



VOTE AT HOME SCALE PLAN

BACKGROUND

A. Introduction and Context

The coronavirus is impacting every facet of American life at the moment. Elections are certainly not immune: candidates have canceled rallies; the recent Democratic presidential debate in Washington, DC did not have a live audience; primary elections are being postponed; and election officials are preparing for the unique and unprecedented challenge of conducting a Presidential election in the midst of a pandemic.

Our election system is uniquely vulnerable to the current threat. This is in part due to the historical reliance on the in-person voting processes at government assigned locations that require a large number of people to manage. A majority of poll workers in the 2016 election were over the age of 60, placing them in the category most affected by covid-19. Moreover, retirement homes and assisted living facilities are often used as polling sites. A number of states have already begun making emergency relocations to avoid the risk of infection. The closure of polling places due to contamination, travel restrictions, or voters' reluctance to enter crowded environments could all restrict the ability to vote in-person.

This new challenge requires not just temporary fixes to address pieces of the puzzle, but action at the systems-change level. We believe that a massive scale-up in voting at home policies and infrastructure can provide a timely and effective way to help ensure the security and efficacy of American elections in the face of such a threat.

We know from experience, voting at home (VAH), also referred to as voting by mail (VBM), offers a safe, secure, time-tested way to make voting more accessible while reducing the administrative and staffing burden on election day. It builds upon structures that already exist in every state — absentee ballots — which makes it, if not convenient, then at least feasible, to scale up in the relatively short span of time before the November elections.

Expanded voting by mail is not by any means a panacea. While there are changes that can be made at every level, it may not be the right answer for every state. Context is everything.

Some states that are already all VAH or mostly VAH are prepared to move forward and would need only slight adjustments to their current structure. These states include California (not all counties yet), Colorado, Oregon, Washington, Hawaii, and Utah. Montana and Arizona already have a large majority of voters that vote by mail so they are ready with the infrastructure to enact a vote at home system for all voters. The recommendation for these states is therefore to work with Governors, Secretaries of State, legislators, and election administrators to move to a full vote at home system as expeditiously as possible.

That leaves 42 states that would need at least some infrastructural changes in order to move to a vote at home system. Crucially, states that are currently step 1 or 2 in the VAH status (Fig. 1) — that

is, they still require an excuse to request an absentee ballot — should immediately pass legislation to allow any voter to sign-up to receive a mail ballot in any election and to allow for permanent absentee status so that they can remain signed up for future elections. If passing legislation is not an option, these states should consider an emergency Executive Order, or rulemaking where appropriate, to implement no excuse absentee voting options (see National Governors Association Report [assessing Governors' legal authority](#) to change and issue regulations during declared emergencies).

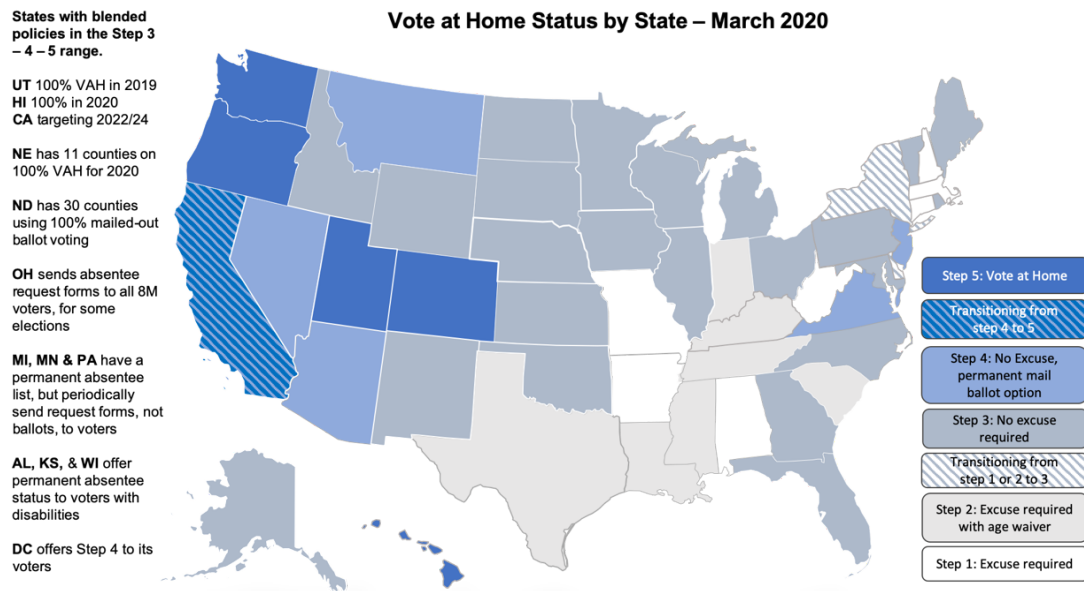


Fig. 1: State Map Indicating Vote at Home Status (source: National Vote at Home Institute)

There are a number of considerations necessary to make this happen in time for upcoming primary elections and the November election. This memo addresses options and includes an actionable plan with estimated costs. *Considering the time necessary to order and set up required equipment and other infrastructure, we believe a decision needs to be made by April 15 or sooner to make this happen in various states ahead of the November election. However, for states considering changes before their upcoming primaries, they must act as soon as possible.*

B. Paths to Implementation for States:

Option 1: Mail ballots to all eligible voters with pre-paid postage for return, while increasing drop-off locations and retaining some level of in-person voting options. In-person options may continue to change depending on the public health risk. Extend acceptance of postmarks to ensure voted ballots are accepted.

Option 2: Under existing laws, expand the use of vote by mail by educating voters on their options with a multi-modal outreach campaign. Provide voters with expanded options to request a mail-in ballot either online, by phone, by email, or with a physical paper application. Increase or institute ballot drop-off locations and require pre-paid postage for return envelopes. Accept voted mail ballots at any



voting location and extend acceptance of a postmark to ensure voted ballots are accepted. Maintain in-person voting options.

Option 3: In some cases, states may need to pass emergency legislation and/or rulemaking to implement no excuse absentee voting. Provide voters with expanded options to request a mail-in ballot either online, by phone, by email, or with a physical paper application. Increase or institute ballot drop-off locations and require pre-paid postage for return envelopes. Accept voted mail ballots at any voting location and extend acceptance of a postmark to ensure voted ballots are accepted. Maintain in-person voting options.

With all 3 options, we recommend that states:

1. Anticipate and plan for infrastructure and equipment needs (Refer to next section for a plan to coordinate a centralized or regionalized process);
2. Utilize [clear ballot and envelope design](#);
3. Review and adjust timelines for mailing ballots to provide consistency statewide;
4. Coordinate with USPS as soon as possible and utilize resources for [election officials](#);
5. Implement [ballot tracking](#) utilizing intelligent mail barcodes;
6. Leverage best practices for replacement ballots;
7. Streamline signature verification processes and ensure that bi-partisan teams make the final decisions. Assess signature image quality in advance for entire voter file;
8. Develop and expand signature cure processes and ensure adequate post-election timelines for a voter to cure;
9. Improve voter registration address change processes while maintaining accountability and oversight; and
10. Increase availability for electronic delivery options for voters with accessible needs and inform voters of their options appropriately.



IMPLEMENT OR EXPAND VOTE AT HOME OPTIONS:

CENTRALIZED OPERATION

NVAHI proposes that a feasible way to scale for the necessary volume of voting by mail for upcoming elections and in advance of the November election is to centralize or regionalize vote by mail operations, especially in states with a lack of infrastructure at the local level. There may be a few exceptions to this in states that already have particularly large amounts of vote by mail, since their local jurisdictions may be able to absorb a significant increase in the use of vote by mail ballots. However, due to the compressed timeline, infrastructure requirements, and potential workforce shortages, this may be the best option for a state to consider.

For example, a state like Georgia, that has recently modernized their voting system by deploying a statewide single vendor system, is well-positioned to centralize their vote by mail process to take the burden off of local officials. Michigan, Pennsylvania, New York, Louisiana, and other states with a lack of local infrastructure may also be good examples of where this plan would work well. A strategy for centralization or building up a larger regional or local operation is as follows:

I. Centralize Vote by Mail Operations:

A. Outbound Mail Ballot Process to include design, printing, preparation, and mailing of all ballots:

1. Design and program all VBM ballots for all counties/cities at the state level. So, one template, one ballot design for all jurisdictions. In some cases that may mean that a state would use the dominant or major voting system vendor to layout and design all VBM ballots for all jurisdictions. Local officials could still use the system they already have for their in-person voting process. Results can be combined for results reporting.
2. Design all mail ballot envelopes at the state level so that there is one envelope with one return address (for return to a central location), with the same instructions for all voters across the state. Many states have already started to move in this direction. The Center for Civic Design has a recommended template based on usability testing and states like California and Michigan have already adopted this as a statewide template.
3. State (or a collection of counties) can contract with a vendor to mail all ballots to all voters. It is more efficient for a vendor to work with the state to get the voter file than many individual localities. Centralized print operations could be established within a state without using a 3rd party vendor. Orange County, CA for example prints and mails their own ballots.
4. Provide pre-paid postage for every voter. Federal allocation of dollars can assist and our recommendation is that a federal indicia be created for all domestic ballots. Creating a federal indicia so that the postage bill for outbound and inbound mail ballots is billed directly to the Federal Government would make the payment process more efficient across all states and local election offices. It is exactly the same process as what is currently in place for military and overseas voters.



5. Coordinate with USPS: Develop a working group with county officials; formulate a schedule, review postal regulations; utilize intelligent mail barcodes; coordinate ballot tracking, and leverage cost efficiency with high-volume rates.
6. Work with USPS to implement a communications plan to deliver a notice to each customer to register to vote, update their registration in advance, and provide a reminder to keep addresses current.
7. Implement ballot tracking so that every voter can track their mail ballot to increase accountability and transparency. There are a few tools available to do this now.
8. Offer an accessible vote at home option for voters who are overseas and for voters who need to use assistive technology at home to complete the ballot. States like California and Utah both have legislative language on this topic.

B. Inbound Mail Ballot Process to include ballot receiving, ballot sorting, ballot verification, ballot preparation, ballot scanning, and ballot tabulation.

1. Allocate one return address for all ballots in a state. The return address (or PO Box) on each mail ballot would be the same for every voter in a state. Voters can return their ballot via USPS with prepaid postage, to a secure 24/7 drop box, to temporary drop-off location, to a drive-up drop-off location, or in person at any voting location.
2. Process all inbound ballots using high-volume sorting equipment. As an example, Orange County, CA provided this [video](#).
3. Conduct signature verification using software available on the ballot sorting equipment. Utilize best practices for signature verification including a bi-partisan review team. Colorado's Signature Verification Guide is [here](#).
4. Prep all validated ballots for scanning. This includes extracting the ballot from the envelopes while preserving voter privacy. Equipment can assist with this process as well.
5. Scan all ballots on central count scanning equipment. This equipment would be provided by the vendor who lays out the ballot.
6. Set-up 24/7 camera surveillance, stream the ballot operations online, and set up space that provides for full transparency for watchers and observers while adhering to security standards.
7. Conduct a risk-limiting, post-election audit. A centralized scanning environment allows officials to perform a ballot comparison audit.

II. Election Process – High Level

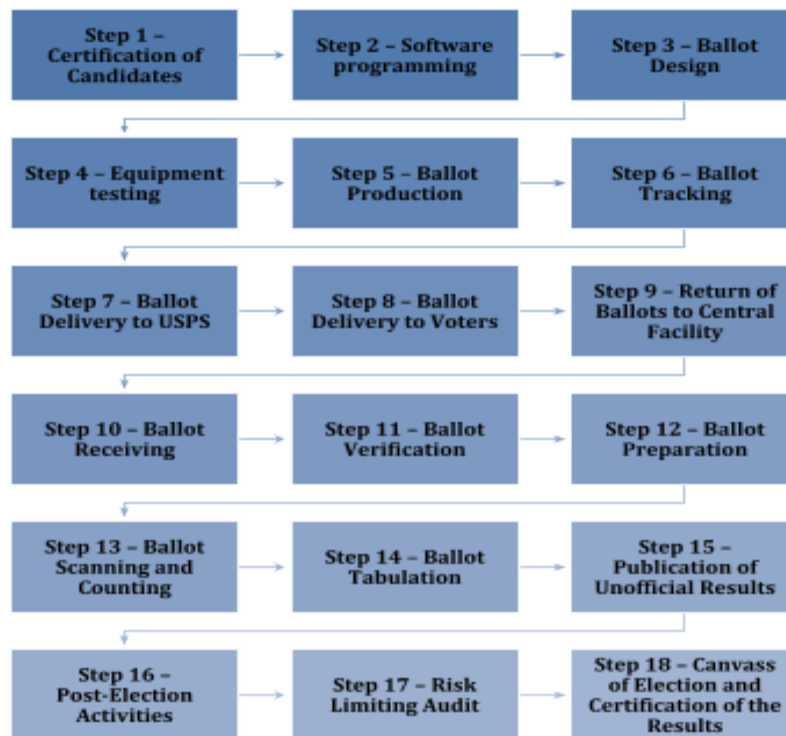


Fig 2: Flow Chart of Vote by Mail Process (source: National Vote at Home Institute)

III. Logistics, Operations, Vendors, & Infrastructure

A. Plan a central processing operation

1. Secure a large facility in a central place in the state or in multiple regions within the state.
2. Design the layout and space for optimal efficiency, transparency, and infrastructure requirements. NVAHI will work with states and vendors to provide optimal layout and design.
3. Design physical and technical security to adhere to all federal and state laws for critical infrastructure. This includes controlled access, intrusion incident response, surveillance cameras, and scheduled audits of authorized personnel for appropriate level of access.
4. Implement background checks for anyone who supports or accesses the facility. Utilize best practices with the highest standard for ensuring security.
5. Design the facility to provide the highest level of transparency for election observers and watchers.
6. Implement 24/7 video monitoring of all ballot processing areas.

B. Procurement

1. Set requirements to include establishing the central processing center, voting system services (including ballot design and programming), ballot production, mailing and printing, ballot tracking, ballot receiving, ballot sorting and verification, ballot counting and tabulation, and post-election auditing.



2. Determine the voting system vendor (if not a statewide voting system vendor, choose the vendor with the most counties). The voting system vendor could subcontract to provide the additional ballot processing elements listed above or a state could contract directly with the providers of ballot sorting equipment as an example. NVAHI can provide guidance on vendor selection and vendor contact information.
3. Expedite contracts to ensure work can begin immediately.
4. Create a project team for each state with national coordination. NVAHI is putting together a team to help support states and local election offices on this expansion.

IV. Voter Education

- A. Since its inception, NVAHI has worked in lockstep with local and national voter education organizations, and feedback from the voter education community has been essential to our work. For this effort to be successful, outreach efforts must incorporate culturally-competent best practices, and be mindful of historical barriers to the ballot. NVAHI aims to expand upon that role as trusted messenger to ensure national and local voter engagement organizations have a go-to and reliable resource. As voter engagement programs move forward, we aim to provide guidance for proactive voter education campaigns through community engagement and via tactics like mail and digital marketing to encourage early ballot return and address verification. We can also facilitate education in tandem with ballot delivery so that voters receive a well-designed ballot with instructions notifying them of the process. Both measures are essential to increasing participation and closing the loop from ballot delivery to return.
- B. Key elements for a voter education campaign (run by a state and/or coordinated with nonpartisan voter education efforts organizations) to include the following:
 1. Advise voters to register to vote well in advance of the election and update their address.
 2. Advise voters to ensure their mailing address is current now and at least one month before ballots are mailed.
 3. Send a notice to voters on multi-channels and perhaps through USPS.
- C. Develop digital marketing strategy to reach voters across all platforms.
- D. Design consistent statewide voter instructions to be mailed with ballots that are clear, concise, and tell the voter exactly what to do. Design and adopt a template in coordination with the Center for Civic Design.



- V. **Budget** - This is an estimate for a state like Michigan to implement a centralized plan and includes all that is needed to mail every voter a ballot, the operational costs to process them, and infrastructure updates. States will vary but this gives an example.

| Totals | Summary |
|--------------------------------|---------------------|
| Facility | \$1,475,000 |
| Infrastructure | \$14,150,000 |
| Ballot Mailing - 2020 November | \$18,225,000 |
| Voter Education | \$2,000,000 |
| Professional Services | \$500,000 |
| Employee Costs | \$1,500,000 |
| Total Costs | \$37,850,000 |

Fig. 3: Cost estimate for the vote at home innovation for the state of Michigan (source: National Vote at Home Institute)

IMPLEMENT OR EXPAND VOTE AT HOME OPTIONS: LOCALIZED OPERATION

States may opt to expand the use of vote by mail options under existing laws with some modifications for the states that still require an excuse. The obvious advantage is that it can be done now and under existing laws in most states. However, NVAHI believes there are some challenges to this approach. These include:

1. Most states with low usage of VBM do not have the infrastructure in place to deal with large volumes of mail ballot applications or mail ballots.
2. The process to make the request can be inefficient and thus, expanding the volume of applications by voters will add burdens and increase costs for local jurisdictions.
3. This process relies heavily on humans and is prone to human error. So, at the local level, if staffing shortages occur, it will slow the process to process applications, backlog counties and cities and delay ballots being mailed to voters.
4. Many jurisdictions do not use a mail ballot print vendor and instead manually mail the ballots, which is prone to error, expensive, and could induce delays.

Thus, expanding vote by mail options under existing laws (with some modifications) and at the local level will require the following actions:

1. Increase drop box locations and/or utilize drive-up drop off locations.
2. Maintain centralized vote centers or polling places.
3. Increase online access to request an absentee ballot, to resolve issues like replacement ballots, and for voter registration changes. Review current process for address updates to ensure address lists are as accurate as possible.



4. Provide pre-paid postage for all voters.
5. Offer an accessible vote at home option for voters who are overseas and for voters who need to use assistive technology at home to complete the ballot. States like California and Utah both have legislative language on this topic.
6. Utilize best practices for signature verification including a bi-partisan review team. Create standards applicable across all jurisdictions. As an example, Colorado's Signature Verification Guide is [here](#).
7. Assess equipment and infrastructure needs immediately and talk with vendors about how best to deploy high volume scanning equipment. This depends on the size of the jurisdiction and expected returns.

I. Voter Education for the Localized Option

NVAHI can create a proactive voter education campaign through mail and digital marketing to encourage early ballot return and address verification. We can also facilitate education in tandem with ballot delivery so that voters receive a well-designed ballot with instructions notifying them of the process. Both measures are essential to increasing participation and closing the loop from ballot delivery to return.

- A. Key elements for a voter education campaign (run by a state and/or coordinated with nonprofit organizations) to include the following:
 1. Advise voters to register to vote well in advance of the election and update their address.
 2. Advise voters to ensure their mailing address is current now and at least one month before ballots are mailed.
 3. Send a notice to voters on multi-channels and perhaps through USPS.
 4. Mail an application to every voter statewide. (similar to Ohio).
 5. Send a mailing within a local jurisdiction (in addition to or in lieu of a statewide mailing). NVAHI and partners can help with guidance to design materials.
- B. Implement a digital marketing and traditional media effort to educate voters on registering to vote, updating their address, and signing up for a mail ballot.
- C. Use the ballot packet as a notice to voters with clear instructions.
 1. Design instructions to be mailed with ballots that are clear, concise, and tell the voter exactly what to do.
 2. Design and adopt a template for instructions in coordination with the Center for Civic Design.

II. Emergency Order/Declaration

- A. The governors in each state should assess their legal authority to enact procedures around expanding vote by mail options.
- B. Reference Report [Assessing Legal Authority](#)

1. This [article](#) outlines the findings of the assessment, which identified 35 states that explicitly permit governors to suspend or amend both statutes and regulations; 7 states in which governors are permitted to amend regulations during a declared emergency but are not explicitly authorized to modify or remove statutes; and 8 states and the District of Columbia that provide no explicit authority to governors to change statutes or regulations during a declared emergency.

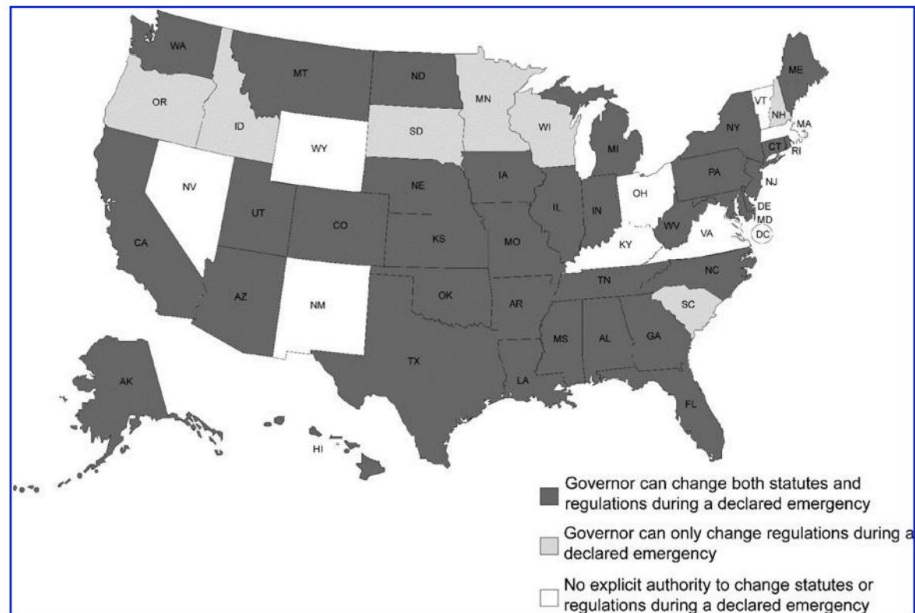


Fig. 4: States that explicitly authorize governors to change statutes or regulations during a declared emergency (source: National Governors Association)



ADDITIONAL RESOURCES

- [National Association of Secretaries of State \(NASS\) Report \(2017\)](#)
- [National Conference of State Legislatures \(NCSL\) summary of state-by-state mailed-out ballot policies](#)
- [National Governors Association \(NGA\) Report: Legal Authority of Governors to Remove Barriers](#)
- [NVAHI Webinar series for elections officials \(with the Center for Tech & Civic Life and the Center for Civic Design\)](#)
- [National Vote at Home Institute \(NVAHI\) Reference Library](#)
- [NVAHI Annual Report \(2019\)](#)
- [NVAHI Policy & Research Guide](#)
- [Ballot Processing Example: Orange County](#)
- [Ballot Cycle Steps: Denver Elections](#)
- [Voter Education on Vote Centers: Orange County](#)
- [Electionmail.org Assistance with any USPS issues](#)
- [Signature verification training guide: Colorado](#)
- [Complete vote by mail procedure manual: Oregon](#)
- [Ballots Scout's Ballot Tracking tool](#)
- [TXT2VOTE Signature verification issue "curing" tool](#)