). Voting Centers.[59]
- ▪ Colorado [Elections Policy Manual](#), pg 35.[60]
- ▪ Oregon [VBM Manual](#), pgs 10-15.[61]

6.   Consider using a professional printer and ballot sorter.

Many counties use professional printers and ballot sorters rather than printing ballots and envelopes and sorting them in-house. The move can save money and increase staff efficiency. According to the Brennan Center, printing costs [21.4 to 35 cents per ballot](#). The volume efficiencies in moving to an all Vote By Mail system result in lower per-voter printing costs. In Colorado, per vote total printing costs decline from [$6.86 to $3.04 per voter](#) after implementing full Vote By Mail.

Resources:
- ▪ Many Northwest counties use [K&H Integrated Print Solutions](#) to securely print their ballots and envelopes.[62]
- ▪ [Runbeck Election Services](#) has capacity to serve 10 percent of American voters.[63]
- ▪ [BlueCrest](#) serves 30 counties.[64]
- ▪ Many Oregon counties use Ryder Graphics[65] and Reprographics[66] to print and mail ballots. Some jurisdictions on the East Coast use Phoenix Graphics[67]
- ▪ Tri-Tek provides ballot sorting and signature verification services.[68]

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[58] https://app.leg.wa.gov/RCW/default.aspx?cite=29A.40.160

[59] https://apps.leg.wa.gov/wac/default.aspx?cite=434-250-105

[60] https://www.sos.state.co.us/pubs/elections/policyManual/ElectionsPolicyManual.pdf#page=35

[61] https://sos.oregon.gov/elections/documents/vbm_manual.pdf#page=10

[62] http://www.khprint.com/

[63] https://runbeck.net/

[64] https://www.bluecrestinc.com/solutions/vote-by-mail-relia-vote/

[65] http://rydergraphics.net/

[66] http://reproprinting.com/

[67] https://www.phoenix-graphics.com/absentee-mail

[68] https://tritektech.com/

Example Guidance Language:
- Colorado [Elections Policy Manual](#), pg 26.[69]
- Oregon [VBM Manual](#), pg 23.[70]

7.   Count ballots at a secure centralized facility.

Counting ballots in a secure, centralized facility enhances election security, transparency and efficiency. As noted in the resources section, election administrators in King County, Washington, count ballots in guarded facilities with continuous security camera monitoring, in addition to their ballot tracking system (See Recommendation 9). By setting up security surveillance equipment in ballot processing areas and streaming the footage online, voters can see for themselves how secure and transparent your vote counting procedures are. As with all election procedures, prepare for Election Day by rehearsing processes and timing various stages.

To the extent possible according to your state laws, counties that don't have an appropriate facility could coordinate with counties that do.

Resources:
- [FAQ](#) and [more information](#) about security and accountability from King County, Washington.[71]
- CISA [Inbound Ballot Process Recommendations](#).[72]

Example Guidance Language:
- Washington Administrative Codes [434-261-045](#). Secure Storage.[73]
- Oregon [VBM Manual](#), pg 8.[74]

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[69] https://www.sos.state.co.us/pubs/elections/policyManual/ElectionsPolicyManual.pdf#page=26
[70] https://sos.oregon.gov/elections/documents/vbm_manual.pdf#page=23
[71] https://kingcounty.gov/depts/elections/about-us/security-and-accountability/frequently-asked-questions.aspx and https://www.kingcounty.gov/depts/elections/about-us/security-and-accountability.aspx
[72] https://www.in.gov/sos/elections/files/COVID-19%20Election%20GUIDANCE%20ONLY.pdf#page=43
[73] https://apps.leg.wa.gov/wac/default.aspx?cite=434-261-045
[74] https://sos.oregon.gov/elections/documents/vbm_manual.pdf#page=8

8.   Invest in high-speed centralized equipment.

High-speed equipment can check unique barcodes on envelopes, sort envelopes, compare signatures against digital files, and tabulate ballots. For the 12 counties in Arizona with 25,000 or more registered voters,[75] investing in centralized equipment will allow you to efficiently process a high volume of absentee ballots. You will have reduced labor costs for every election for years to come. As your population increases, your high-speed equipment will be able to handle the increased number of ballots. Your county will be able to count ballots and finalize results faster.

Machines themselves may cost in the range of $50,000 to $100,000,[76] but counties usually purchase a contract installation and maintenance along with a new machine, and the total costs can be steep. For example, in 2017, King County, Washington purchased new scanning equipment for an average of about $130,000 per scanner. In 2015, Solano County, California purchased a machine plus five years of maintenance for $482,388. And, in 2017, Anchorage, Alaska spent $610,599 to purchase a Bell and Howell Envelope Intake and Signature Verification System, plus an additional $56,790 contract for installation and continued support.

Seven counties have high-speed centralized tabulators.[77] Three counties (Mohave, Pima, and Santa Cruz) have more than 25,000 registered voters, but no centralized equipment. They might consider investing in equipment this year. Counties that are not able to handle the volume of mailed ballots could contact the counties that do have high-speed scanners and make arrangements to coordinate use of equipment.

Resources:
- NCSL's Elections Technology Toolkit | Voting Machines and Beyond.[78]
- Cybersecurity and Infrastructure Security Agency Inbound Ballot Recommendations, pg 3.[79]

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[75] Apache, Cochise, Coconino, Gila, Maricopa, Mohave, Navajo, Pima, Pinal, Santa, Yavapai, Yuma
[76] https://www.brennancenter.org/our-work/research-reports/estimated-costs-covid-19-election-resiliency-measures
[77] Apache, Cochise, Gila, Maricopa, Navajo, Pinal, Yavapai
[78] https://www.ncsl.org/research/elections-and-campaigns/elections-technology-toolkit.aspx
[79] https://www.cisa.gov/sites/default/files/publications/inbound-ballot_process_final_508.pdf#page=3

For Secretaries of State

Clerks could independently implement these, but a coordinated statewide effort would be more effective.

9.   Use a comprehensive system to track ballots.

Comprehensive ballot tracking improves the security of absentee ballots and boosts voter confidence in mailed-out ballots. The service, offered by companies like Ballot Scout[80] and BallotTrax[81], uses intelligent barcodes to track every ballot and envelope, minimizing the risk of stolen or tampered ballots. It also increases transparency and accountability because voters can easily track when their ballot is on its way, received by election officials, and counted.

Ten states require tracking for absentee ballots[82] and thirty other states have some form of ballot tracking, though it is not required by statute. These tracking services may not be comprehensive. For example, in many states, voters can look up whether their ballot has been mailed but may not be able to find out if it has been accepted. In contrast, Ballot Scout and BallotTrax's comprehensive services can text voters about every step in their ballot's journey from being mailed, to arriving at their house, to being accepted. This gives voters a much higher degree of confidence about the system. That confidence could be especially important this year when many voters will be voting absentee for the first time, and questions are swirling about the security of mailed ballots.

By implementing a comprehensive ballot tracking system, Arizona can avoid problems such as those experienced in Wisconsin in their April 2020 primary. If Wisconsin election officials had had comprehensive secure ballot tracking in place during their recent primary, they would have seen that thousands of ballots got stuck in mail processing centers. This information would have given them the opportunity to contact USPS and address the problem before thousands of voters were denied the ability to safely vote at home even though they had requested their ballot in time.

Ballot tracking is cost-effective. For many states, depending on the number of voters and other implementation details, the software may cost around $50,000 per year. Although it would be most effective for the Secretary of State to enact statewide tracking, if they do

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[80] https://www.democracy.works/ballot-scout/

[81] https://ballottrax.com/

[82] California, Colorado, Delaware, Florida, Iowa, Maryland, New Hampshire, New Jersey, New Mexico, Virginia

not then local officials could step in. City or county administrators can sign up for local service, likely at a cost of a few thousand dollars per year.[83]

Example Legislative Language:
California Election Code § 3017 (c). Vote By Mail Application and Voting Procedures.[84]
The elections official shall establish procedures to track and confirm the receipt of voted Vote By Mail ballots and to make this information available by means of online access using the county's elections division Internet Web site.

Fla. Stat. § 101.62(1)(c). Request for Vote By Mail ballots.[85]
Upon receiving a request for a Vote By Mail ballot from an absent voter, the supervisor of elections shall notify the voter of the free access system that has been designated by the department for determining the status of his or her Vote By Mail ballot.

N.H. Rev. Stat. § 657:26. Absentee Voter Website. [86]
The secretary of state shall make available a public website by which an absentee voter, in every state election, may determine whether the voter's absentee ballot request has been received by the clerk, whether the absentee ballot has been sent pursuant to such request, whether the envelope purporting to contain the absentee ballot has been received by the clerk, and whether the absentee ballot was challenged and rejected by the moderator on Election Day, including the reason for the challenge.

Resources:
- A 2020 webinar from the Center on Tech and Civic Life on best practices for tracking and reporting, and the slides.[87]
- USPS helps process Vote By Mail ballots with Green Tag 191 and ballot-specific Service Type Identifiers (STIDs), using Intelligent Mail barcodes (IMB).[88]
- Denver's Ballot Trace lets voters opt in to receiving text messages when their ballot is mailed to them, when it is received by the election office, and when it has been approved for tabulation.

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[83] Pasco County, Texas pays $4,000 per year for Ballot Scout, and Milwaukie, Wisconsin could pay $7,500 per year. https://www.fastcompany.com/90501588/track-your-ballot-like-a-package-how-technology-will-smooth-the-way-for-novembers-mail-in-ballot-surge

[84] https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=ELEC&division=3.&title=&part=&chapter=1.&article=

[85] http://www.leg.state.fl.us/statutes/index.cfm?App_mode=Display_Statute&URL=0100-0199/0101/Sections/0101.62.html

[86] http://www.gencourt.state.nh.us/rsa/html/lxiii/657/657-mrg.htm

[87] https://www.techandciviclife.org/vote-at-home/

[88] https://about.usps.com/gov-services/election-mail/ and https://about.usps.com/postal-bulletin/2018/pb22498/html/cover_006.htm

- ▪ [Ballot Scout](#) is a web-based ballot tracking tool that works with USPS to allow administrators and voters to track every ballot with the same ease as an Amazon package.
- ▪ Counties in California, Oregon, and Washington use [BallotTrax](#) to track ballots.

Example Guidance Language:
- ▪ [Oregon Secretary of State's Vote By Mail Procedures Manual 2020](#).[89]

10.   Mail absentee applications to every registered voter.

Mailing absentee application forms to every registered voter in Arizona will increase absentee voting, reducing crowds on Election Day that could spread COVID-19. Several counties in Wisconsin mailed out absentee ballot application forms in advance of the April 2020 primary to great success: 67 percent voted[90] (a high turnout for a primary) and 90 percent of those voted absentee, leaving polling places uncrowded for the few voters who came in-person.[91] In the absences of leadership at the state level, counties officials could individually choose to mail out application forms to voters in their jurisdiction, but it would be more effective as a coordinated statewide effort.

In addition to boosting absentee voting rates, mailing out application forms can provide two more benefits: the signed form will provide clerks with a recent voter signature to use when verifying the ballot (See Recommendation 3), and it will help clerks update voter addresses so that more ballots will reach voters in November. To give enough time for undeliverables to come back to the clerk's office and for them to follow up with those voters to find out their current mailing address, aim to mail out application forms at least two months in advance of the election. To get a higher level of uptake, pre-fill the forms with information on file about that voter (such as name and address). That way voters can review, update as needed, sign and return. Use plain language to ensure voters fill out the form correctly, saving clerks time (See Recommendation 2).

Arizona law allows the secretary of state (or individual clerks) to choose whether to send applications to voters. The county will have to pay to print the and mail the application forms which should cost less than $2.00 per voter,[92] and will also pay for the labor of processing the forms. Many voters may choose the "single sign-up" option Arizona offers, saving you the cost of mailing and processing forms again.

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[89] https://sos.oregon.gov/elections/documents/vbm_manual.pdf#page=26
[90] http://www.wfbvillage.org/DocumentCenter/View/1091/April-2020---Election-Results
[91] https://www.motherjones.com/politics/2020/04/whitefish-bay-coronavirus/
[92] https://www.brennancenter.org/our-work/research-reports/estimated-costs-covid-19-election-resiliency-measures

Resources:

- CISA Guidance on [Helping Voters Request a Mail in Ballot](.).[93]

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[93] https://www.in.gov/sos/elections/files/COVID-19%20Election%20GUIDANCE%20ONLY.pdf#page=70

For Lawmakers

11.   Account for voters with non-traditional addresses.

Native American voters living on tribal lands often have non-USPS-standard mailing addresses, making it difficult for them to register to vote and receive ballots in the mail. They may have many family members living at the same address, and some states may not allow them all to receive a ballot. Or they may use a USPS box to receive mail, but live far from the nearest USPS office or election center, making it more difficult to receive and return their ballot in a timely fashion.[94] Eligible voters experiencing homelessness or housing insecurity may also not have a home address. Your state should make sure these voters can receive a ballot and securely vote.

Arizona should allow multiple eligible voters to use the same mailing address. Living with others to save on housing costs should not diminish any American's right to vote. Your state can allow native people to designate a building on the Nation's land to receive their ballot. Especially in areas where people live far from a USPS office, you can temporarily install drop boxes or vote centers on tribal lands to ensure that voters have viable options for returning their ballots.

You can allow homeless community members to receive their ballots at a shelter, park, motorhome, or other identifiable location. Alternatively, they can list the county elections office as their mailing address and pick up their ballots in person there. They can return their ballot to the elections office or a secure drop box.

Example Legislative Language:
Colorado Revised Statutes 1-2-102. Rules for determining residence.[95]
For voter registration residence, voters can identify a location in the county that they return to regularly, such as a shelter, services provider, park, campground, vacant lot, business address, or other physical location. If the registration residence does not have a mailing address, voters must also provide a mailing address.

Oregon Revised Statutes 247.038. Registration of person who is homeless or resides in identifiable location.[96]
Individuals who are homeless or reside in shelters, vehicles, marinas or other identifiable locations cannot be denied the opportunity to register to vote. Residence addresses can be descriptions of the physical location of the person or the office of the county clerk.

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[94] https://www.theguardian.com/commentisfree/2020/may/22/mail-in-voting-native-americans-election
[95] https://www.sos.state.co.us/pubs/info_center/laws/Title1/Title1Article2.html
[96] https://www.oregonlegislature.gov/bills_laws/ors/ors247.html

Revised Codes of Washington [29A.08.112](). Voters without traditional addresses.[97]

Voter registration accepts non-traditional addresses, defined as narrative descriptions of the voter's physical location. No person can be disqualified for lacking a traditional address. Voters must provide a mailing address. Tribes may designate a government building to serve as a mailing address for residents.

Example Guidance Language:
- Oregon [Vote By Mail Procedures Manual]() and [Oregon Secretary of State]().[98]
- Colorado Secretary of State [FAQs]() and [Election Rules]().[99]
- Washington State Clearinghouse Notification on [Voters Without Traditional Addresses]().[100]

12.   Allow counties to accept ballots postmarked on Election Day.

In 2018, less than 1 percent of mailed-out ballots in Arizona were rejected. But, of those that were rejected, 29 percent were rejected due to late receipt. That is more than 1,500 Arizona voters whose votes weren't counted. More Arizonans are likely to want to vote absentee this year, and a similar rejection rate for ballots received after Election Day could disenfranchise even more voters.

Thirteen states[101] accept ballots postmarked by Election Day and received within a certain period afterwards, usually around 10 days. This gives absentee voters the same freedom as in-person voters to mark their ballot and turn it in on Election Day. It also avoids confusion because voters don't have to guess how many days it could take the Postal Service to deliver their ballot; they know their deadline is Election Day. Allowing clerks to count ballots received or postmarked on Election Day and received within 10 days increases voter engagement and makes elections more representative of the people.

If you are not able to accept ballots received after Election Day, make this very clear to voters. In the ballot materials, tell voters not to put their ballot in the mail any later than

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[97] https://apps.leg.wa.gov/rcw/default.aspx?cite=29A.08.112
[98] https://sos.oregon.gov/elections/Documents/vbm_manual.pdf#page=19 and https://sos.oregon.gov/voting/Pages/homeless-confidential.aspx
[99] https://www.sos.state.co.us/pubs/elections/FAQs/foreclosureHomelessFAQ.html and https://www.sos.state.co.us/pubs/rule_making/CurrentRules/8CCR1505-1/Rule2.pdf#page=3
[100] https://www.sos.wa.gov/_assets/elections/auditorsctp/19-04%20voters%20without%20traditional%20addresses.pdf
[101] Alabama, Alaska, California, Illinois, Kansas, Maryland, New Jersey, New York, North Carolina, North Dakota, Texas, Washington, and West Virginia

the Wednesday before Election Day. And start running PSA's a few days before that to remind voters of the practical cut-off date, and that if they miss the deadline to drop it in the mail, they may drop it in a secure drop box or at a voting center up until Election Day (See Recommendations 4 and 5).

Example Legislative Language:
Alaska Statutes § 15.20.081(e). Absentee voting in general; applying for absentee ballot by mail or electronic transmission.[102]
Ballots must be postmarked by Election Day and received by the close of business on the 10th day after the election.

Illinois Compiled Statutes 10 § 5/19-8(c). Time and place of counting ballots.[103] ICS 10 § 5/18A-15. Validating and counting provisional ballots.[104]
Ballots must be postmarked by Election Day. Ballots received after Election Day without postmark shall be accepted if the certification date is on or before Election Day. Ballots must be received by 14 days after the election.

Kansas Statutes 25-1132. Advance voting; delivery of ballots; where; deadline for receiving ballots.[105]
Absentee ballots can be received after polls close as long as they were postmarked before or on Election Day and are received by 3 days after the election. This second standard is not recommended as USPS first class standard used to be 1-3 days, but is now 2-5 days.

Nevada Revised Statutes § 293.317(1)(b), (2). Procedure for timely returning absent ballot; treatment of absent ballot when postmark cannot be determined.[106] NRS 293.333(2) Procedure for depositing absent ballots in ballot box; period for counting of absent ballots.[107]
Ballots must be postmarked on or before the date of the election and received by 7 days after the election. If postmark is illegible but ballot is received within 3 days of election, it is considered valid.

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[102] http://www.akleg.gov/basis/statutes.asp#15.20.081

[103] http://ilga.gov/legislation/ilcs/documents/001000050K19-8.htm

[104] http://ilga.gov/legislation/ilcs/documents/001000050K18A-15.htm

[105] http://www.kslegislature.org/li/b2019_20/statute/025_000_0000_chapter/025_011_0000_article/025_011_0032_section/025_011_0032_k/

[106] https://www.leg.state.nv.us/nrs/nrs-293.html#NRS293Sec317

[107] https://www.leg.state.nv.us/nrs/nrs-293.html#NRS293Sec333

North Carolina General Statutes [163-231](#). Voting absentee ballots and transmitting them to the county board of elections.[108]
Absentee ballots can be received after polls close as long as they were postmarked before or on Election Day and are received by 3 days after the election. This second standard is not recommended as USPS first class standard used to be 1-3 days, but is now 2-5 days.

Example Guidance Language:

- Alaska Administrative Code [25.560](#). Timeliness of absentee by-mail ballot.[109]

13. Allow community organizations to collect and deliver sealed ballots

Twenty states allow anyone to deliver another voter's sealed and signed ballot. By allowing community organizations to help deliver completed and signed ballots, Arizona can increase voter turnout and help further enfranchise voters who face difficulty voting. For example, this policy can help voters who may lack access to a vehicle or who do not have access to consistent mail service.[110]

Ballot tracking and robust signature verification can prevent would-be ballot harvesters from collecting blank ballots and filling them in. Fraudsters can't access voters' signature files, and voters will notice if the tracking system reports their ballot as both delivered and returned, but they never received it.

Example Legislative Language:
Oregon Revised Statutes 254.470 (6)(d). Procedures for conducting election by mail.[111]
Allows anyone to deliver a completed and sealed ballot, as long as they do so within 2 days of receiving the ballot from the voter.

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[108] https://www.ncleg.net/EnactedLegislation/Statutes/HTML/ByChapter/Chapter_163.html

[109] http://www.akleg.gov/basis/aac.asp#6.25.560

[110] https://www.azcentral.com/story/news/politics/elections/2020/01/27/arizona-ballot-harvesting-law-discriminates-minority-voters-ninth-circuit/4589610002/

[111] https://www.oregonlaws.org/ors/254.470

14. Automatically register voters and update their address.

Seventeen states and DC automatically register eligible voters who prove their identity to a government agency such as the Department of Motor Vehicles.

It works like this: if a citizen interacts with an Arizona state agency like the DMV, the agency sends their information to the Secretary of State, who adds them to the voter rolls or updates their address. The state then sends voters a postcard letting them know of the change so they can opt-out if they didn't want to be registered to vote, or return their voter registration to their previous address if they didn't really move.

This is more efficient and accurate than Arizona's "opt-in" process which requires voters to fill out change of address forms. By streamlining and updating their data across agencies, states with automatic registration these states have cleaner and more up-to-date voter lists, meaning mailed ballots are more likely to reach the voter. Citizens may always choose whether they want to be registered, but "opt-out" systems result in higher voter participation.

Resources:

- Oregon Procedures Manual 2020.[112]
- Brennan Center study on the impact of Automatic Voter Registration.[113]

Example Legislative Language:

Illinois Compiled Statutes 10 § 5/1A-16.1. Automatic voter registration; Secretary of State.[114]
Most DMV interactions can serve as a dual purpose application for voter registration, address changes or name changes. No further identification is needed, but the Secretary of State will verify voter registration eligibility. Voters can opt out of registration during a DMV interaction. Other agencies are also implementing automatic voter registration.

Maryland Election Law Code Annotated § 3-203. Electronic Voter Registration System.[115]
Most transactions at the DMV, Health Benefits Exchange, local departments of social services, and the mobility certification office will automatically transmit voter registration applications or updates unless the voter opts out.

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[112] https://sos.oregon.gov/elections/documents/vbm_manual.pdf#page=16
[113] https://www.brennancenter.org/sites/default/files/publications/2019_04_AVR_Report_Final_0.pdf
[114] http://www.ilga.gov/legislation/ilcs/documents/001000050K1A-16.1.htm
[115] https://codes.findlaw.com/md/election-law/md-code-elec-law-sect-3-203.html

Michigan State Constitution § 4 (1)(d). Place and manner of elections. Michigan Compiled Laws 168.493a. Automatic voter registration; qualifications; option to opt-out; information added to qualified voter file; erroneous registration not a violation.[116] Michigan constitutionally guarantees the right to be automatically registered to vote at the DMV. Most DMV interactions will lead to automatic voter registration or registration address updates unless the voter opts out or is not a citizen.

Oregon Revised Statutes 247.017. Transfer of voter registration materials to Secretary of State from Department of Transportation; opt-out of voter registration; rules.[117] The DMV provides the secretary of state with voter information including the electronic signature of every voter that qualifies to vote. County clerks then notify voters to allow voters to opt out or register a political party affiliation.

Example Guidance Language:

- Georgia and Colorado launched automatic voter registration without state legislation.[118] Georgia initiated automatic voter registration by updating its drivers registration form in 2016.[119] The Department of Driver Services forwards new voter registration and information for updating purposes to the Secretary of State.
- Colorado administratively rolled out automatic voter registration at DMV locations in 2017. Colorado's automatic voter registration and updates can be seen in the license renewal and change of address forms.[120] As of 2019, the Department of Health Care Policy and Financing is statutorily required to transmit voter registration information to the Secretary of State.[121]

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[116] http://www.legislature.mi.gov/(S(2hthlf15z4s0fhn5famvyrgo))/mileg.aspx?page=get Object&objectName=mcl-168-493a

[117] https://www.oregonlegislature.gov/bills_laws/ors/ors247.html

[118] https://www.ajc.com/news/state--regional-govt--politics/automatic-registration-leads-surge-new-georgia-voters/97PMHrv8anlB66TfKdlUtK/

[119] https://dds.georgia.gov/sites/dds.georgia.gov/files/related_files/document/MAIL%20IN%20 RENEWAL%20PACKET%20-%20February%202019%20UPD.pdf

[120] https://www.colorado.gov/pacific/dmv/forms-licenses

[121] https://casetext.com/statute/colorado-revised-statutes/title-1-elections/general-primary-recall-and-congressional-vacancy-elections/article-2-qualifications-and-registration-of-electors/part-5-mail-registration-and-registrationat-voter-registration-agencies/section-1-2-5025-transfer-of-voter-registration-information-to-secretary-of-state