

# ELECTION MANAGEMENT GUIDELINES

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Below are a few general guidelines for securing voting equipment during voting periods:

- · During early voting:
  - The electronic storage media and paper ballots should be secured each night in a tamper-proof location, preferably within the elections office.
  - Voting equipment should be closed, sealed, and secured at the end of each day. Record the number on all protective seals and public counters. In addition, verify seals and counters before the voting equipment is used the following day.
  - Every evening, any mobile unit containing voting equipment should be returned to the elections office and stored within a secure facility.
- If voting equipment and election supplies are delivered to the polling place by anyone other than poll managers, the poll manager(s) should verify the serial numbers of all voting equipment and necessary election supplies (ballot activation devices, administrator devices, communication equipment, closing seals, etc.).
- Voting equipment setup should be as follows:
  - Access to the voting equipment's power control, counter controls, and electronic storage media must be controlled within the voting machine and inaccessible to the voter.
  - Voting equipment should be in plain view of the poll managers at all times.
- On Election Day, a team of two poll workers (preferably bipartisan) should:
  - Verify the serial number and seal number on each voting machine and look for signs of tampering.
  - Activate the machine and verify the date, time, and public count.
  - On machines with a voter-verified paper audit trail, verify that it functions.
  - Sign-off on paperwork indicating all procedures were followed.

#### **DROP BOX SECURITY**

Election officials must include ballot drop boxes in their security plans. The Quick Start Guide: Ballot Drop Boxes highlights several tips for ensuring the security of the drop box and collection procedures.

https://www.eac.gov/sites/default/files/ electionofficials/QuickStartGuides/Ballot\_Drop\_ Boxes\_EAC\_Quick\_Start\_Guide\_508.pdf

Additionally, the EAC chaired the Elections Infrastructure Government Coordinating Council and Sector Coordinating Council's Join COVID Working Group and developed guidance on drop box security that addresses placement, security, and collection practices.

https://www.eac.gov/sites/default/files/electionofficials/vbm/Ballot\_Drop\_Box.pdf

Throughout the voting day, train workers to implement the following procedures to promote the security of the voting process:

- The area around the voting equipment must be secure at all times. Only poll workers, legally authorized personnel, and registered voters should be allowed in the voting machine or voting booth area. A voter should not be allowed to enter this area until a voting machine or booth is available for their use.
- Each poll worker should have a clearly defined role, so voters can identify them and their particular responsibilities as they move through the polling place.
- Poll workers should direct provisional voters to a separate check-in table or area to ensure provisional ballots are handled uniformly and establish ballot accountability for auditing purposes.

#### **ELECTION MANAGEMENT GUIDELINES**

There are a significant number of states that authorize the return of mail or electronically transmitted ballots by email, fax, or other electronic means such as an upload to a portal. Security procedures, chain of custody, and ballot duplication procedures in offices are determined by state law and guidance.

#### **Drop Boxes**

Election officials should review state law and regulations before using ballot drop boxes. When locating drop boxes, election officials consider population, geographic areas, security, and available funding. Election officials should consider using city and county facilities, public assistance offices, senior and community centers, locations in areas with significant minority or traditionally disenfranchised communities as drop box locations when applicable.

When determining locations and drop box placement, consider the following factors:

- · Access for voters with disabilities
- Security
- Voter convenience
- Parking

Election officials should be sure to inform voters of the location and hours of operation for all drop boxes in their jurisdiction. The EAC's **Ballot Drop Boxes Quick Start Guide** provides additional information on locating and securing drop boxes.<sup>2</sup> The Quick Start Guide and the EAC's **Best Practices: Chain of Custody** include guidelines for developing robust chain of custody procedures applicable to emptying drop boxes.<sup>3</sup> Additionally, the **Making Voting Accessible** Quick Start Guide outlines general accessibility considerations for ballot drop boxes.<sup>4</sup>

Ballot drop boxes must be locked and secure at all times. They should be placed in monitored areas or under video surveillance, whether indoor or outdoor. The drop boxes should be accessible only by a unique key, and two staff members (preferably bipartisan) should access the box to collect ballots.

Election officials should establish a predetermined collection schedule. A team of two election workers (preferably bipartisan) should transfer the voted ballots to a locked or sealed ballot box, bag, or pouch and deliver it to the elections office. On Election Day, election workers should monitor the drop box locations until the close of the polls or the deadline for ballot receipt. Two election workers (preferably bipartisan) should be assigned to lock each drop box location, collect all remaining ballots, and ensure the drop box is removed or cannot accept any additional ballots after the deadline.

#### In-Person Voting Locations

If state law allows the voter to drop off voted absentee ballots at in-person voting locations, election officials must include instructions and procedures for poll workers to use in returning these voted ballots to the central elections office. Depending on the jurisdiction, mail ballots returned to a voting location may either be scanned at the location or centrally scanned at the elections office. Poll workers must understand how to document receipt of mail ballots and track tabulation, if applicable, and return to the elections office.

#### Returned Ballot Audit Trail

Elections office staff must create an audit trail throughout the ballot reception process. Election officials should maintain logs for processing the ballots through each step. All statistical information must be maintained for each batch of ballots processed, including:

- Number of ballots received
- Number of ballots counted
- Name, team number, or persons involved
- Date and time processed
- Number of challenged ballots
- · Number of write-ins and duplicated ballots
- · Number of envelopes that do not contain a ballot
- · Number of envelopes containing more than one ballot

<sup>&</sup>lt;sup>2</sup> https://www.eac.gov/sites/default/files/electionofficials/QuickStartGuides/Ballot\_Drop\_Boxes\_EAC\_Quick\_Start\_Guide\_508.pdf

https://www.eac.gov/sites/default/files/bestpractices/Chain\_of\_Custody\_Best\_Practices.pdf

<sup>4</sup> https://www.eac.gov/sites/default/files/electionofficials/QuickStartGuides/Making\_Voting\_Accessible\_EAC\_Quick\_Start\_Guide\_508.pdf

#### **ELECTION MANAGEMENT GUIDELINES**

#### Voting Area

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



Image 19: Example of the accessible interior voting area.

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

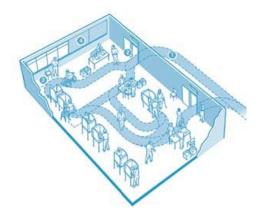


Image 20: Voting area accessibility. 1 – Accessible route connects the building entrance with the voting area, including voter check-in and accessible voting machines. 2 – Accessible door or doorway to the voting area. 3 – Turning space at the accessible voting machine. 4 – Blinds closed behind check-in so voters who read lips can communicate with the voting staff.

# **GIS and Voting Locations**

GIS is a software system for capturing, storing, and displaying data in interactive maps. In simple terms, GIS can combine different datasets such as addresses, streets, buildings, aerial photos, voting precincts, and district boundaries into a single digital map. GIS can yield great benefits by applying data visualization to assist with selecting voting and drop box locations, creating voter-specific look-up tools, displaying detailed election results and, more. GIS can also be used to increase the accuracy of voter registration systems.

## Geocoding

For accuracy, election officials can overlay several GIS datasets to examine addresses, precincts, and districts boundaries. A process known as geocoding will assign a point on the map for every address in a street file. Election officials can compare the points to other information, including precinct and district boundaries, in the GIS workspace to identify discrepancies. The comparison can be a useful tool to validate changes made to precinct and district boundaries in election management systems. See the EAC's Local Election Officials' Guide to Redistricting for additional information.<sup>2</sup>

### Selecting Polling and Drop Box Locations

GIS databases are a great tool to create efficiencies when managing voting locations. Election officials can use GIS data such as population demographics and public transportation routes to strategically locate voting locations and drop boxes in areas that are accessible to voters. Potential voting locations can also be pre-assessed by examining aerial photos of parking lots and accessible paths of travel before traveling to locations to confirm they meet accessibility requirements.

#### Voting Location Look-up Tools

Helping people find their voting location is an essential part of election administration. Election officials can use GIS to create address-specific look-up tools like other familiar map applications. The look-up tool's configuration can include

https://www.eac.gov/sites/default/files/2021-08/LEO\_Guide\_to\_Redistricting.pdf

About the Quick Start Guides: The EAC's Quick Start Guides are intended to familiarize local election officials with various topics they will likely encounter in election administration. The guides are a starting point to identify areas of concern and give officials a

### **Utilizing Drop Boxes**

In jurisdictions that permit ballot drop boxes, election officials must address several considerations before deploying drop boxes. First, they must familiarize themselves with state law and regulatory requirements. Some states only permit drop boxes in certain locations or with specific security measures. Drop boxes also come with additional costs, including staff to empty the boxes daily, hardware, security seals and locks, ballot containers, and other security equipment.

broad idea of factors they should consider in approaching a given topic.



#### Locations

- Follow state statutes on required or permissible locations for the installation of drop boxes.
- Use demographic data to determine whether there should be a different formula for placing drop boxes in rural or urban locations (i.e., 1 for every 15,000 residents might be every mile in an urban area, but every 50 miles in a rural area).
- Choose a location that is accessible by public transportation (where available).
- Avoid locations that can be obstructed by high traffic events.
- Ensure the drop box is clearly visible and the path to it is accessible with a 30 inch by 48 inch minimum clear and level ground space in front.
- Publish Public Service Announcements on radio and in local newspapers, and share drop box locations on social media.
- Provide a list or map of drop box locations on your website and with mail ballot voting instructions.

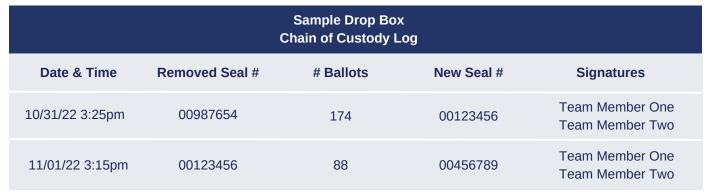
**Ballot Return Deadline** Election officials must ensure teams are present at each drop box as the ballot return deadline passes. Teams must allow any voters in line by the deadline to deposit their ballots, then collect all ballots, and lock the box so no additional ballots can be deposited.







- Provide local law enforcement a map of drop box locations and request extra patrols.
- Ensure the area is well lit and any unsupervised drop boxes have video surveillance.
- Implement rigorous chain of custody procedures. For each drop box, teams should record the time and date emptied, verify the box's seal number, document the number of ballots retrieved, reseal the drop box, and seal the ballot container.
- Track the return of drop boxes after the ballot return deadline passes to ensure all drop boxes are emptied and ballots collected are included in election night unofficial results.



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This document is one in a series created as part of the Cybersecurity and Infrastructure Security Agency (CISA) Elections Infrastructure Government Coordinating Council and Sector 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.

# **Ballot Drop Box**

# Overview

A ballot drop box provides a secure and convenient means for voters to return their mail ballot. A drop box is a secure, locked structure operated by election officials where voters may deliver their ballots from the time they receive them in the mail up to the time polls close on Election Day. Ballot drop boxes can be staffed or unstaffed, temporary or permanent.

Unstaffed drop boxes are typically available 24 hours a day and permanently anchored in place. Staffed drop boxes are typically available during regular business hours and monitored by trained workers during those hours.

Whether you are standing up a temporary vote-by-mail program statewide or locally, or you plan to develop a permanent program of voting primarily by mail, there are a few things to know and consider when planning for the use of ballot drop boxes.

# **General Considerations**

# Why do you need ballot drop-off locations when you are paying for return postage?

Some voters prefer to deliver their mail ballots to a drop box rather than sending them back through the mail. These voters may be motivated by lack of trust in the postal process, fear that their ballot could be tampered with, or concern that their signature will be exposed. Voters may also be concerned about meeting the postmark deadline and ensuring that their ballot is returned in time to be counted.

Ballot drop boxes and drop-off locations allow voters to deliver their ballots in person. More importantly, the availability of ballot drop boxes and drop-off locations ensures that even voters who wait until the last minute to vote or who receive their requested ballot in the mail at the last minute will be able to return their ballots in time to be counted.

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Many of these last-minute voters drop their ballot off at a voting location (which may not be allowed by state law). Setting up ballot drop boxes and educating voters to use them mitigates a number of COVID-19-related risks associated with in-person voting. It also minimizes the number of people that will need to access voting locations, thereby providing more space for those who are engaged in in-person voting.

# How many ballot drop boxes will you need?

At a minimum, you should have a drop box at your main county or city office building. Voters generally know the locations of these buildings and are already accustomed to voting or doing business there. Some other best practices include:

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Have one drop box for every 15,000–20,000 registered voters.
Consider adding more drop boxes to areas where there may be communities with historically low vote by mail usage.
Use demographic data and analysis to determine whether there should be a different formula for rural and urban locations (i.e., 1 for every 15,000 residents may be every mile in an urban are, but every 50 miles in a rural area).

To get a better idea of how many voters use ballot drop boxes when voting by mail is the primary method of voting, look at the <u>Ballot Drop Box Usage</u> chart put together by the Washington Secretary of State. It shows ballot drop box use as a percentage of total ballots returned for Washington state, where voting by mail has been the primary method of voting for over a decade.

Timeline: The number of drop boxes and their locations should be finalized in time to be included in the instructions with your mail ballot packet—typically 80 days before the election.

# Where should ballot drop boxes be located?

Ballot drop boxes should be placed in convenient, accessible locations, including places close to public transportation routes, near or on college campuses, and public buildings, such as libraries and community centers familiar to voters and easy to find. If there is time, getting input from citizens and community groups is recommended.

All drop box locations should be evaluated for:

Security
Lighting (well-lit 24 hours a day)
High visibility
Security cameras (more on cameras in the Security Considerations section below)
Accessibility
Voter convenience
Parking or drive-through options

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There are tools that can help you evaluate locations for drop boxes. The <u>U.S. Census Bureau Interactive Workforce Map</u> is a tool that can help you visualize where residents of your jurisdiction work or live to help you see where drop boxes might be particularly useful. Also, the Federal Emergency Management Agency (FEMA) is offering free enterprise-level access to <u>ESRI geospatial mapping software</u> for all state, local, territorial, and tribal governments for 6 months.

In a COVID-19 environment, creative solutions may be required. Consider:
☐ Collocating a ballot drop box with drop boxes set up for taxes and public utilities.
☐ Partnering with businesses or locations that have already implemented social distancing
practices, such as grocery stores and banks.

A great example of using existing spaces comes from <u>Madison, Wisconsin</u>. The city's libraries were shut down owing to COVID-19. The City Clerk's office decided to capitalize on locations that were already secure and located in places familiar to city residents. Working in partnership with the library, they used the book drops from three of the city's public libraries and turned them into temporary ballot drop boxes. If you choose to do something similar, be sure to ask questions about the library's security to ensure ballots dropped off at library locations remain secure at all times.

Timeline: The locations of drop boxes should be finalized in time to be included in the instructions with your mail ballot packet—typically 80 days before the election.

# Who can collect and drop off a mailed ballot on behalf of a voter?

Voters who are unable to return a ballot in person or get it to a postal facility in time for it to be counted may, depending on state law, may be able to entrust the voted ballot to someone else to help them deliver it—an agent or designee. Note that, as of March 30, 2020:

- Twenty-seven states permit an absentee ballot to be returned by a designated agent, which can be a family member, attorney, or care provider.
- Nine states permit an absentee ballot to be returned by the voter's family member.
- One state specifies that an absentee ballot can only be returned in person or by mail.
- Thirteen states do not expressly address this issue.

Some states that allow a designated agent to return a voted ballot on behalf of the voter restrict the number of ballots that can be deposited by that person at one time in a drop box.

If you are considering the use of ballot drop boxes, you should review your existing laws and requirements and determine whether emergency changes may be necessary. A full list of state practices can be found at the National Conference of State Legislators (NCSL) website listed in the *Additional Resources* section.

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# What equipment and supplies are needed for ballot drop boxes?

Whether you are collecting ballots just from a USPS facility, ballot drop boxes, or both, you will need ballot drop box collection teams. Ideally, these are bipartisan teams (poll workers or temporary workers) hired to drive a collection route and pick up ballots on a regular basis. Each of these teams will need:

Vehicle such as a van or SUV where the seats can be laid flat (county owned or rented)
Radio or cell phone
Secure ballot collection bag/box
Security seals
Chain of custody procedures/forms
Personal protective equipment (e.g. disposable, sterile gloves), as appropriate and in accordance to current CDC guidance

Timeline: Reservations should be made as soon as possible if you plan to rent vehicles, radios, or cell phones—no later than 35 days before the election.

Outlined below is a list of the typical items you will need to rent or buy, depending on the type of drop box or drop-off location you are installing.

#### STAFFED - INDOOR TEMPORARY BALLOT DROP BOX

When demand for a ballot drop box is low, a temporary ballot box located inside is a good solution. These boxes should be constructed of durable material and include a key or combination lock as well as a way to securely fasten the box to prevent it from being moved or tampered with. This type of box looks similar to the example pictured here. In addition to purchasing or renting the **ballot box**, you will need:

Padlock and keys (if not included)
Bike chain or some other way to fasten the box to prevent it
from being removed (if not staffed)

Security seals

Timeline: Depending on the lead time required by the manufacturer, boxes may need to be ordered 3 months in advance—90 days before the election.



#### OUTDOOR, TEMPORARY DRIVE-THROUGH DROP OFF

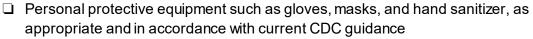
A drive-through drop-off location is an easy way to keep traffic flowing when demand for a ballot drop box is at its peak, especially on Election Day. This drive-through is typically set up in a parking lot or a street depending on the location.

The team staffing the site accepts ballots from voters as they pull through, depositing them directly into a ballot box. For voters who prefer placing the ballot directly into the box

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themselves, the portable ballot box is brought to the car window. In addition to the supplies listed below, you will need a bipartisan team of at least two to three to support the drop-off site.

- □ Table
- □ Chairs
- □ Ballot box
- □ Road signs
- Orange cones
- □ Flashlights
- ☐ High-visibility vests for workers
- ☐ Weather appropriate support propane heater, rain gear, lanterns





Timeline: Most of these items can be purchased or rented locally. You will need some lead time to arrange for traffic signs and cones if they will be borrowed from law enforcement.

#### UNSTAFFED, 24-HOUR BALLOT DROP BOX

In high-demand areas where votes are or will be cast primarily by mail, installing a permanent ballot drop box—one that can be accessed by voters 24/7—is a good solution. These boxes should be constructed of durable material such as steel and be permanently cemented into the ground. This type of **ballot drop box** typically costs about \$6,000 each. In addition to purchasing the 24-hour box you will need:

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viueu	surveillance	Calliela

- ☐ Media storage device (for recorded video)
- □ Decal (branding and information)
- ☐ Extra keys for opening slot and access door
- □ Security seals

A good example of the security considerations associated with this type of box, pictured on the right, can be found in the **California Code of Regulations**.

Timeline: Depending on the lead time required by the manufacturer, boxes may need to be ordered 4–6 months in advance—about 150 days before the election.

# **Election Night and Closing Boxes**

You need to give special consideration to returning temporary ballot drop boxes and locking permanent drop boxes on election night. Organizing teams from other county or city departments is one way to accomplish this. Essentially, you need bipartisan teams to be at every ballot drop-off location precisely when polls close. Their responsibilities include:

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Identifying the voter or car in line at the time polls close and ensuring they have the
opportunity to deposit their ballots.
Retrieving the temporary indoor boxes and returning them to the counting facility.
Locking the drop slot on the 24-hour boxes and transferring ballots to a ballot transfer
bag or box and returning them to the counting facility.
Completing chain of custody forms.

# **Security Considerations**

Ballot drop boxes must be secured and locked at all times. Only an election official or a designated ballot drop box collection team should have access to the keys and/or combination of the lock. In addition to locks, all drop boxes should be sealed with one or more tamper evident seals.

Ideally, unstaffed 24-hour drop boxes should be located in areas with good lighting and be monitored by video surveillance cameras. When this is not feasible, positioning the box close to a nearby camera is a good option. Also consider placing it in a high traffic area and inviting local law enforcement to make regular observations.

Try to place indoor drop boxes in locations where they can be monitored by a live person. When ballot boxes are unstaffed and not being monitored, the box should be securely fastened to a stationary surface or immovable object in a way that prevents moving or tampering.

# Chain of Custody

Chain of custody logs must be completed every time ballots are collected.
All ballot collection boxes/bags should be numbered to ensure all boxes are returned at
the end of the shift, day, and on election night.
Team members should sign the log and record the date and time, security seal number at opening, and security seal number when the box is locked and sealed again.

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- ☐ For drive-through locations, coordinate a traffic plan with public safety officials.
- ☐ Consider colored vests for ballot collection teams.
- ☐ Provide a radio or cell phone so you can stay in contact with collection teams at all times.

# Other Considerations

Start thinking about a ballot collection plan. This should include:

- ☐ Arranging with the USPS to designate a daily collection point for returned ballots and undelivered ballots.
- ☐ Hiring bipartisan teams with clean driving records (review your jurisdiction's requirements for driving as an employee).
- ☐ Determining the frequency of collection prior to Election Day.
- ☐ Determining the frequency of collection on Election Day.
- ☐ Ensuring you have collection teams assigned to be at each location when polls close on Election Day.
- ☐ Establishing best practices for transferring ballots back to the counting facility.
- ☐ Preparing driving routes and accompanying maps or directions.
- ☐ Determining how to keep collection teams and other staff safe in a COVID-19 environment.
- ☐ Reviewing your state laws regarding electioneering, campaigning, petition signature gathering, etc. at or near a ballot drop-off site.
- □ Developing a plan for helping voters find ballot drop-off locations. This can include a list of locations in the mail ballot packet as well as an online lookup tool with maps and directions. Two examples are <a href="Lewis County">Lewis County</a>, <a href="WA">WA</a> (rural county) and <a href="King County">King County</a>, <a href="WA">WA</a> (large urban county).

# **Additional Resources**

- ☐ Ballot Drop Box Retrieval Training Presentation—A good overview of the ballot collection process from the Orange County (California) Registrar of Voters
- Open Mic Session Ballot Drop Boxes—video that reviews best practices for ballot drop boxes in Washington State
- ☐ Voting Outside the Polling Place: Absentee, All-Mail and other Voting at Home
  Options—NCSL website dedicated to absentee voting and all-mail voting