



Feasibility Study

California Voter's Choice Act – Vote Center Model

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Executive Summary

On July 9, 2019, the Board of Supervisors requested a Vote Center Model feasibility study for San Diego County. Specifically, the request included a study on conducting elections under the Vote Center Model which incorporates security, staffing, siting of the centers, voter fraud prevention and a comparative cost analysis between the existing neighborhood Polling Place Model, the Vote Center Model and an All-Mail Ballot Model. In addition, the Board requested an implementation plan for the 2020 election cycle to establish pilot vote centers and a feasibility study on conducting an independent audit of the San Diego County voter registration list.

As the Registrar of Voters (ROV) studied the Vote Center Model and compared it against the current Polling Place Model, it became clear that there are trade-offs. Where nearly three-quarters of county voters currently receive a mail ballot, all would receive a mail ballot in a Vote Center Model. In addition, there would be approximately double the number of mail ballot drop-off locations currently established. Where ROV has nearly 1,600 polling places on one day (election day) and each voter is assigned to one of these locations, in a Vote Center Model there would be a minimum of 179 vote centers - some open for as long as 11 days - and voters may freely go to any of the locations most convenient to them to vote.

Administratively, ROV would trade the time intensive nature of recruiting and training over 8,000 poll workers who serve for one day for the time intensive aspect of recruiting and training 2,500 seasonal election workers who would need to possess more technical skills and work over multiple days. Instead of using sites throughout the county for one day, strategically placed vote centers would need to be larger in size and made available for at least 14 days to accommodate setup, the voting period, and the break down and pickup of all voting equipment and supplies post-election.

Both the Polling Place Model and Vote Center Model are viable. It would be far too easy to try to speak about the merits of one over the other; however, one must look at both models as a whole and weigh it against how today's San Diego County voters are behaving and how external policies and variables are influencing their experience. This is how the Study has been laid out.

This Study provides an in-depth look at how elections are currently conducted in the County's Polling Place Model and then recognizes how state voter-focused laws are placing more pressures on the administration of elections. Only after fully understanding these two important aspects, the Study then focuses on the feasibility of the Vote Center Model.

As the local election official for the county, it is enticing to see the benefits of the Vote Center Model. Uniformity across all locations, consistency of training, alignment toward San Diego's shift to mail balloting, security equal to a Polling Place Model and ability to better manage conditional voter registration (CVR), are all alluring. For voters, more voting options will be made available as every eligible voter would receive a mail ballot, and those wishing to go to a voting location on election day can still do so.

However, the Vote Center Model law does overcompensate in several areas and, as requested, recommendations are provided in the Study for the Board to consider. These areas should be discussed and flagged for change during a future legislative session.

Overall, the County would benefit from further exploration of the Vote Center Model in two ways. First, to establish a recommended number of satellite locations for the 2020 election cycle. The adoption of satellite locations is necessary to address risk and concerns related to the passage of Senate Bill 72 which allows conditional voter registration at every polling place on election day. Second, analyzing the data that will be coming out from the 2020 election cycle, focusing attention on those counties that have an equally representative electorate to that of the county.

As it relates to a feasibility study on an independent audit of San Diego's voter registration list, County staff found that the scope of the audit is essential to isolating what is of concern. Perhaps more important than the scope of any audit is the awareness that the County's voter registration list is no longer locally controlled and managed as it once was. By federal law, the State's voter registration database is required to be the "single, uniform, official, centralized, interactive computerized statewide voter registration list defined, maintained, and administrated at the State level...". The County's list is in a constant state of change as a result of it being inextricably tied to the statewide voter registration database and the many agencies (e.g. the 57 remaining counties, Department of Motor Vehicles, etc.) that connect to it. In other words, the County's voter registration list is not the system of record.

The ROV will remain steadfast in its mission to ensure San Diego County voters have a system that is fair, accessible, transparent, secure, accurate and works for them. Having another voting option for the County to consider and potentially select is encouraging, particularly as the election environment is trending in a specific direction. It is understandable that exercising this new option must be thoughtful and any steps in the direction must be deliberate - San Diego's robust electorate deserve no less.



L. MICHAEL VU
Registrar of Voters

Table of Contents

THE BASICS	5
HOW IS THE VOTE CENTER MODEL DIFFERENT THAN THE TRADITIONAL POLLING PLACE & PRECINCT MODEL?	5
KEY FINDINGS	6
OUR CURRENT ENVIRONMENT	7
ORGANIZATIONAL STRUCTURE	7
REGISTERED VOTERS	7
VOTER TURNOUT	9
MAIL BALLOTING	10
PERMANENT MAIL BALLOT VOTERS	10
DECLARED MAIL BALLOT VOTERS AND ONE-TIME REQUESTS	13
MAIL BALLOT DROP-OFF (MBDO) LOCATIONS	14
POLLING PLACES	17
TECHNOLOGY	20
POLL WORKERS	20
LOGISTICS	23
LANGUAGE AND ACCESSIBILITY PROGRAMS	25
ELECTION DAY	25
OUR CHANGING ENVIRONMENT	27
CONDITIONAL VOTER REGISTRATION	27
CALIFORNIA VOTING RIGHTS ACT (CVRA)	28
REMOTE ACCESSIBLE VOTE-BY-MAIL MANDATE	28
PRE-PAID POSTAGE MANDATE	28
ASSEMBLY BILL 363 (TWO-YEAR BILL)	28
NEW VOTING SYSTEM	28
FEASIBILITY: VOTE CENTER MODEL	30
OPERATIONAL STUDY	30
ALL MAIL BALLOT ELECTION	30
MAIL BALLOT DROP-OFF LOCATIONS	30
ESTABLISHING VOTE CENTERS	31
VOTE CENTER LAYOUT – BALLOT MARKING DEVICES	34
TECHNOLOGICAL ENHANCEMENT	35
SECURITY	36
STAFFING VOTE CENTERS	37
LANGUAGE & ACCESSIBILITY PROGRAMS	39
LOGISTICS	40
ELECTION DAY	41
PROVISIONAL BALLOTS & PROCESSING	42
VOTER OUTREACH & EDUCATION	45
VOTER TURNOUT	49
COST ANALYSIS	51
ASSUMPTIONS	51
COST COMPARISON	52
FUNDING CONSIDERATION	53

FEASIBILITY - 2020 VOTE CENTER PILOT	54
ESTABLISHING SATELLITE LOCATIONS.....	54
LOCATIONS.....	54
STAFFING & TRAINING.....	59
HOURS OF OPERATION.....	59
SECURITY.....	59
EQUIPMENT & SUPPLIES	60
COST	60
RECOMMENDATIONS	61
FEASIBILITY: INDEPENDENT AUDIT OF VOTER REGISTRATION LIST	65
BACKGROUND	65
REGULATORY ANALYSIS.....	65
TECHNOLOGY REQUIREMENTS	66
FINANCIAL ANALYSIS.....	66
ORGANIZATIONAL FACTORS	66
CONCLUSIONS & RECOMMENDATIONS	66
LIST MAINTENANCE PRACTICES	67
CONCLUSION	69
APPENDIX A: VOTE CENTER MODEL (ELECTIONS CODE 4005)	I
APPENDIX B: MAIL BALLOT STATISTICS BY JURISDICTION	VIII
APPENDIX C: SATELLITE LOCATION SITING ANALYSIS	IX
APPENDIX D: SATELLITE LOCATION LAYOUT	XVI

The Basics

How is the Vote Center Model different than the traditional Polling Place & Precinct Model?

In the current polling place & precinct model (Polling Place Model), every registered voter who wishes to receive their ballot by mail must request one. A voter can make this request on an election-by-election basis or, they can choose to permanently opt-in to receiving their ballot by mail whenever there is an election that pertains to them. In San Diego County, 72% of the registered electorate are permanent mail ballot voters. In certain cases, specific voting precincts may be designated to vote by mail. Those who do not vote by mail, must visit their assigned polling place on election day or go to the ROV office in order to cast their ballot.

In a traditional Polling Place Model, each voter is assigned a specific polling place because their ballot type - set of contests a voter is eligible to vote on - has been issued to the poll workers at this polling place. Depending on the type of election (i.e. primary/general and gubernatorial/presidential) there is anywhere from 1,500 to 1,600 polling places that must be established. Due to the more than 430 political districts in the county, there are hundreds of ballot types that are required for each scheduled statewide election. When factoring in the federally required languages the County must translate voting materials, including ballots, and the qualified political party ballots during presidential primary elections, the number of ballot variations may climb as high as 10,000 to 12,000.

In addition, poll workers assigned to work at each polling place are issued a paper roster of voters which lists those eligible to cast a ballot at the polling place. In order to ensure the integrity of each election, any voter who goes to a different polling place than the one they are assigned would have to vote provisionally.

In a Vote Center Model, 100% of eligible voters receive a ballot in the mail and voting locations, known as “vote centers”, are established and opened throughout the county prior to and on election day. Some of the vote centers are open for as long as 11 days and others are open for four days. Any voter can go to any vote center for services. These services include dropping off their mail ballot, voting, registering to vote (and voting), updating their registration status, and/or receiving a replacement ballot.

To implement the Vote Center Model in accordance with the Voter’s Choice Act (Senate Bill 450), there are a number of additional requirements that must be fulfilled. These include the establishment of drop-off locations throughout the county, voter education & outreach efforts, mailings, public notices, public meetings and workshops, the formation of a Language Accessibility Advisory Committee and a Voting Accessibility Advisory Committee, and a detailed administrative plan that must be outlined and approved in advance of implementation. Appendix A provides the specific requirements under Elections Code Section 4005.

Key Findings

The Study finds that conducting elections under the Vote Center Model for the 2020 election cycle is not operationally feasible. However, it is technically, operationally and legally feasible in a future election cycle:

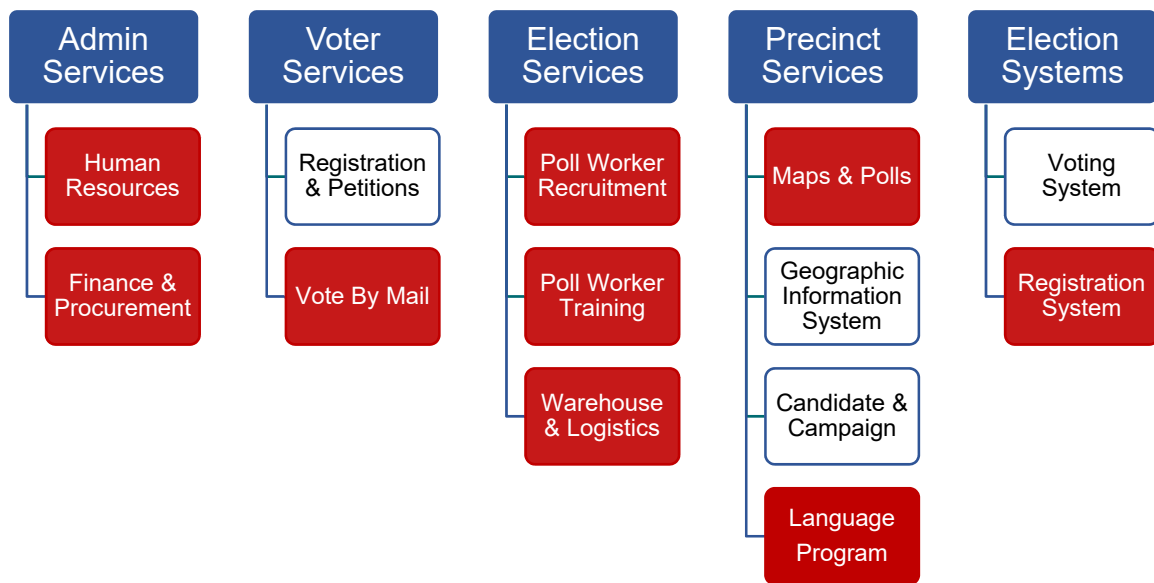
- A decision to move toward a Vote Center Model must be made giving the greatest amount of time possible in order to focus efforts in the area of human resources, siting of vote centers and voter education & outreach.
- The Vote Center Model poses less risk in the administration of elections. A more centralized and uniform model allows an election to be better monitored and managed.
- The ROV will have the capacity to manage the additional issuance and return of mail ballots.
- The on-going cost of conducting elections under the Vote Center Model is anticipated to be higher. The main contributors in the higher cost are: 1) the conversion from a poll worker stipend reimbursement structure to an hourly paid seasonal election worker structure, and 2) the increase in processing returned voted mail ballots. However, it should also be mentioned that if the County were to continue conducting elections under the traditional Polling Place Model costs will increase due to legislative changes impacting the administration of elections. New election technologies and legislative refinements would offset some of these costs in both instances.
- Attention and funding must be allocated in the area of voter education and outreach to socialize the change to voters.
- Additional security will be necessary to address the number of days vote centers are open and available. Unlike poll workers, seasonal election workers will be background checked, allowing for an additional layer of security. Many of the security measures in place in the Polling Place Model are portable to a Vote Center Model.
- The propensity of a voter who receives a mail ballot to vote is higher than a person who does not receive a mail ballot. That said, there is insufficient data at this time whether the Vote Center Model will increase voter turnout. A more representative population, similar to that of San Diego County, will better inform the County on voter turnout impacts.
- The Vote Center Model is expected to not have an adverse impact on voter turnout.
- The unincorporated area of the county has a higher adoption rate in mail balloting. Although mail ballots comprise the majority of all ballots counted, the ratio is higher in the unincorporated area of the county, in comparison to cities.

Additionally, the Study finds that conducting an independent audit of the voter registration list is not organizationally feasible. The official system of record of the voter registration list resides at the State level as required by the federal Help America Vote Act (HAVA). That said, the ROV has comprehensive practices and procedures to maintain the integrity of the voter registration list.

Our Current Environment

Organizational Structure

The Registrar of Voters (ROV) is currently structured into five divisions working in coordination to administratively conduct each election. Although the entire department would be impacted by the transition to a Vote Center Model, the highlighted sections shaded in red are ones which would experience the highest amount of change and are the focus of this study.



Registered Voters

Similar to the county's overall population, the registered voter population is the second largest in the state. The county is experiencing an all-time high of registered voters due to new State policies and the work of interest groups who are focused on registration efforts. Over the past two decades, the county has experienced a steady increase in its registered voter population. This figure represents a 25% increase over 2000 election levels.

Within the last several months, San Diego County posted its highest number of active registered voters in its history, reaching 1,806,626 voters at the end of June, before routine list maintenance procedures slightly reduced this number to 1,788,042 at the end of August 2019. Despite ongoing list maintenance, the trend of a rising number of registered voters in the county is likely to continue as new State policies and initiatives push to ensure individuals who are qualified are added to the voter rolls.

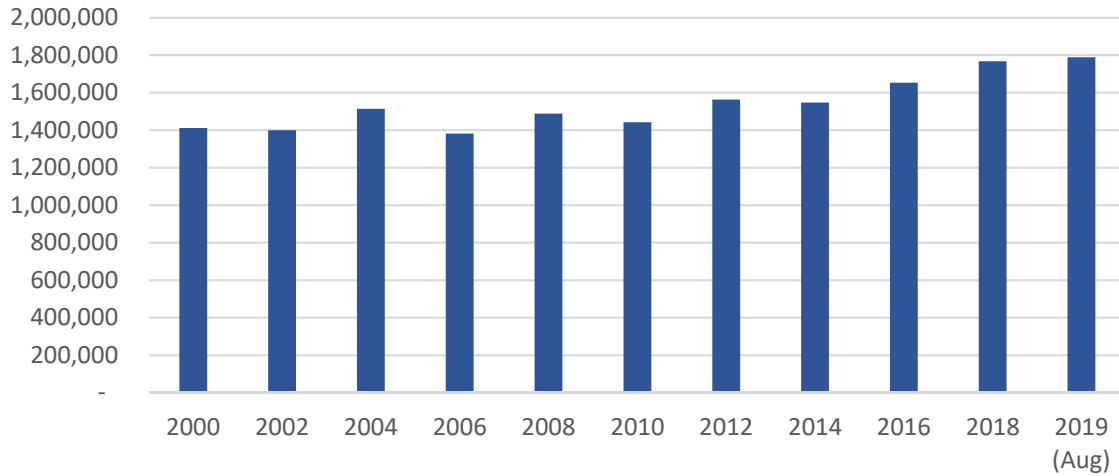


FIGURE 1 REGISTERED VOTERS

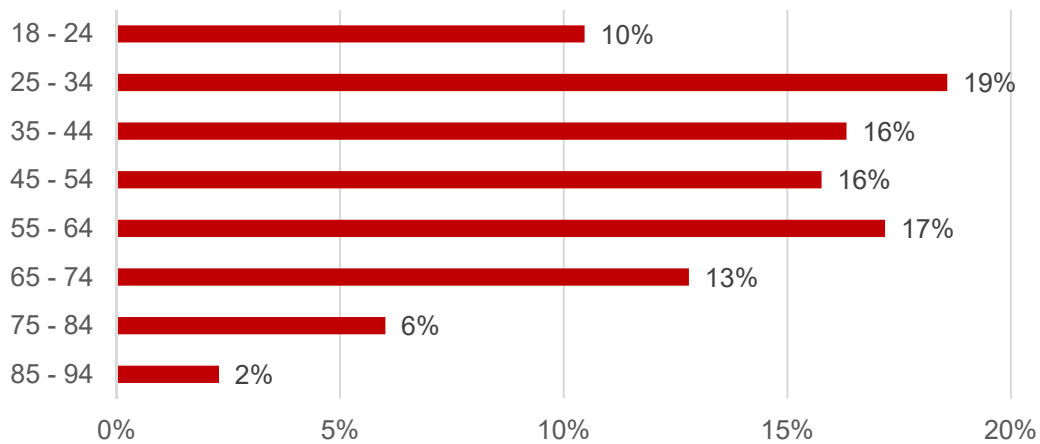


FIGURE 2 VOTERS BY AGE GROUP¹

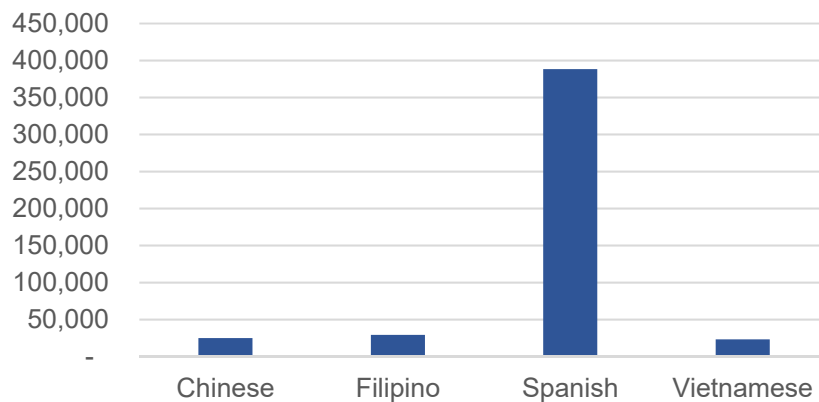


FIGURE 3 VOTERS BY LANGUAGE GROUP (FEDERAL)²

¹ A percentage of voters were excluded from these statistics due to unknown birthdate. These individuals registered before State law required a birthdate.

² The number of voters in these language groups are based on surname, birthplace and/or voters who request their voting material in the particular language.

Voter Turnout

The county has consistently demonstrated robust voter turnout during statewide general elections. The highest percentage voter turnout of registered voters tracked by the ROV was 84% in the November 2008 Presidential General Election. The highest votes cast was in the 2016 Presidential General Election with 1,346,513 ballots tabulated in the election. This can be seen in the last 18 years of voting in the county, as shown in Figure 4. Presidential elections normally attract a higher turnout than in gubernatorial elections.

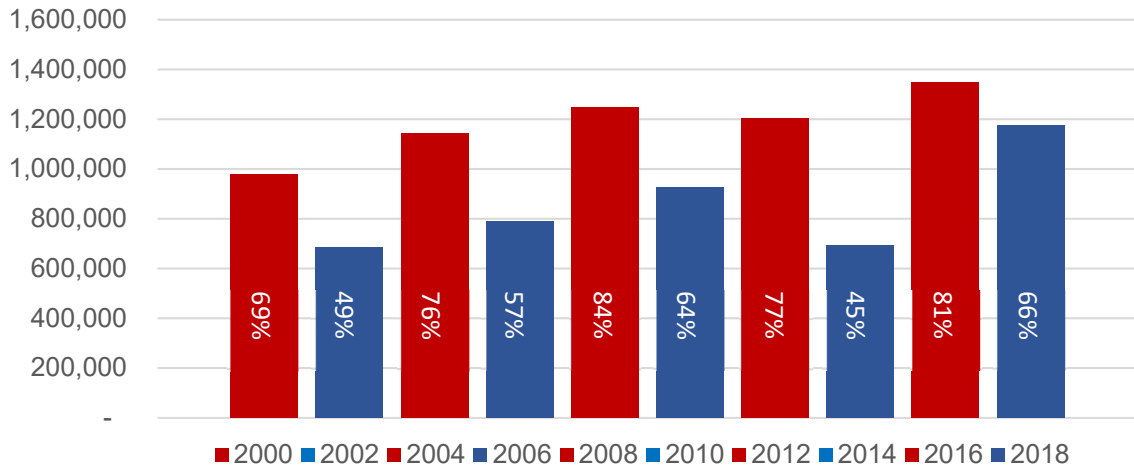


FIGURE 4 COUNTYWIDE VOTER TURNOUT (REGISTERED VOTERS)

Within the county, breaking out voter turnout between the cities and the unincorporated area, a higher percentage turnout, based on registered voters, generally occurs in the unincorporated area. In the November 2016 election the split was 83% to 81% and in the November 2018 election the split was 69% to 66%, respectively. As shown in Figure 5, as one views the distribution of the ballots counted across the last two general elections, the unincorporated area utilizes mail ballots more than cities. This difference is further explained in the following “Mail Balloting” section where the adoption rate of mail balloting is higher in the unincorporated area of the county.

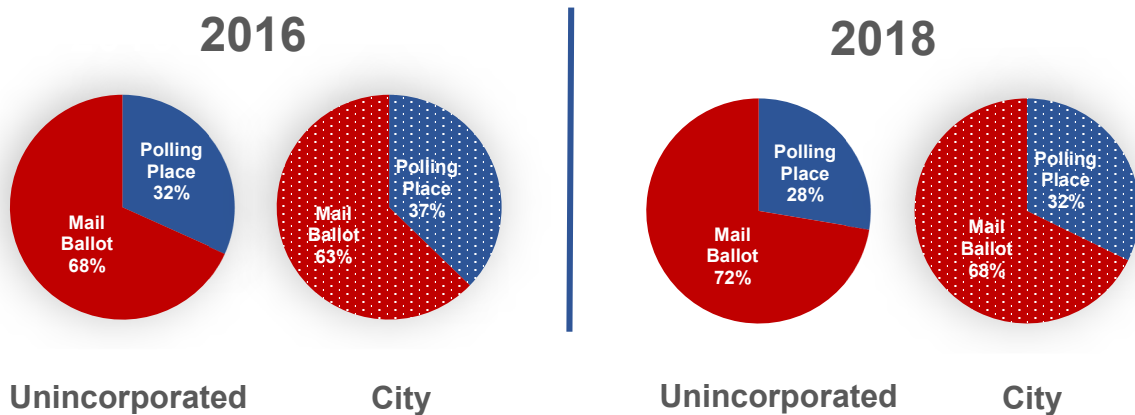


FIGURE 5 DISTRIBUTION OF BALLOT COMPARISON (UNINCORPORATED VS. CITY)

In comparison to the southern California region, San Diego County has historically been in the top tier when it comes to voter turnout of registered voters and is generally among the highest in the region.

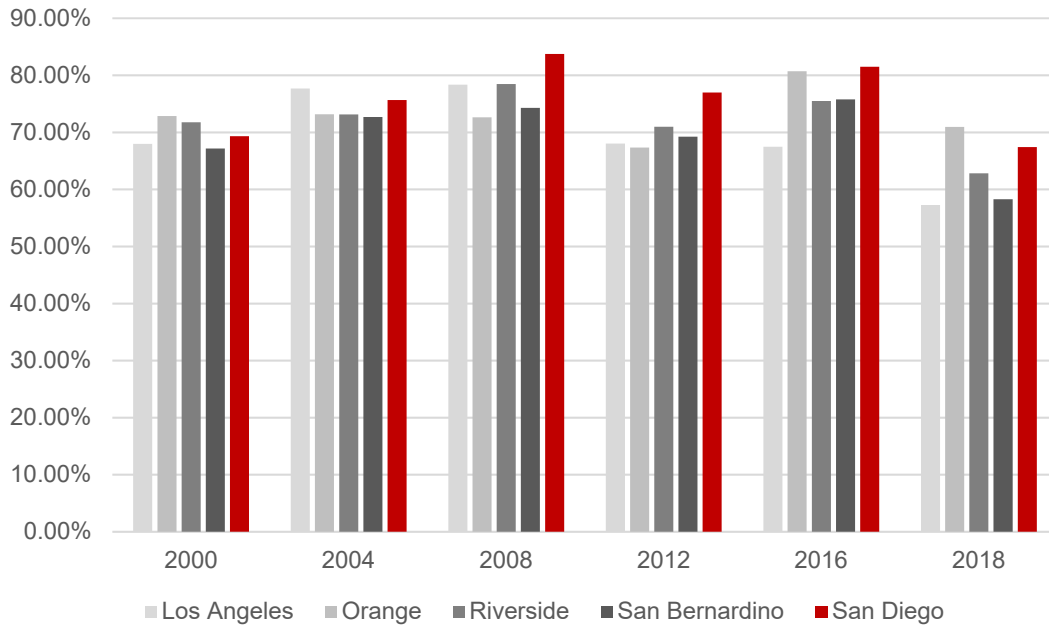


FIGURE 6 VOTER TURNOUT (REGISTERED VOTERS)

Mail Balloting

The growth of mail balloting in the state has been undeniable and it was one of the driving factors behind the passage of legislation creating the Vote Center Model. San Diego County has not been an exception to this growth. Over the past 18 years, the number of county voters requesting a mail ballot and casting their ballot by mail has increased fourfold (396%). In the November 2000 election, 327,459 voters were issued a ballot by mail; whereas in the November 2018 election, the growth increased to 1,297,557. Today, more than 7 in 10 voters receive a mail ballot, and nearly the same ratio of total ballots cast are mail ballots.

Mail ballot voters can be classified into three categories: permanent mail ballot voters, declared mail ballot voters or one-time requestors.

Permanent Mail Ballot Voters

Since the law was amended in 2001 to allow any voter to permanently receive a mail ballot, San Diego voters have increasingly turned to this option, where now 72% of registered voters are known as permanent mail ballot voters (PMV). While it was once considered that a specific type of voter was more inclined to vote by mail, today there is no typical voter. The increase in mail balloting cuts across all demographics including age, geographic location and ethnicity.

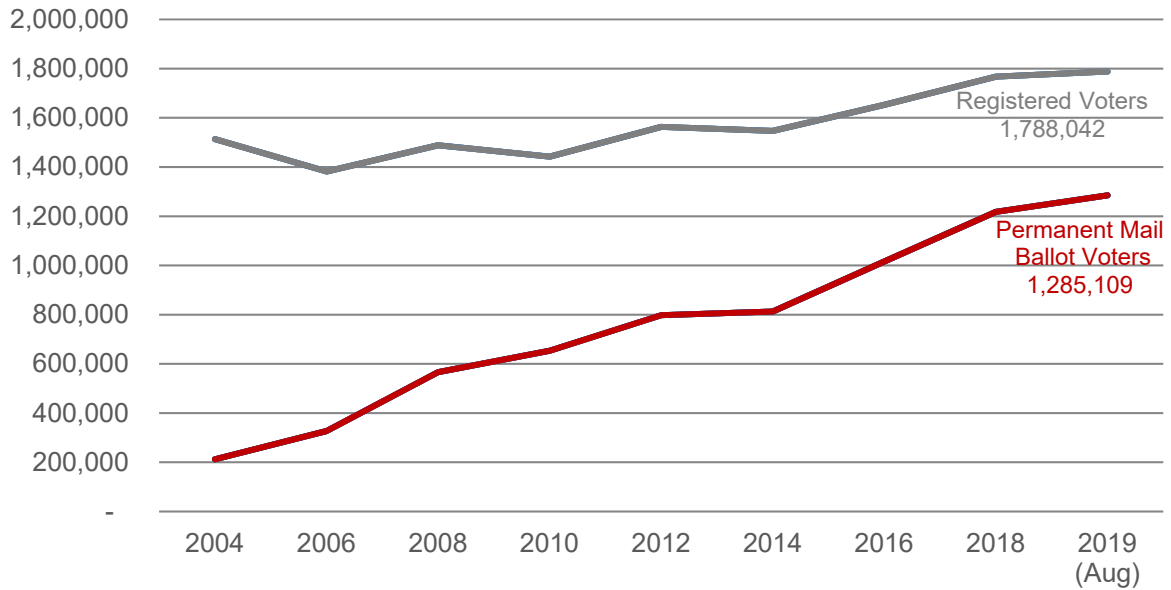


FIGURE 7 PERMANENT MAIL BALLOT GROWTH

When it comes to age group, the overall percentage of those signed up to be a PMV (Figure 8) similarly follows the trendline of the registered population by age (Figure 2). As shown in Figure 9, the overall adoption rate of those signing up to be a PMV within each age group is well above 50%, ranging between 69% (25-34 years old) and 85% (85-94 years old).

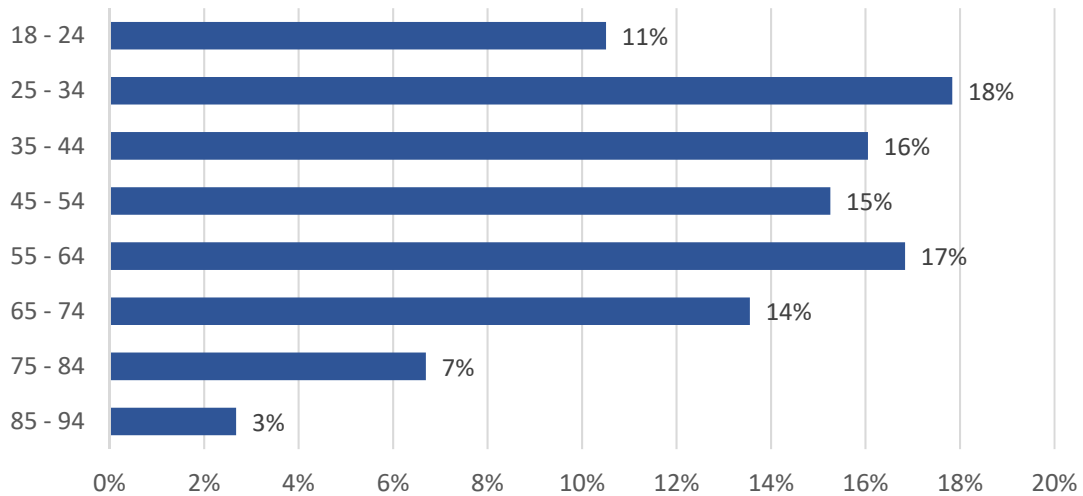


FIGURE 8 PMV BY AGE GROUP

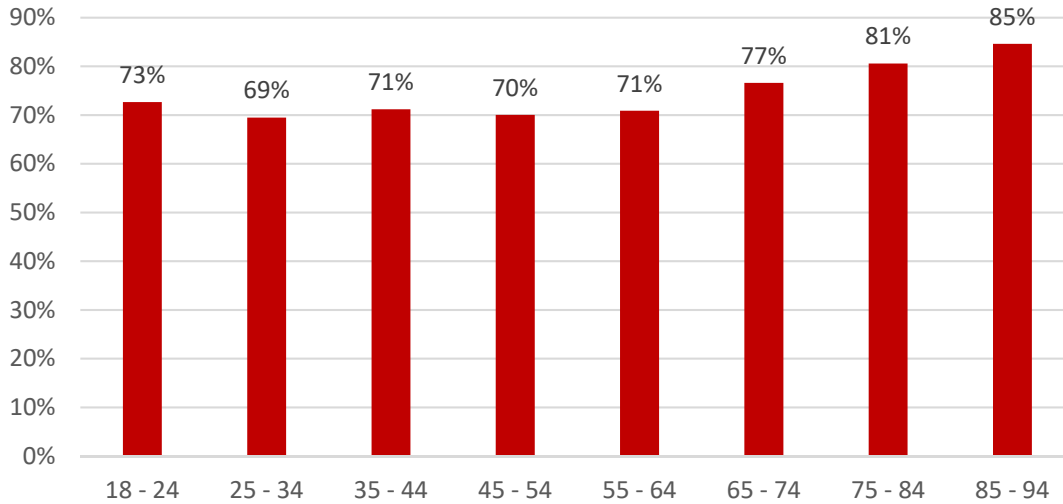


FIGURE 9 PMV WITHIN AGE GROUP

As shown in Figure 10, the PMV adoption rate between those who live within the unincorporated area of the county is higher by 2% than those who live within city boundaries.

As it relates to the make-up of PMV across ethnicity, it must be said that there are challenges in determining a voter’s ethnicity. As reinforced in the Secretary of State’s Voter’s Choice Act 2018 Primary Report conducted by the Center for Election Innovation & Research (CEIR), “Common methods of gathering ethnicity data often require a trade-off between completeness and validity.”³ In part, the difficulty in determining ethnicity arises out of an individual self-reporting their ethnicity when registering to vote. In fact, it is optional for a voter to self-report their ethnicity. As such, fewer than one out of five voters provide this information on their registration form.⁴

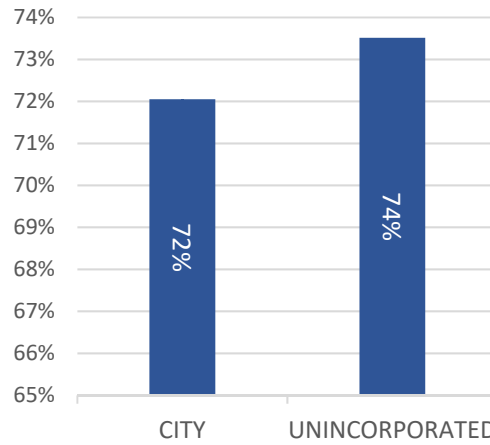


FIGURE 10 PMV CITY / UNINCORPORATED COMPARISON

³ Center for Election Innovation & Research (CEIR), *California Voter’s Choice Act – June 5, 2018 Primary Election Report*, 6.

⁴ CEIR, *California Voter’s Choice Act – June 5, 2018 Primary Election Report*, 6.

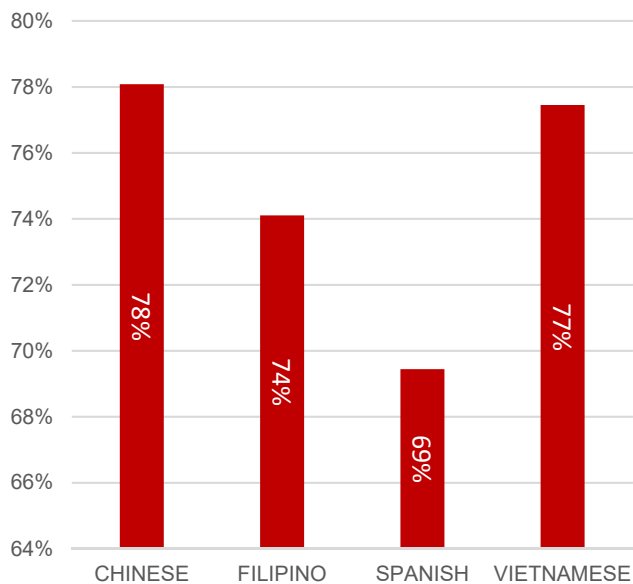


FIGURE 11 PMV COVERED LANGUAGES

In lieu of looking at ethnicity, the ROV has adopted its own method to project the voter population within the federally covered language communities the County is required to provide election services to under Section 203 of the Voting Rights Act (VRA). Using a combination of surname, birthplace and requestor (those who request their election material in one of the covered languages) data, the ROV since 2011 has been publishing projected numbers of Spanish, Filipino, Vietnamese and Chinese registered voters. The registered population figures are published monthly on the department’s website. Recognizing there will be a deviation factor, the chart in Figure 11 represents the projected mail ballot adoption rate of these language communities.⁵

Declared Mail Ballot Voters and One-Time Requests

Where permanent mail ballot voters are the largest group of mail ballot voters, declared mail ballot voters and one-time requestors represent smaller populations of mail ballot voters. In an election, when a consolidated voting precinct has 250 or less registered voters, California Elections Code provides authority to the election official to designate the voting precinct as voting by-mail. That is, all registered voters in the precinct would automatically be issued a mail ballot. Common reasons for designating a voting precinct by-mail include the precinct having a unique ballot type that bordering precincts do not share and/or there is a small registered population that is geographically isolated. Generally, the number of voters in declared mail ballot precincts in an election hover around 40,000.

Voters who generally vote at their assigned polling place do not have to be a PMV to receive a mail ballot. Polling place voters may apply each time there is an election that they are eligible to participate in. These “one-time” requestors for a mail ballot vary in quantity, based on their voting preference. In the 2016 and 2018 general elections, 51,787 and 36,591, respectively, exercised this option.

When declared mail ballot voters and one-time requestors were combined with the population of PMV’s, the overall percentage of mail ballot voters increased to 73% of the electorate in the 2018 Gubernatorial General Election.⁶

⁵ The Sycuan Band of the Kumeyaay Nation is also federally covered, however, the tribe has stated that they require no language services at this time. In addition, there is no method yet found to isolate this population across the county other than using the boundaries of the reservation.

⁶ In the November 2018 Gubernatorial General Election, 73.4% of registered voters were issued a mail ballot.

Mail Ballot Drop-Off (MBDO) Locations

Realizing the trend in voter behavior toward mail balloting, the Mail Ballot Drop-Off (MBDO) program was implemented to facilitate a timely return of mail ballots and provide an alternative to returning mail ballots via United States Postal Service (USPS) mail and in-person at the ROV. The ROV partners with the County Library Department and several city libraries to provide convenient locations for voters to drop off their voted mail ballot prior to election day.

The program began with 14 locations participating in November 2014 and expanded to 59 locations in November 2018. It now includes all County libraries and more than half of all city libraries within the County of San Diego - 33 and 26, respectively.

Since its inception, voters have increasingly turned to this program to return their voted mail ballot. The start of the program in November 2014, with the 14 locations, saw 16,368 voters drop off their mail ballot. In November 2018, with 59 locations, that number has grown to over 160,000.

The locations are recruited using the 14 minimum considerations for vote center and ballot drop-off locations from California Elections Code. An insert of the locations is provided to each voter in their mail ballot package. As well, the list is posted on the ROV's website during the MBDO period.

The program operates for eight days leading up to election day and program hours of operation coincide with the business hours of the location. No fee is paid to the public facility for use as a mail ballot drop-off location. There are two MBDO monitors at each location to receive mail ballots and to verify all information has been provided by the voter (e.g. signature).

In order to facilitate the program, a seasonal MBDO coordinator and a seasonal staff recruiter/office assistant begin preparing 90 days before the MBDO period begins. The staff recruitment period for MBDO monitors is two months with 14% dropping out after initial recruitment and submission of background paperwork.

To provide context, the number of seasonal election workers hired to implement the program in the November 2018 General Election was 179 monitors, 23 ballot security team drivers and 5 office staff. The 59 locations required 1,502 shifts, totaling 7,221 labor hours.

Training is required for MBDO seasonal election workers. The 2-hour course includes:

- Verification that the voter has signed the envelope before putting it in the secured mail ballot bag;
- Customer Service techniques;
- Diversity and Inclusion;
- Observer Policies and Procedures;
- Security and Chain of Custody procedures; and
- Accurate timekeeping (timesheet entries)

In addition to having the mail ballot bag attended by two monitors during business hours, other security protocols include:

- All staff members are required to pass a background check;
- Securable mail ballot bags are picked up daily by County drivers and exchanged with a replacement ballot bag;
- Each site provides a secure location to store the mail ballot bags and election materials;
- Mail ballot bags are sealed with serialized mini locks;

- County drivers secure mail ballot bags in vehicles during transport (same protocols as handling money transfer); and
- Seal verification on chain-of-custody documents is incorporated through forms completed by drop-off site monitors, County drivers and ROV staff.

Polling Places

In the Polling Place Model, California Elections Code regulates the number of voting precincts to be established in an election. An election official is limited on how permanent mail ballot voters factor in the total number of voting precincts to be established. Each precinct is not to exceed 1,000 registered voters on the 88th day before the election and, as mentioned, precincts with less than 250 registered voters may be designated as voting by mail. In San Diego County, the number of voting precincts for scheduled statewide elections, including presidential and gubernatorial elections has ranged from 1,403 to 1,697.⁷

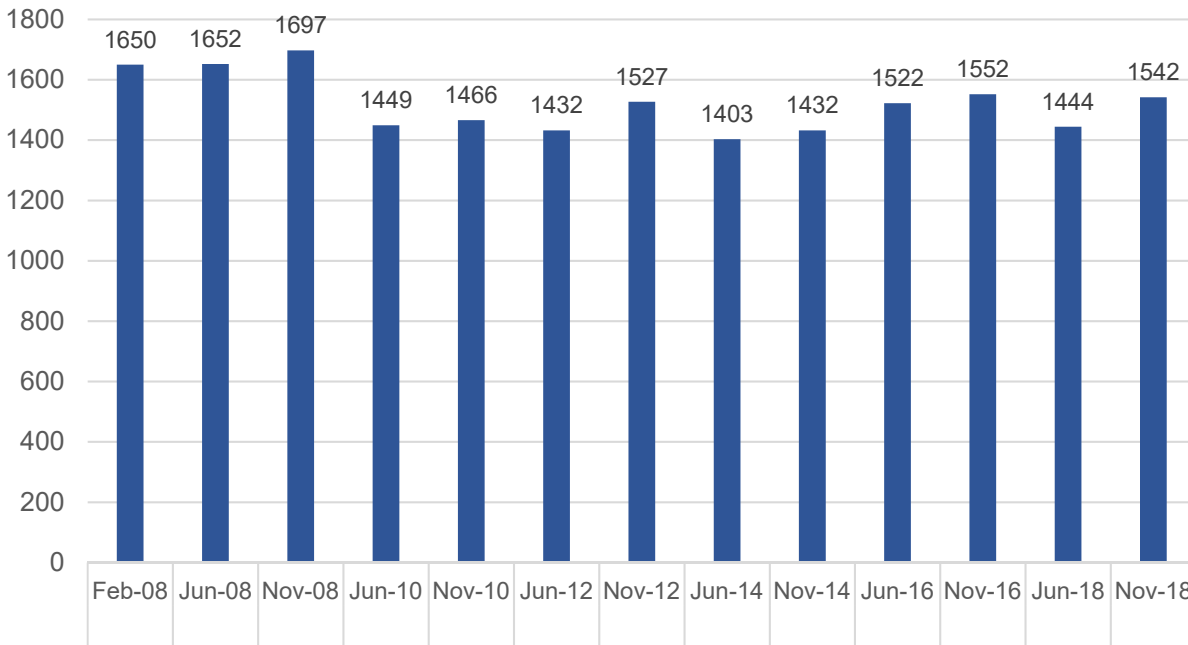


FIGURE 12 NUMBER OF VOTING PRECINCT CONSOLIDATIONS

To provide context, during the 2016 Presidential General Election, the ROV established 1,552 consolidated precincts at 1,376 polling places on election day for 1,652,875 registered voters. This was done despite 68% of registered voters being issued a mail ballot.

When selecting polling places, the department currently considers the following:

- Accessibility
- Parking
- Public transportation
- Square footage (300 sq. ft of usable space)
- Proximity to voters
- Type of facility (with preferences of public buildings)
- Availability (5:30 am to 10:00 pm on Election Day)
- Lighting
- Power (electrical outlets)

⁷ June 2014 and November 2008, respectively.

- Prohibition to use a location that is a candidate’s residence, matches the Megan’s Law website, or primary purpose is for the sale and dispensation of alcoholic beverages

Each potential site is surveyed prior to use. The ROV adheres to the Secretary of State’s Polling Place Accessibility Guidelines and the Voting Accessibility Advisory Committee’s recommendations. In the 2016 Presidential General Election cycle, the ROV conducted 244 physical polling place accessibility surveys with five teams of two, supported by four office staff members. In addition, to secure these facilities the ROV worked with County Counsel and the Department of Human Resources, Risk Management Division to issue 305 facility use forms and 286 Statement of Coverage forms.

The ROV currently offers a \$100 stipend to facilities each election. Of the 1,552 voting precincts established in 2016, 638 (or 41%) were free of charge which would leave the total cost to the County at \$91,400.

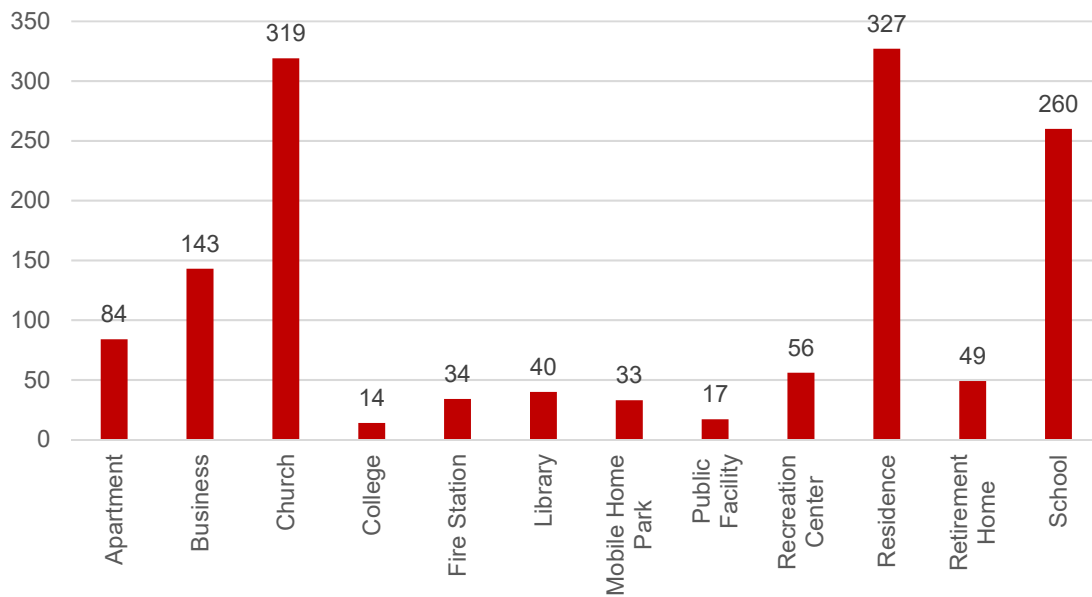


FIGURE 13 POLLING PLACE TYPES (NOVEMBER 2016)

Technology

There is a minimal level of technology in a Polling Place Model. In fact, the only technology that is issued at each polling place is one touchscreen unit to meet federal accessibility requirements. The ROV does not issue County-owned cell phones to ensure communication between the ROV and poll workers. Instead, the ROV requires the precinct inspector to have a cell phone and to use it to communicate with the ROV on election day. This not only helps limit the management of approximately 1,600 County issued phones, but also limits the risk of the ROV not being able to communicate with poll workers due to them not knowing how to navigate an unfamiliar device. In return for the use of their own phone, the ROV reimburses the poll worker by adding a small stipend.

Specific quantities of paper ballots, in all federally covered languages (i.e. Spanish, Filipino, Vietnamese and Chinese), are pre-printed and issued to poll workers along with the necessary supplies to carry on voting activity on election day. Included in the supplies is the paper Roster of Voters specific to the polling place. In the November 2018 election, ROV staff printed over 155,000 physical roster pages. This effort took 72-hours to print and utilized seven full-time employees, eight high speed printers, 17 toner cartridges, and 310 reams of paper.

Poll Workers

San Diego County poll workers have been the bedrock in conducting county elections. They have always faithfully served our community, ensuring integrity of each election and becoming ambassadors between the ROV and voters. Poll workers are generally registered voters; however, state law provides allowances for high school students and legal permanent residents to serve on election day.

En masse, nearly 8,000 poll workers are required to serve on Election Day across the approximate 1,600 consolidated voting precincts. The ROV has segmented the tasks of recruiting, assigning, training and reimbursing our volunteer poll workers into two primary sections: recruitment and training.

Recruitment

The ROV recruits and assigns precinct boards to each polling location. There are 45 temporary recruitment staff who correspond with registered voters and legal permanent residents who have expressed an interest in serving as a volunteer poll worker. During the 90-day period leading up to each major election, over 52,000 calls and numerous communications (i.e. USPS letters, emails, texts and faxes) are used to recruit and assign over 8,000 poll worker positions. There are four to six poll workers assigned to each precinct board depending on size and need. All poll workers are required to attend four hours of online and classroom training and are assigned to serve at a location of their choice, typically close to their home or desired area.

Each precinct board consists of one Precinct Inspector (PI), one Touchscreen Inspector (TI), one Assistant (AI), and up to three clerks (CL) who are considered volunteers and are paid a stipend to assist with costs such as transportation, meals, parking fees and training related expenses.

The PI is responsible to serve as the supervisor of the polling place and oversees all activities of the poll workers and must have previously served as a poll worker. The PI is also required to pick up polling place supplies 10 days prior to an election and must store them safely until election day. The PI receives a stipend of \$150.

The TI is the technical expert on the board and operates the electronic voting machine. The TI is also required to pick up polling place equipment 10 days prior to an election and must store all items safely until election day. The TI receives a stipend of \$125.

The AI is required to fill in for the PI in the event of the PI absence, accurately perform responsibilities of PI and/or TI while they are on break, assist provisional voters and ensure any ballot envelopes are completed accurately. The AI receives a stipend of \$125.

The CL ensures voter privacy as ballots are deposited in the ballot box from secrecy sleeve, checks returned mail ballot envelopes for proper signature and information, and hands out 'I Voted' stickers to voters. The CL receives a stipend of \$100.

Additional stipends are paid to poll workers for picking up and securing election day supplies (\$20), use of personal cell phone on election day (\$5), bilingual language assistance (\$15) and traveling to a poll more than 15 miles from home address (\$20).

There are five special recruitment programs led by a seasonal election worker program coordinator who is responsible for recruiting poll workers from specific groups of volunteers.

County Employee: Current employees of the County of San Diego are recruited to serve as election day workers. County employees may be eligible to utilize the Poll Worker Leave Program. In November 2016, 502 County employees served on election day with an additional 40 serving as Field Support Representatives.

High School Students, College Students, and State Employees:

Over the years, a large segment of poll workers has come from the ROV's High School Student and College Poll Worker Programs. In addition, other government sectors are encouraged to participate as poll workers including State employees. Each have a set of unique requirements and restrictions which may include minimum age, grade point average and guardian permission for students, and State employees must meet specific internal rules in order to receive pay under the Poll Worker Leave provision. Approximately 130 high schools, 15 colleges and various State departments participate.

2016 Presidential General	
RECRUITMENT PROGRAMS	POLL WORKERS
County Employees	502
High School Students	1,272
College Students	522
State Employees	55
Field Support Reps.	307

TABLE 1 RECRUITMENT PROGRAMS: NUMBER OF POLL WORKERS

Field Support Representatives (FSRs): A higher level and more skilled position that the ROV must fill is the Field Support Representative (FSR) position. FSRs are experienced PI's who have been promoted and have served at least three or more times in the PI capacity. FSRs oversee up to six poll sites on election day, assisting poll workers with correct procedures and serving as a resource. There are approximately 350 FSRs assigned to serve on election day, and the stipend pay is a fixed \$350. Additional stipends are paid to FSRs for the following: supply pick up (\$20), election night ballot return (\$50) and serving as a touchscreen expert (\$50).

Training

The ROV trains and equips all poll workers to accurately implement election day procedures and operate election day polling places. Poll worker trainings occur for a three-week period before election day, including evenings and weekends with a 75-person staff managing all activities. Both poll workers and FSRs are required to take online and onsite training - both types of class run concurrently during the three-week period.

Online Training

A 2-hour online training is updated prior to each election and is accessible to staff and poll workers approximately six weeks before each major election. All poll workers are required to complete online training in addition to attending classroom sessions. The training staff is required to pass the online training course with a score of 100% accuracy which helps to ensure poll workers are knowledgeable and comfortable with operating the polling place on election day.

Poll Worker Classroom Training

In-person classroom training materials used during the classroom training are updated prior to each election and serve to prepare poll workers to accurately implement their election day responsibilities. A PowerPoint slide presentation is developed along with a script that serves as the narrative for training teams to follow in class, along with corresponding updates to the election-specific poll worker manual.

Poll worker training classes are 2.5 hours long plus additional touchscreen training for specific poll workers.

College Site Training

Training teams are sent to two university sites on election eve, SDSU and UCSD, to train poll workers assigned at those colleges specializing in provisional voting.

Workshops

The weekend before an election, optional drop-in workshops are offered at six of the 11 training sites. Poll workers are encouraged to walk into a workshop to practice any of their election day responsibilities. Training teams are scheduled at each site to ensure there are enough ROV representatives to assist about 350 poll workers each day.

During the November 2018 Gubernatorial General Election over 8,000 poll workers were recruited and 284 training sessions were conducted at 11 regional sites, resulting in the training of 6,835 eligible poll workers available to work on election day.⁸

Field Support Representative (FSR) Training

FSR training is a four hour in-person class designed to educate FSRs, the highest level of election day field support, about their election day responsibilities. During training, FSRs are introduced to any legislative, procedural and operational changes specific to the election. FSRs are chosen from a pool of experienced poll workers to be the “eyes and ears of the ROV” and serve as support for poll workers, observers and media on election day.

⁸ The difference between poll workers recruited and those who served on election day is a result of poll worker attrition or ROV reassignment.

Approximately two months before an election, ROV training staff hire up to 75 seasonal election workers who develop the training to ensure poll workers understand election day procedures and feel confident assisting voters. Additionally, office staff prepare to provide a pre-election hotline where poll workers call for assistance in re-scheduling classes, understanding ROV correspondence, completing online training, or requesting resources and guidance. Additional staff perform clerical duties and are responsible for helping with the delivery of training supplies and equipment to the regional training locations.

Fourteen training teams of three (two trainers and a training assistant) are responsible for facilitating poll worker training classes and workshops. Each team is supervised and supported by a training lead who serves as the supervisor at each of the 11 regional training sites.

In order to have highly effective and uniform poll worker trainings, the ROV has an extensive Train-the-Trainer (T3) program which consists of a four-week intensive “boot camp”. The first week is known as “Lead Week” and is focused on the ROV’s long term seasonal poll worker trainers. Lead week is designed for specific, highly qualified, experienced election trainers to learn new training procedures, establish training teams that will demonstrate the ability to conduct a proper poll worker training class, and help develop training materials in advance of the remaining three-week T3 period.

T3 is the core of the poll worker training program and is held offsite (Marina Village) beginning approximately six weeks before each election with all seasonal trainers. The program provides a clear understanding of polling place procedures and equips trainers to accurately and consistently train poll workers. This period allows for the instruction and practice of all required components. Training teams learn the value of working as a team, poll worker processes, tools and supplies, how to use the voting touchscreens, and practice delivery of the poll worker training class materials. At the end of the three-week period, each designated team is required to demonstrate their mastery of election processes at polling places and their ability to train as a unit during dress rehearsals. Each team must pass this dress rehearsal before they are authorized to conduct live poll worker trainings.

Logistics

Operating under a Polling Place Model requires a coordinated effort to ensure poll workers and polling places have everything they need to operate on election day. As it relates to the logistics and warehousing of an election, the ROV is responsible for the inventory, purchase, assembly, testing, distribution, collection and tracking of election supplies and equipment throughout an election cycle. Storage, retention, logistics planning, vehicle rentals and dispatch, truck loading and unloading are additional projects required to fully ensure the ROV accurately supplies the polling locations with all necessary items for election day.

A staff comprised of four full-time employees will grow to a staff of more than 1,000 seasonal election workers (EW) and volunteers to carry out a polling place election, including 120 EWs to assist with issuing election day supplies, 200 EWs to accept ballots at the 60 Mail Ballot Drop-Off locations, 30 EWs to make up the Dispatch and Return Teams (DART), and approximately 600 stipend volunteers to conduct election night operations at 70 Collection Centers.

As an example, preparing for the November 2018 General Election entailed conducting two phases of testing on 1,542 touchscreen voting units; assembling over 3,000 sets of election day poll worker supplies and 275 sets of field support representative supplies; setting up 11 poll worker training sites; and managing approximately 150 vehicles (90 trucks, 35 vans, and 25 passenger vehicles) for poll worker training, supply pick-up centers, dispatch services and election night logistics. Included in the election

supplies are precinct-specific Roster of Voters, official ballots, sample ballot & voter information pamphlets, legally required stationery items and forms, security seals and general office supplies required to carry on voting at the polling place.

During the November 2018 Election, poll workers picked up their election day supplies at one of 26 supply pick up locations or at their training location. After the polls closed, poll workers dropped off these supplies, including voted ballots, at one of the 70 ballot collection centers.

Call Center

The ROV deploys a Call Center to address the large volume of calls it receives from voters. Throughout the 2018 General Election, the Call Center received a total of 57,976 calls. Call Center operations begin 50 days prior to elections and assist voters with a diverse mix of inquiries. Daily Call Center volume from the November 2018 General Election are shown in Figure 14.

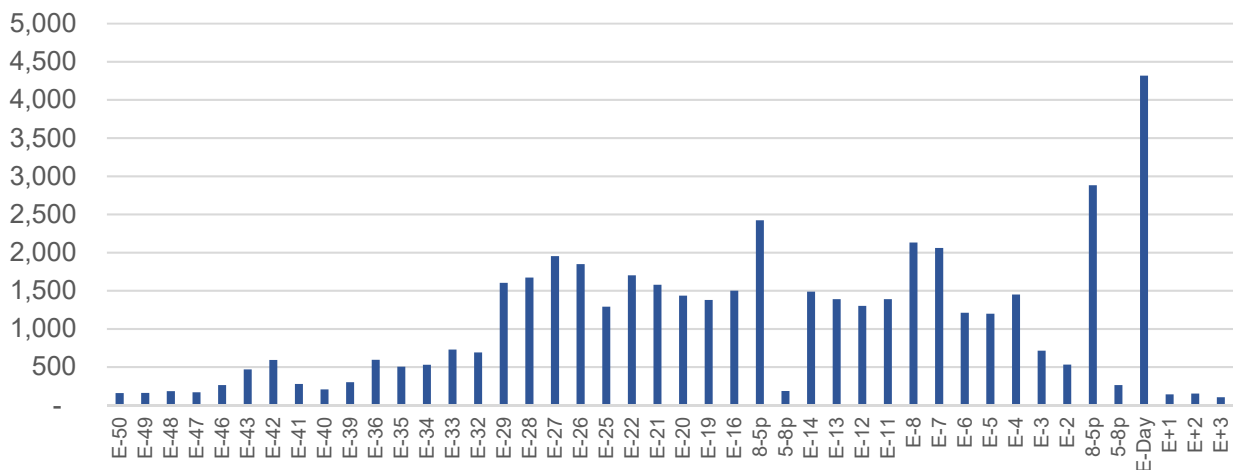


FIGURE 14 DAILY CALL VOLUME (NOVEMBER 2018)
E=ELECTION DAY

The largest number of calls received by the Call Center came from mail ballot voters. This group typically calls to inquire about the status of their mail ballot, corrections to their ballot, replacing their ballot, or mailing a second ballot if the original has not been received or if the voter changed their mailing address.

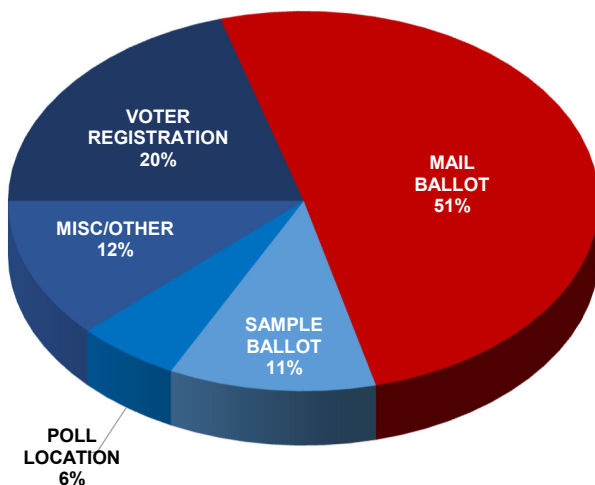


FIGURE 15 CALL CENTER VOLUME BY CATEGORY (NOVEMBER 2018)

Another major source of Call Center volume is driven by voters inquiring about their registration status. However, for this category of calls, the ROV does not believe there will be a substantial change in volume as the Call Center still expects to field a similar number of registration status questions under the Vote Center Model. The one caveat to this assumption might be the potential for a small spike in Conditional Voter Registration (CVR) related inquiries close to election day.

A third category of traditionally high Call Center volume has come from voters calling in because their name was not found on the roster of the polling location they attempted to vote at. A summary of Call Center volume by category from the 2018 general election is in Figure 15.

Language and Accessibility Programs

In the Polling Place Model, the ROV's language program provides a range of services to meet state and federal requirements, including community outreach and education, translation and proofing of election material and recruitment of bilingual poll workers.

In each election, a specific formula is used to determine the number of bilingual poll workers needed for each polling place to meet federal and state obligations. In the 2016 Presidential General Election, a total of 1,849 bilingual poll workers served at 1,512 (of 1,552) voting precincts to meet the requirements.

The department provides translated voting material in Spanish, Filipino, Vietnamese and Chinese, and ROV staff proofs all translated documents coming from the department's certified translation vendor. This ensures accuracy and uniformity of content across multiple documents and balances the need for universal understanding despite multiple dialects within a given language.

To ensure close community involvement, the ROV has a long-established Language Accessibility Advisory Committee with representatives from language minority communities who assist with identifying areas of language minority voters.

The department's outreach efforts include hosting two to five bilingual voter education workshops for each federal language and making multiple public service announcements via newspapers, radio, and television to promote upcoming elections in Spanish, Filipino, and Vietnamese. Public service announcements are also made in newspapers and radio for Chinese. In addition, the ROV attends community events to educate voters on election processes and voter information. In 2018, the department participated in 275 community events throughout the county, including targeted language communities.

As previously described, the ROV is required to survey locations and provide accessible polling places. In addition, an accessible voting unit must be provided at each polling place for voters with disabilities to cast their ballot privately and independently. To support these efforts, the ROV has a long-established Voting Accessibility Advisory Committee that is comprised of voters with disabilities and representatives of disability organizations. The advisory committee meets quarterly.

Election Day

Poll Worker Hotline and Dispatch

On election day, an ad hoc poll worker hotline and dispatch group is stood up consisting of 50 ROV staff members. The hotline operates from 5:30 am until the last poll worker leaves the polling place at approximately 10 pm.

Leveraging their gained expertise on election day procedures and operations, 40 poll worker trainers serve as election day hotline operators. They respond to poll worker calls and questions across the approximate 1,600 voting precincts, log calls and elevate concerns and dispatches to appropriate levels of staff and management. Eight dispatchers are responsible for dispatching FSRs out to the field based on poll worker needs or elevated conditions that require their attention and support.

The observer/media dedicated line is staffed with three office staff answering questions received directly from observers or members of the media who are visiting the polls and asking questions or raising concerns.

Dispatch and Return Teams (DART)

To ensure that all polling sites are serviced in an expedient manner during and after the polls close, the Dispatch and Return Team was established. The most significant dispatch that a DART team can provide is that of auxiliary ballots, but DART is also responsible for dispatching additional supplies that may be needed at any of the approximately 1,600 polling places throughout the County.

The DART Program utilizes ten sites throughout the county staffed with three team members at each site consisting of one truck driver and two dispatchers.

Ballot Collection Programs

Ballot Collection and Return programs are designed to allow for the secure return of voted ballots to the ROV as soon as possible after closing of the polls at 8pm. Currently, the ROV uses three separate programs to accomplish this task.

Polls Early Pickup (PEP)

The PEP program dispatches 29 reserve FSRs who will each be assigned to six polling places to directly pick up their voted ballots rather than wait for them to be taken to a CC. All PEP sites are strategically assigned to allow for the FSR to pick up voted ballots within 45 minutes after the polls close. The ROV uses Explorer Scouts (25) to facilitate the PEP and EBR projects. The retrieval of voted ballots at these specific polling places is considered the first wave of voted ballots to arrive at the ROV's office for processing and tabulation.

Early Ballot Return (EBR)

Field Support Representatives (FSR) are assigned to a specific Collection Center (CC) site to retrieve the voted ballots that have been dropped off by poll workers after the 8 pm close of polls. The FSRs returns these voted ballots to the ROV in order to continue reporting out polling place vote results. EBR ballots typically arrive at the ROV within 1 ½ hours of closing of the polls. The program is staffed using 55 FSRs who are paid a stipend for their election day service. The return of these voted ballots to the ROV's office is considered the second wave for processing and tabulation.

Collection Centers (CC)

90 trucks were used in the CC program in the November 2018 General Election, and approximately 600 staff are assigned to CC truck sites in order to collect all election supplies that were used at the 1,550 poll sites used in the election.

- 600 seasonal election workers are assigned to the CC sites and are paid a stipend. The stipend amount is from \$100 to \$200 and is dependent on their job assignment.
- A CC site may have one or two trucks depending on how many polls are assigned to return supplies and ballots.

Our Changing Environment

As the County weighs the option to implement the Vote Center Model, it is important to step back from the Model itself and scan additional election policies recently passed, policies currently being legislated and policies that are postured for consideration in the near future. These policies must be considered, in concert, with the deliberation of transitioning to the Vote Center Model.

Conditional Voter Registration

In 2012, Governor Brown signed into law Conditional Voter Registration (CVR), which provides individuals the opportunity to participate in an election if they missed the 15-day deadline to register to vote for an election. The law went into effect on January 1, 2017 with the 2018 election cycle being the first set of statewide elections where it was tested with real significance. The law provides that the election official shall offer CVR at all permanent offices in the county. In 2018, the ROV office was the only designated location. In the November 2018 Election, 2,353 individuals exercised this option during the 14-day window with 66% (1,555) of all CVR's occurring on election day.

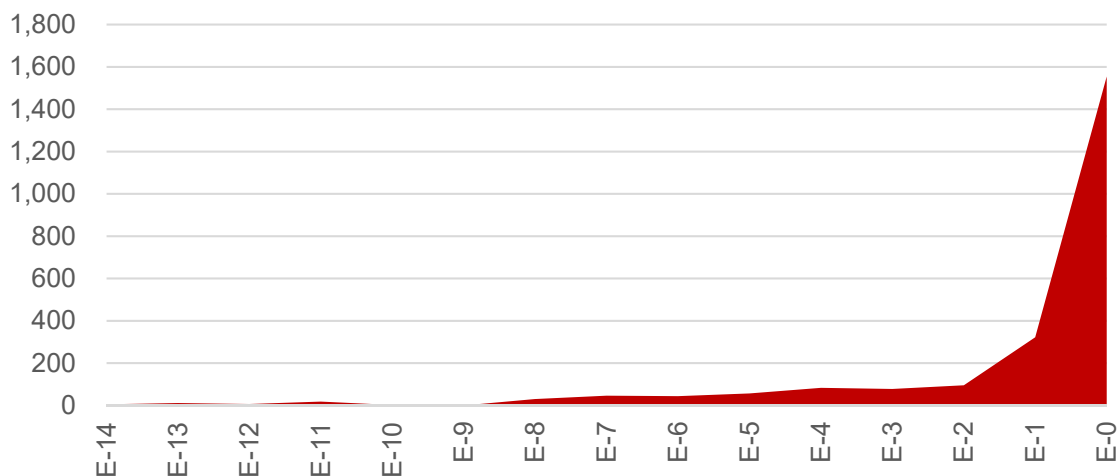


FIGURE 16 CONDITIONAL VOTER REGISTRATION VOLUME (NOVEMBER 2018)

As anticipated, the amount of time for ROV staff to register an individual and have them vote, effectively doubled. This created long lines on election day with waiting periods as long as three hours.

In this year's legislative session, Senate Bill 72 (Umberg) would allow CVR to occur at every polling place on election day. Although a voter-centric policy, the expansion of CVR to every polling place on election day puts additional pressure on the ROV's ability to manage the election for two reasons. First, the anticipated population of voters is less predictable. Although there are nearly 1.8M registered voters, the number who are not and who decide to exercise this option on election day may overwhelm a polling place creating long lines and a shortage of supplies, including ballots. As previously mentioned, CVR was only offered at the ROV office and so staff was able to adequately manage this isolated issue. Second, should a number of polling places be overwhelmed by would-be CVR voters, it has a high possibility of overextending the ROV's capacity to manage all of them at the same time. For example, 5% of 1,600 polling places would equate to 80 polling places that would require additional efforts to manage.

California Voting Rights Act (CVRA)

As a result of the California Voting Rights Act (CVRA), many local jurisdictions within the county are avoiding litigation by moving to a district-form of government. Although it has been widely known to occur in cities and school districts, the ROV is also seeing special districts (e.g. hospital/healthcare districts and fire protection districts) moving away from at-large elections. From 2016 to 2018, 18 political jurisdictions transitioned to a district-form of government. It is projected an additional 23 jurisdictions will be transitioning by the November 2020 Presidential General Election. If all are approved a total of 180 political districts will have been added before the November 2020 election.

This has a direct impact to the administration of elections as the county's inner boundaries are broken into smaller units – creating more voting precincts and ballot types. As a result, the administration of elections is becoming more complex to manage.

Remote Accessible Vote-By-Mail Mandate

In September 2018, Governor Brown signed into law Assembly Bill 1013 which requires all counties to implement a remote accessible vote by mail solution (RAVBM). Although a separate issue from consideration of the Vote Center Model, this example of a new state mandate must be factored in the budgeting of elections and noted when attempting to compare projected election cost in the Vote Center Model (or any other model) from historical actual election costs.

Pre-Paid Postage Mandate

Starting January 1, 2018, all return of mail ballots will be postage paid. Similar to the introduction and requirement of a RAVBM system, this mandate, regardless, of voting model must be factored out when drawing a comparison to prior election costs. Also, as will be explained in the “Recommendations” section of the Study, pre-paid postage should be considered when looking to amend the number of mail ballot drop boxes required under the Vote Center Model.

Assembly Bill 363 (Two-Year Bill)

Assembly Bill 363 would have effectively forced counties to move to a form of the Vote Center Model. In its current form, the bill requires one satellite location to be established for every 10,000 registered voters and the locations would have to be available for the three days leading up to election day. Should this bill be revisited in a future legislative cycle and be signed into law, traditional Polling Place Model counties would effectively be required to run dual operations. This raises the administrative risk of managing and conducting the election successfully.

New Voting System

A key feature of the County's new certified voting system is the ability for the Ballot Marking Devices to hold the thousands of ballot variations the ROV must produce in each statewide election. Equipped with this capability and other developed user-friendly election technologies, the ROV is now able to entertain extending services outside the ROV offices. Although the County's prior touchscreen voting units had similar capacity and features, the Secretary of State's decertification of the units in late-2007 left the ROV to scale back any thoughts or attempts to establish remote voting sites for early voting.

In addition, the new voting system provides back end operational efficiencies that have yet to be realized. This is not fully factored into the cost analysis, particularly when comparing against historical actual costs.

Feasibility: Vote Center Model

Operational Study

All Mail Ballot Election

Not apparent by title, the main tenet of the Vote Center Model is 100% of registered voters receive a mail ballot. The emphasis on mail balloting serves to recognize that voter behavior has changed throughout the state. The county has not been immune to this increase where 72% of registered voters have already signed up to be a permanent mail ballot voter, leaving approximately 500,000 registered voters whose only option, in a Polling Place Model, is to cast their ballot early at the ROV Office or at their assigned polling place on election day.

Should the County move to a Vote Center Model, the remaining 28% of the electorate would automatically receive a mail ballot for each election. The ROV is already postured to handle the additional outgoing and incoming volume. The ROV contracts with a vendor which can meet the additional demand to generate mail ballot packages; the ROV has a strong relationship with local USPS officials to receive return voted mail ballots. Finally, the ROV has invested in the backend infrastructure to handle the verification and scanning of returned mail ballots. This includes the investment in two high-speed sorting devices in 2018 and this year's procurement of a modern, more efficient certified voting system.

All voters would be mailed a ballot 29 days before the election with an envelope to return the ballot. Voters can choose to mail in their ballot, drop it off at a secure ballot drop-off location or box, or return the ballot to one of the many vote centers planned to be established as part of the new Model.

Consequently, the ROV anticipates the adoption would lead to a sharp increase in the volume of voted mail ballots requiring processing by seasonal election worker personnel. Unlike ballots that are cast at traditional polling places where voters place their ballots directly into the ballot box, mail ballots involve additional back office processing steps because each ballot is enclosed within an envelope requiring scanning, signature checking, milling, and (ballot) extraction.

Although automation has recently streamlined some of these back-office processes, additional time and effort will be required to process the additional mail ballots. As a result, the ROV expects back office labor costs to increase by as much as 50% over November 2018 election levels.

The ROV anticipates these changes will modestly shift voter activity to occur sooner in the election cycle. In addition, since similar services previously only available at the ROV office will now be offered by vote centers, the ROV forecasts a potential reduction in main office administrative labor.

Mail Ballot Drop-Off Locations

Under the Vote Center Model, mail ballot drop-off locations (MBDO) are required to be established throughout the county. Currently there are 60 MBDO's that are staffed by hired election officials. They are open to the public during the business hours of the location, starting seven days before the election.

In a Vote Center Model, a combination of staffed and unstaffed locations is expected to be available to the public. As currently required under the Model, starting 28 days before election day there must be at

least one drop-off location for every 15,000 voters that are registered as of 88 days before the election. Using today's registration figures, approximately 120 mail ballot drop-off locations would be required - double the amount the ROV currently has established. Drop-off locations must be secure, accessible to voters with disabilities, and at a minimum, located as near as possible to public transportation routes.

The California Secretary of State has prescribed regulations for MBDO locations, allowing for flexibility in determining whether the mail ballot drop box may be secured inside or outside, permanently affixed or temporary, and provides security requirements. For 28 days, the drop-off locations will be available for eight hours a day and on election day they must be available the same hours as the polling locations.

Establishing Vote Centers

As mentioned, the adoption of the Vote Center Model will require participating counties to establish vote centers at various locations throughout their jurisdictions. Vote centers will enable voters to: cast their ballot, drop off their mail ballot, obtain a replacement ballot, update their address, change their political party, receive language assistance, or use an accessible ballot marking device. Vote centers will also permit county residents to register to vote through election day. And, unlike the traditional neighborhood Polling Place Model, county residents will be able to vote at any vote center they choose up to 10 days before the election. However, as a trade-off, traditional voter-assigned polling places will no longer be opened on election day.

Transitioning from the Polling Place Model to the Vote Center Model will require the ROV to secure less facilities, but for a longer period. Under the Vote Center Model, the ROV must establish one vote center for every 50,000 registered voters for 10 days leading up to election day. The ROV must then establish a sufficient number of vote centers to meet a ratio of 1 for every 10,000 registered voters for three days leading up to election day. In today's figures, this equates to, at a minimum, 36 locations to operate for 10 days before election day and an additional 143 locations to operate for three days before election day. In total, the 179 vote centers would be open on election day from 7 am to 8 pm – the same voting hours as in the Polling Place Model on election day.

The site selection considerations for the Vote Center Model will require analyzing data from outside sources for the department's staff to evaluate and identify the optimal facilities. The amount of work and staff required to support surveying the vote centers for the first election would be similar to the Polling Place Model, but is not expected to be required for another four years unless there are modifications or the facility is unavailable. Since the ROV will be selecting fewer locations from the same pool of facilities, the amount of accessible voting locations has the potential to increase to 100%. As a result, it would also create a reduction in the number of sites requiring mitigation supplies and coordinated deliveries that occurs in a Polling Place Model.

To secure the facilities, the ROV will require a transition from facility use forms to contracts, which will reduce the quantity, but it will require the ROV to seek the assistance of other County departments. The overall rental cost is anticipated to rise; however, if donations increase then the overall rental costs for facilities may be reduced.

For siting vote centers using the State's 14 considerations, the department will use data from the election management system and the United States Census Bureau's American Community Survey:

- (1) Proximity to public transit
- (2) Proximity to communities with historically low vote by mail usage
- (3) Proximity to population centers
- (4) Proximity to language minority communities

- (5) Proximity to voters with disabilities
- (6) Proximity to communities with low rates of vehicle ownership
- (7) Proximity to low-income communities
- (8) Proximity to communities of eligible voters that are not registered
- (9) Proximity to geographically isolated populations (i.e. Native Reservations)
- (10) Access to free parking
- (11) Time and distance a voter must travel to reach a location
- (12) The need for alternate voting method for voters with disabilities
- (13) Traffic patterns
- (14) The need for mobile vote centers

All sites selected will be accessible to voters with specific needs and the considerations above will be assigned a score with the aggregate of each location being used for identifying the preliminary selection of vote centers. After the locations have been determined, at least 179 site surveys would be performed by five teams of two, supported by four office staff members. The ROV would complete contracts with the assistance of the Department of General Services and the Department of Purchasing and Contracting, and may also require Board of Supervisors approval.

Additionally, there is an extensive public input process required when siting vote centers. This process allows the ROV to better understand local area community needs and place the centers in the appropriate areas. Due to the diversity in geography, size and communities of the county, additional vote centers may be necessary to ensure proper coverage throughout the county.

For example, San Diego County’s unique mix of urban and rural (city and unincorporated) areas would be addressed in the siting of vote centers. In fact, the Vote Center Model contemplates this aspect with the inclusion of geographically isolated locations. Areas such as Descanso, Julian, Bonsall, Borrego Springs, Palomar Mountain, Boulevard, Lake Morena, Jamul and Pauma Valley could find a vote center located in its area despite the location having a registered population that is less than 10,000. In areas such as Fallbrook, Valley Center and Ramona, more than one vote center would be contemplated as a result of the area’s registered population size being over 10,000. If the ROV were to designate a vote center at each of the areas identified in Figure 17, the average ratio of vote centers to voters in the rural areas of the county would be 1:2,628, whereas the urban areas would be 1:10,379.

In lieu of a vote center, the ROV could move to exercise an option to adopt mobile vote centers to provide coverage. This would require additional investment but does provide another means to provide services to less populated communities.

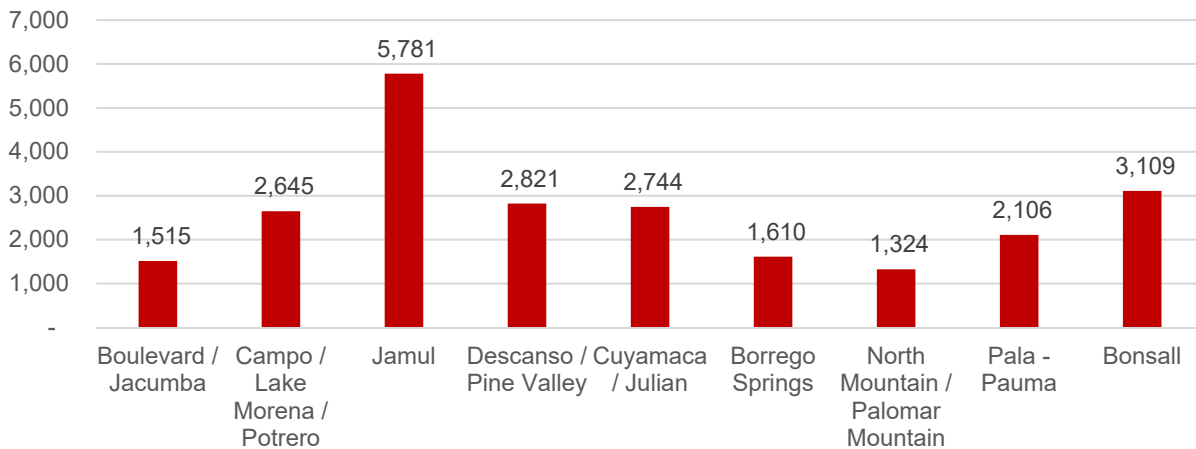


FIGURE 17 UNINCORPORATED AREAS VOTER POPULATION (SELECT)

Vote Center Layout – Ballot Marking Devices

The ROV has purchased, and will be introducing in the 2020 election cycle, Ballot Marking Devices (BMD) to replace its decertified and aging touchscreens. Unlike the previous touchscreens which produced a voter verifiable paper audit trail, the BMD is a touchscreen which generates a paper ballot of the selections made by the voter. Once printed, the voter is able to verify his/her selections before it is deposited into a ballot box. The deposited paper ballot will be scanned and counted by the County’s new tabulation system. Like its touchscreen predecessor, the BMD meets federal and state requirements for accessibility and is equipped to support multiple languages, including all five languages (i.e. English, Chinese, Vietnamese, Filipino, and Spanish) in which the County is federally required to provide assistance.

For the 2020 election cycle, one BMD will be used at each voting precinct on election day to meet the County’s federal accessibility obligations. In addition, the BMD’s will be the primary method of voting at the ROV during the in-office voting period.⁹

In a Vote Center Model, it is envisioned that a full deployment of these BMD’s will be used at each vote center. Voters who choose to not vote their mail ballot and decide to cast it at a vote center would be making their selections on these BMD’s. The advantage of using the BMD’s is it not only meets the accessibility requirements under state and federal law, but it has the capacity to contain the thousands of ballot variations in a statewide election, in the multiple languages the County is currently federally required to provide. This eliminates the logistical constraints of managing paper versions of each ballot. The chart below depicts the number of ballot types in past elections and the complexity of managing the thousands of variations created when considering languages and political parties.

Election	Ballot Variations	Ballot Type x Languages x Political Party/No Party Preference		
2016 Gubernatorial Primary	8,160	204	5	8
2016 Gubernatorial General	3,115	623	5	N/A
2018 Presidential Primary	1,305	261	5	N/A
2018 Presidential General	2,970	594	5	N/A

TABLE 2 BALLOT VARIATIONS IN SAN DIEGO COUNTY

The ROV would need to purchase additional BMD’s, using allocated federal and State funds, to fully outfit the number of required vote centers.

The ROV currently has 3,000 BMDs. However, moving to a Vote Center Model, ROV anticipates procuring as many as 500 additional BMDs for the 179 vote centers. For any given election, all BMDs used would be preloaded with all ballot types across all required languages. This allows a voter to walk into any of the vote centers and vote his/her appropriate ballot type. With the existing Polling Place Model, a voter could only go to their designated polling place to vote their specific ballot type. If a voter decided to vote elsewhere besides their designated polling place, he/she would have to vote provisionally, which may cause voter confusion and frustration. The new Vote Center Model streamlines the voter experience and allows flexibility and options to attend a vote center closer to work, school, or preferred location.

⁹ In-Office Voting Period coincides with the beginning of mail balloting – 29 days before each election.

The establishment of vote centers is to provide an array of voter services that would not normally be provided in a polling place environment. This includes the voter option to cast a regular ballot at a physical location, in lieu of their mail ballot.

Technological Enhancement

In order to establish a vote center, technology must become the backbone. Vote centers must “speak” to one another and to the ROV’s Office through the use of electronic roster of voters, known as electronic poll books (e-poll book). An e-poll book is a device which contains every registered voter within the county and allows ROV staff to verify a voter’s registration status, including the disposition of their mail ballot. By confirming a voter’s registration, vote center staff can provide the voter the correct ballot type to vote. By containing the real-time status of the voter’s mail ballot, vote center staff will be able to determine whether the voter can vote a regular ballot or vote provisionally.

Each vote center would have 10 e-poll books for a total of over 1,790 e-poll books. Each e-poll book will be connected at a vote center via a secure network routing device running Wi-Fi and dual SIM cards.

The e-poll book can electronically contain all voter records, which would eliminate the paper Roster of Voters effort mentioned above. This will cut down on staff time to print the rosters, save trees, reduce waste of toner/plastic into the environment – but most importantly, process voters more efficiently.

In the Polling Place Model, precinct-specific Rosters of Voters (Roster) have to be printed and correctly placed in the precinct supply box before being distributed to correctly assigned poll workers. Besides the issues that paper Roster presents including, but not limited to being torn or damaged, voter’s signing on the incorrect voter line, illegible handwriting of updated address, there is an extensive process after the election to capture the information of those who voted and those who did not. After election day, each Roster is scanned into a Roster Scan system where multiple data fields are verified, and exception errors are identified. Currently, ROV has 23 full-time staff working five days to complete the roster scan project and an additional week with one full-time staff to properly rescan missing roster pages to complete the project. Besides giving voters credit for voting, ROV staff uses the information contained in the Roster to prevent the possibility of double voting. Although the ROV has introduced efficiencies in this process over the recent years, the introduction of an e-poll book would greatly speed this post-election process. In a Vote Center Model environment, it would also greatly reduce the instances of voters needing to cast a provisional ballot unnecessarily because they could not surrender their mail ballot, or they visited the incorrect polling place. With the requirement to allow an individual to register and vote beyond the traditional 15-day close of registration until 8 pm on election day, the e-poll books provide a solution to more expeditiously handle these situations at the time of registering and when the ballot is verified and processed at the ROV post-election.

In order for communication to occur between e-poll books and the ROV, an investment in secure connectivity must occur. There are currently several connectivity solutions on the market which VCA counties are selecting to buildout their infrastructure. These solutions have multiple redundancy including multiple connectivity paths (i.e. Wi-Fi and LTE technology) from major carriers including Verizon and AT&T – technology services the County currently utilize. The devices would be programmed to accept the strongest signal from either Verizon or AT&T depending area coverage of each provider. This allows for built-in redundancy should one provider SIM card fail; the other provider will take over connectivity. These devices would be procured and managed by the County of San Diego’s IT Outsourcer – Perspecta. Perspecta will be responsible for securely configuring all 179+ routers including replacing devices, if needed; responding to trouble calls, and timely service level agreements. This service agreement with Perspecta would be in place prior to the go-live of the Vote Center Model.

With the use of BMD's, e-poll books and ancillary electronic equipment, a survey of each facility will be needed to identify whether it has sufficient power to run all equipment. For backup, the ROV would look to lease power generators and deploy them should they be needed.

Security

Security of the election process has always been of great concern and one of the highest priorities for the ROV. Regardless of the voting model, there are core principles which the County has adhered to. First, the County's voting system is certified by the Secretary of State under latest voting system standards required by the State. It is not connected to the internet, and it is not tied to any other application other than those used to count and secure the votes. The County's voting system is paper-based. All votes cast are ultimately on paper and the voted paper ballot is what the ROV tabulates. Any concerns about accuracy of results and outcome can be resolved by viewing the voted paper ballots.

Many of the security practices found in our existing Polling Place Model are portable to a Vote Center Model. This includes ensuring the physical security of equipment, establishing tight chain-of-custody protocols and implementing well-recognized cybersecurity principles and ensuring excellent cyber hygiene.

Physical Security

A greater level of physical security would be necessary in a Vote Center Model as each site must be open over multiple days. To that end, the ROV would coordinate with law enforcement officials to establish the appropriate level of security needed while balancing it with an open environment for voters to freely exercise their right to vote. In addition, the following protocols would be in place:

- The ROV would work with each facility owner to secure the rooms being used and put in place security protocols as it relates to access. This includes identifying only those that would have access (badge and/or key) rights to the voting area. Because the BMD's do not tally votes, this provides an additional layer of security.
- Ballot tabulation scanners would not be located at any of the satellite locations. The count is conducted centrally, at the ROV office – scanners always remain under ROV control.
- Video cameras would only be used to the extent that it provides a layer of security and would not be used during voting hours.
- Ballots will be picked up from each vote center on a daily basis and more often should it be necessary. Chain-of-custody protocols and documents will be necessary between vote center staff and ballot pickup staff. ROV Pickup Teams will be trained and be coordinated with specific routes to maximize efficiency and security.
- Daily reconciliation of ballots issued and ballots received would be conducted. This includes reconciling the counter on each BMD unit.
- The ROV will have a locked ballot box and tamper evident seals will be used on the BMD to identify whether any voting equipment has been compromised.

The ROV has pre-election and post-election testing protocols to ensure the system is counting ballots/votes accurately. One of these protocols include the 1% manual tally of votes cast, which is conducted during the 30-day canvassing period after election day.

Cybersecurity

The vote centers will require a Wi-Fi router to route encrypted data from the e-poll books – ultimately updating the voter rosters for check-in management and ballot type. The router's security features allow

the devices to be locked down and only the e-poll books connect to the router for transmitting encrypted data – no public access is restricted. The e-poll book solution utilizes SSL or TLS encryption algorithms within its application. All e-poll book solutions have passed rigorous testing and been approved by the California Secretary of State for use.

When it comes to protecting our voter registration system, the County follows the [“National Institute of Science and Technology Cyber Security Framework”](#). This includes a best practice of implementing a multi-layered security system that includes various technologies, separations, monitoring, training, and operational process and procedures.

The ROV would look to the County’s outsourced IT vendor to continue providing cybersecurity monitoring and mitigation throughout the election cycle. Specific security posture in place include:

- Having multiple firewalls that allow data to pass only through specific network zones as designed.
- Implementing a solution to handle Distributed Denial of Service (DDoS) attacks, or cyber-attacks, in near real time. This solution can scale up and extend out so that critical services and servers are not slowed or taken down.
- Conducting health checks for monitoring and support of the website and local servers.
- Intrusion prevention systems and firewalls are setup throughout our system to identify malicious activity. The data is logged, block/stopped and reported. These systems send an alarm, drop malicious packets, reset the connection and/or block the traffic from an offending IP address.
- The ROV Team is trained on best cyber hygiene practices, including identifying and reporting suspicious emails.

Staffing Vote Centers

As in all large endeavors, the success and performance can be isolated to the individuals participating in it. This is no different as the ROV would be required to change its organizational structure to fit the Vote Center Model. Human resources staff would be seen to play a larger role in the coordination to onboard up to 2,500 seasonal election workers. Poll worker recruitment staff who would otherwise be focused on a Polling Place Model would shift roles to focus on recruiting qualified individuals who are able to serve over multiple days at vote centers. Vote center staff would have different roles including those who would manage the site, those who would assist the manager(s) to coordinate the activities of the site and those who have specific roles to either greet, lookup, issue a ballot, register, answer questions and troubleshoot issues and assist voters to deposit their voted ballot in the ballot box.

With the need to have individuals who can serve over multiple days and have specific skillsets, the ROV would transition volunteer poll workers to vote center election workers. The ROV would recruit existing poll workers as its main group to fill these “new” positions. In fact, the ROV sees poll workers as instrumental to the success of any conversion to a Vote Center Model.

In conducting interviews with six vote center counties to determine the variations in recruitment strategies, it was found that most of the counties pull from their current pool of poll workers and conduct interviews with them in order to make appropriate assignments. One county relies completely on the review of new applications without reliance on their current poll worker pool, and yet another county makes placements based solely on past performance of current poll workers without conducting interviews.

In an implementation of vote centers throughout the county, the number and duration of the current voting location staff (currently volunteers) would change as follows: 8,000 volunteers attend training, work one day and receive a stipend between \$100 and \$175 per day. Under a Vote Center Model, the number of

hired hourly seasonal election workers will be over 2,500 workers and be paid between \$14.25 and \$25.00, depending on the type of position assigned.

On its face, the Vote Center Model may appear to need less individuals by one-fourth the amount in a Polling Place Model. Additionally, one may conclude that administrative tasks such as recruitment, hiring and training would also be reduced by an equivalent amount. However, these would not be the case. Since the Vote Center Model requires being open up to 10 days before election day for at least 8 hours per day, the amount of hours vote center staff would work would be equivalent, if not more than, the Polling Place Model. Since stipends would be replaced with hourly wages, the County should expect an increase in costs to transition from poll workers to vote center staff.

In the six counties interviewed, the number of vote center staff averages six workers at each location, with two counties increasing that number to 10-15 workers on Election Day. Workers are required to work a full day - no shift work is allowed in any of the counties, and with the exception of one county that pays a stipend for each day, all other counties reported they pay an hourly wage to their vote center workers.

In order to handle the volume of correspondence and personnel documentation required to appropriately hire vote center workers, these counties on average hire one election worker to recruit staff for every five sites during the months prior to an election. Using this Model, the ROV would hire 45 recruiters to hire and assign vote center workers.

While an increase in cost would be seen, this view should be balanced with the view that an expansion of services and access is being made available to all voters within the county – giving them ample time to visit any vote center should they need. Currently, this level of service is normally reserved at one location in a Polling Place Model – the ROV office.

Recruitment

In the Vote Center Model, the ROV would hire hourly seasonal election workers rather than pay a stipend to election day volunteers. At this time, it is planned that all 45 seasonal election workers who currently recruit the 8,000+ election day volunteers will still be needed to assist with recruiting, evaluating, reviewing and processing vote center staff to be assigned to each vote center. In addition, these election workers would be required to maintain accurate work records on each of the vote center staff for scheduling hours and locations of work, proper documentation, payroll and follow up on issue and concerns. Alternative options on recruitment staffing and strategies will be considered should the County move to a Vote Center Model.

Despite having a fewer number of individuals to recruit to serve on one day, the ROV does see challenges in identifying and recruiting vote center staff over multiple days (4 to 10 days) who have a higher level of technological skills than currently required under the Polling Place Model. As a result, a four month lead time is anticipated in order to recruit, interview, hire and process applicants and verify backgrounds checks for approximately 2,500 vote center workers.¹⁰ The amount of recruitment time will be refined based on the initial roll out of the Vote Center Model.

Training

One model being used in vote center counties is to have one training location dedicated for training each of the five major functions, or stations, to be performed at a vote center. In addition to these, there is one site to specifically train to the higher-level requirements for training the site managers.

¹⁰ Additional recruitment efforts over 2,000 is required to address the 19% attrition rate, usually experienced in the Polling Place Model.

For the County's training purposes, this model would decrease the number of training sites from 11 sites (eight regional sites plus three remote sites) down to six training sites and would reduce the number of training teams required to provide training to the 2,500 vote center workers from 14 to eight.

Language & Accessibility Programs

Transitioning from a Polling Place Model to a Vote Center Model will have nominal impact on the ROV's language services program. Current operations and responsibilities cover many of the requirements for the Vote Center Model, and areas that are not covered can be picked up within the existing program or be substituted for activities that would have otherwise occurred under a Polling Place Model.

Language services staff would continue to support bilingual worker recruitment and translation and proofing services as needed. It is anticipated that a conversion to the Vote Center Model would reduce the number of federally required bilingual skilled workers in all languages except Chinese. However, an increase in resources is likely needed to meet the bilingual worker and translation requirements for state-covered languages (i.e. Korean and Arabic).

The ROV would continue to provide translated voting material in all federally required languages and would provide specified translations in the state covered languages. For example, translated information in state and federal languages will be added into sample ballot & voter information pamphlets and mail ballot packets informing voters that:

- (1) an all-mailed ballot election is being conducted and each eligible voter will be issued a mail ballot;
- (2) they may cast a mail ballot in person at the ROV; and
- (3) they may request a vote by mail ballot in a language other than English no later than seven days before the election.

The ROV hosts multiple bilingual voter education workshops for federal languages each election; however, in a Vote Center Model, the department would need to add state-covered languages in its workshop offerings. Similarly, the department would also continue to make public service announcements in federal languages using newspaper, radio, television and social media to promote upcoming elections and would expand these same announcements to state-covered languages.

The ROV would continue to attend community events, including targeted language communities, to provide education on election processes and general voter information. These events will also be used to specifically inform voters about the Vote Center Model.

In order to meet the language and accessibility criteria outlined in the Vote Center Model, the ROV sees its long established and strong collaborative working relationship with its Language Accessibility Advisory Committee (LAAC) and Voting Accessibility Advisory Committee (VAAC) as pivotal in any successful transition. The department would work with committee representatives to identify areas of language minority voters for the federal languages and may also use information from the Census Bureau's American Community Survey for state languages. As well, committee representatives would be engaged to ensure outreach efforts are made to inform voters with specific needs about the Vote Center Model and the accessible forms of voting, such as Ballot Marking Devices and Remote Accessible Vote By Mail.

Logistics

Call Center

The move to the Vote Center Model may impact the ROV's Call Center volume and the nature of the calls it receives. Initially, the ROV expects call volume to increase (when compared to previous elections) as callers may request information about the new Vote Center Model, why it was implemented, and how they might be affected by this change. However, the ROV's early voter outreach efforts may assist in educating the voting community to ensure they are aware of the new voting process. Such outreach efforts should help pre-empt the potential increase in call volume.

As mentioned, the largest number of calls received by the Call Center come from mail ballot voters. Given the additional 500,000 new mail ballot voters expected due to adoption of the Vote Center Model, the ROV anticipates a significant increase in mail ballot related call volume. As it relates to voters inquiring about their registration status, this category of calls is not believed to have a substantial change in volume as the Call Center still expects to field a similar number of registration status questions under the Vote Center Model. The one caveat to this assumption might be the potential for a small spike in CVR related inquiries close to election day.

Because the Vote Center Model replaces traditional polls with vote centers for in-person voting, the ROV expects far fewer calls on election day from voters related to their name not being found on the list of registered voters. However, the Vote Center Model introduces a new category of caller inquiry concerning the voter's nearest vote center location. This category is anticipated to become the second largest source of Call Center volume.

Since the adoption of the VCA may impact the ROV's Call Center operations as discussed previously, we plan the use of various technologies to mitigate any adverse impacts resulting from the migration to the new Vote Center Model. One example involves the use of Interactive Voice Response (IVR), which is an automated telephony system that interacts with callers, collects information, provides automated caller assistance, and routes calls to the appropriate recipients. Another technology option to explore involves the deployment of a mobile app that voters can use to find the nearest voter center, with the shortest line, given their current location. The ROV would also plan to explore the use of a virtual smart phone assistant, such as Alexa or Google Assistant, to carry out this same function without the need to download any type of app. Leveraging these types of tools and technologies should alleviate a large portion of impact associated with the migration to the Vote Center Model. The ROV would continue to provide the online voter portal where voters can access and check their registration status and the disposition of their mail ballot – outgoing and incoming.

Staffing

As mentioned, nearly 1,000 staff members are needed to provide logistical and warehousing services in a Polling Place Model. Should the ROV transition to a Vote Center Model, temporary staffing needs are anticipated to be reduced by 10-15% in labor costs. This is due in part to the migration from a precinct-specific and paper-based preparation model to a more 'generic' and technological preparation model.

Instead of issuing pre-printed polling place ballots, voters would mark their ballot on a Ballot Marking Device (BMD) that will print the voter's choices. Since all BMD's and supporting equipment will contain all ballot types and variations, they will be staged and prepared in "generic" assembly line fashion. This style of preparation mitigates the inherent risks associated with preparing and distributing 1,500 to 1,600 unique sets of polling place supplies.

Furthermore, there would no longer be a paper Roster of Voters printed for each polling place listing each voter's name assigned to vote there. Instead, vote centers will use an electronic poll book with near real-time registration information of all voters - allowing any San Diego County voter, or anyone qualified to register to vote, to visit the vote center and cast their ballot. By moving away from paper-based and precinct-specific preparation, the number of seasonal election workers involved in logistics and warehousing is anticipated to be reduced as follows:

- 120 supply EW's will be reduced to 40 to accomplish the new requirement of delivery, set up and tear down of at least 179 vote centers and staff 10 DART sites.
- 200 MBDO EW's will be reduced significantly down to 20 in the Vote Center Model where the current MBDO monitors will no longer be utilized. In the new model, library staff on-site at the 60 established library locations would accept the voted mail ballots and 60 additional outdoor, unstaffed permanent drop boxes will be made available. 20 ballot security drivers will be assigned to daily ballot pickup routes.
- 600 stipend volunteers will be reduced to 40 to assist in Early Ballot Return.

Similar tasks for a Polling Place Model election should be expected under a Vote Center Model election. As they do today, tasks will include the preventive maintenance (PM – “Phase 1”), the election specific preparation (“Phase 2”) and then the deployment and retrieval of the voting equipment. However, unlike the 1,500 to 1,600 polling places, there will be minimal stationery supplies that need to be assembled for the 179 vote centers. This preparation is anticipated to take eight weeks and be ready to begin loading for delivery and set up approximately 19 days before the election.

Staff will still be required to conduct periodic preventive maintenance (PM) for components of the voting system that will be used at the vote centers. Where there were 2,000 pieces of touchscreen equipment to PM, in the future there will be up to 8,000 pieces of equipment that will be prepared and used for the Vote Center Model.

As mentioned, in today's Polling Place Model, poll workers are required to pick up their election day supplies at one of 26 Supply Pick Up (SUPU) locations set up around the county. This event currently takes two days to issue 75% of the supplies; the remainder are issued to poll workers during the next eight days before the election. In the Vote Center Model, it is envisioned that logistics and warehouse teams would deliver and set up 179 vote centers in two stages. About 20% of the total vote centers will be open to the public 10 days before the election and then all locations will be open three days before and on election day. Voted ballots will be picked up daily by teams, using established chain-of-custody protocols and based on the regulations prescribed by the Secretary of State.

Election Day

On election day, vote centers will be open during regular voting hours just as polling places currently are. There will not be the traditional method of poll workers returning voted ballots, supplies and equipment to one of 70 Collection Centers after the polls close on election night. In its place, voted ballots are anticipated to be brought to a DART location (or the ROV) by no less than two ROV designated staff members from each vote center. As in each night the vote center is open, the equipment would be secured overnight after the polls close. Equipment from all vote centers is expected to be picked up by the fourth day after the election.

Ballot Collection

The Secretary of State's administrative regulations require a minimum of two ballot security officials to pick up voted ballots from staffed and unstaffed drop-off locations every four days between the 28th day

before the election and 10th day before an election. After the 10th day, ballots must be picked up at staffed drop-off locations every day and at the closing of polls on election day. If the volume of ballots being dropped off is larger than expected, additional pick-ups will be arranged. Ballots at the unstaffed locations must be picked up every 24 hours after the 10th day before the election and at the closing of polls on election day. Chain-of-custody procedures will be used in all instances.

To ensure utmost security with the handling of voted mail ballots, the ROV's current intention is to pick up mail ballots daily at each location, regardless of the drop-off location being staffed or unstaffed.

Dispatch and Return Teams (DART)

Dispatch and Return Teams (DART) would still be in use on election day in a Vote Center Model. A DART is a mobile supply truck with additional election day supplies such as auxiliary ballots, provisional envelopes, pens, "I Voted" stickers, voter pamphlets or other items that are available in the event a polling place requires additional supplies. DART trucks are also where the field support staff turn in their supplies and logs at the end of election day. A modified version of this program would be in place in a Vote Center Model election, with DARTs serving as a vote center ballot return site.

Election Central

Under a Vote Center Model, the ROV would continue to publish results shortly after the 8 pm close of voting and the results would consist of mail ballots and vote center ballots cast prior to election day. However, it is anticipated that a sharp decline in the number of regular ballots will be cast on election day at a center, and instead an increase, as currently being experienced, of voters would drop-off their voted mail ballot. Should this occur, subsequent election night result bulletins would reflect a minimal number of additional ballots.

With the first 8 pm results report representing the bulk of all results on election night, and a nominal number of ballots going into the count after the close of voting expected, the relevancy of Election Central may be in question.

Provisional Ballots & Processing

One of the major implications of the Vote Center Model may be seen through the number of provisional ballots cast during an election. Provisional voting is a method used to ensure properly registered voters can cast a ballot that will ultimately be counted. A provisional ballot can only be counted after county election officials have confirmed that the voter is registered to vote in the county they voted in and did not vote previously in that same election. Unfortunately, the flexibility offered by provisional voting does come at a cost as the amount of effort involved to verify a voter's eligibility and process their provisional ballot is substantially greater than when processing a mail or polling place ballot. Yet, these additional steps are necessary to protect the integrity of the election results.

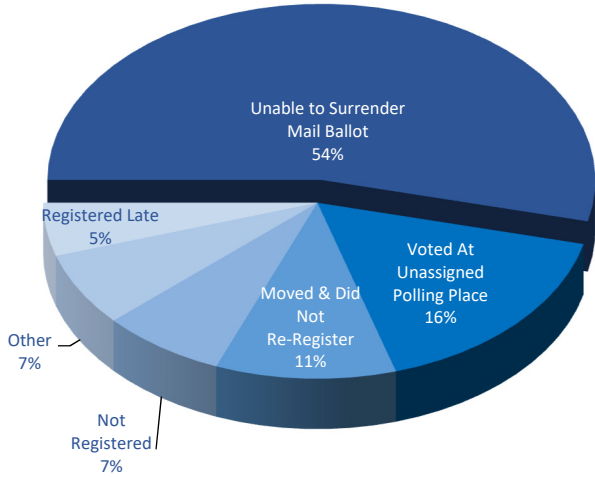


FIGURE 18 PROVISIONAL BALLOTS BY CATEGORY (NOVEMBER 2018)

Historically, the most common reason why provisional ballots have been used is when a mail ballot voter decides to vote in person at their polling place, but does not have their mail ballot to surrender. Another common situation occurs when a voter is not on the official polling place Roster of Voters because they recently moved within the county without re-registering. A third frequent case involves voters voting at a polling place different from their assigned location. This scenario is particularly troublesome and time consuming because in some instances, the ballot may need to be redacted/remade in order to ensure the person only voted in the contests for which they are eligible to vote. Most of this volume can be attributed to the common situations discussed above and can be seen in Figure 18.

There has been a sharp increase in the number of provisional ballots cast by county voters over the past two decades. For example, during the November 2002 election, only 12,308 provisional ballots were cast. Yet, by November 2018, this figure had grown to 99,591.¹¹ The following chart highlights the steady rise in provisional voting by county constituents:

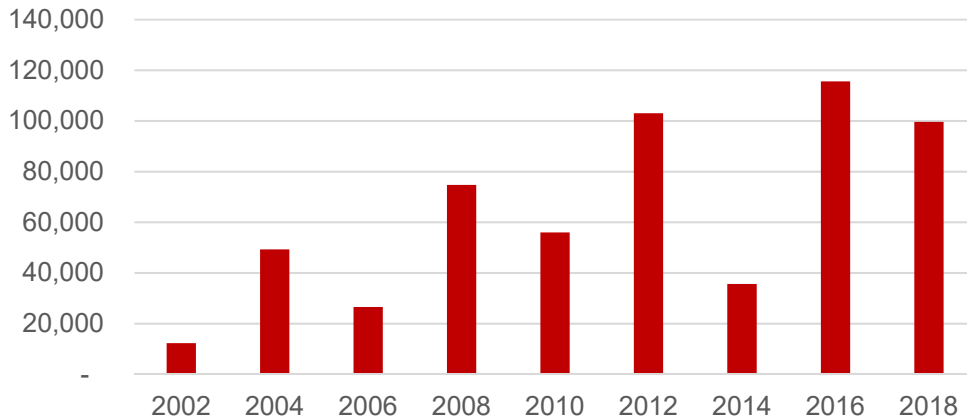


FIGURE 19 PROVISIONAL BALLOTS CAST (NOVEMBER ELECTION)

The move to the Vote Center Model is expected to considerably reduce the number of provisional ballots cast during future election cycles as each vote center will be furnished with the equipment and technology necessary to address many of the scenarios that have historically led to provisional voting. Using the November 2018 General Election as an example, transitioning to a Vote Center Model would reduce the 99,591 provisional ballots cast by over 80%. This benefits not only the voter who would be allowed to cast a regular ballot and have it immediately counted when the ballot is returned to the ROV, but it would eliminate the need for the ROV to take the onerous steps to validate, possibly redact/remake and count an otherwise qualified ballot. That is, the ROV's post-election activities would solely focus on those

¹¹ The highest number of provisional ballots cast was 115,617 during the November 2016 election.

provisional ballot situations where the ROV is unable to determine the disposition of the voter's issued mail ballot.

Under the Vote Center Model, the expected decrease in the number of provisional ballots cast will likely be offset, to some extent, by the increase in Conditional Voter Registration (CVR) activity. As referenced in "Our Changing Environment" of this Study, new CVR laws has had an additional impact on the administration of elections.

Under the current model, CVR allows voters to conditionally register and cast a provisional ballot beginning 14 days before an election through the closing of the polls at 8 pm on election day at all permanent locations of the elections official, and this service may be offered at ad-hoc satellite locations should they be established. However, counties who subscribe to the Vote Center Model must offer CVR at every established vote center. Given that CVR voting under vote center rules is so new, there is limited predictive data available. However, in 2018, there were five California counties (Madera, Napa, Nevada, Sacramento, and San Mateo) that conducted elections under the Vote Center Model. They give some insight on the extent individuals may exercise this option in the future. According to the California Secretary of State, there were 57,275 CVR ballots cast in California during the 2018 general election.¹² Out of the 57,275 CVR ballots cast, "these five VCA counties accounted for 32% of the valid CVR ballots cast, even though those counties accounted for less than 7% of the state's registered voters at the time. The five VCA counties were among the six counties that had the highest use of CVR as a percentage of the county's registered voters."¹³ Similarly, the County of San Diego saw a significant use of CVR voting at its single location offering this service. During the 2018 General Election, San Diego County voters cast 2,353 CVR ballots at the ROV Office. With Senate Bill 72 awaiting the Governor's signature, the ROV expects CVR activity to increase sharply.

In order to mitigate the impact associated with the expected increase in CVR voting volume, the ROV plans to pilot the use of e-poll books, which are hand held "iPad like" devices that enable election workers to review and/or maintain voter registration information for an election, in near real-time. The use of this tool is expected to streamline the registration process for CVR voters. The ROV also plans to initiate the use of new scanning procedures at its back-office operations, which will provide election workers with the capability to separate CVR ballots from other types of ballots so they can be processed separately in their own work stream. Doing so will alleviate some of the additional effort involved in the voter lookup process and other ballot eligibility verification procedures required when processing this type of ballot.

CVR does offset the amount of time to process provisional ballots that were cast under the auspices of the individual not being registered. Technically, under Senate Bill 72, anyone who votes would have done so conditionally and therefore be registered to vote. The only time is when the CVR envelope was not properly executed by the individual.

¹² California Secretary of State (2019). *Secretary Padilla Publishes Reports on Conditional Voter Registration and Provisional Ballot Use in November 2018 General Election* (Publication No. AP19:031), <https://admin.cdn.sos.ca.gov/press-releases/2019/ap19-031.pdf>

¹³ California. Legislature. Assembly. *Requires conditional voter registration (CVR, a.k.a., "same day" registration) to be available at all polling places. (SB 72) Umberg, Amended 17 May 2019. California State Assembly. Reg. Sess. (June 19, 2019)* https://aelc.assembly.ca.gov/sites/aelc.assembly.ca.gov/files/201920200SB72_SB_72_SBPCA_05-17-2019_Sen._Assembly_Elections_And_Redistricting_Committee_93288.pdf

Voter Outreach & Education

The ROV is fortunate to already have a robust voter outreach and education program that can be used should the County transition to the Vote Center Model. The following summary describes where the department's current activities, with minor adjustments in messaging, meets the minimum requirements of the Vote Center Model and where the department will need additional resources to comply:

1. Use of media, including social media, newspapers, radio, and television informing voters of the upcoming election and promoting the toll-free voter assistance hotline.

This requirement is being met within the ROV's existing outreach programs. However, additional resources are recommended in order to broaden and increase the frequency of messaging across all media platforms.

2. Use of media, including social media, newspapers, radio, and television for purposes of informing voters of the availability of a vote by mail ballot in an accessible format and the process for requesting such a ballot.

This requirement is being met through the ROV's purchase of a new voting system which includes a Remote Accessible Vote by Mail (RAVBM) module. Current messaging related to accessible voting will be adjusted for the 2020 election cycles to include the availability of this service and how to sign up.

3. Community presence to educate voters regarding the Voter's Choice Act (VCA).

The ROV's outreach programs are well established and have a strong community presence targeting both general outreach and specific needs related to language and accessibility. The department will only need to add the Vote Center Model material to an already successful program.

In addition, the ROV has an established Voter Accessibility Advisory Committee (VAAC) and Language Accessibility Advisory Committee (LAAC) that meet regularly.

4. Accessible information publicly available on an accessible Internet Web site of the county elections official.

The ROV will request County resources to ensure its website is and remains accessible.

5. Identify language minority voters.

This requirement is met through the ROV's work with its Language Accessibility Advisory Committee. However, the ROV will need additional resources to enhance these efforts.

6. Educate and communicate the provisions of the Voter's Choice Act (VCA) to the public, including:

- a. Communities for which the county is required to provide voting materials and assistance in a language other than English under subdivision (a) of Section 14201 and the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.).**

The ROV is currently required to provide translated election-related materials in four of the five federally mandated languages (Spanish, Filipino, Vietnamese and Chinese). Kumeyaay translation is not provided at the request of the Sycuan Band of the Kumeyaay Nation.

Additional resources would be needed due to the requirement to also provide translated materials related to the Vote Center Model in the State required languages (Korean and Arabic).

- 7. How a voter with disabilities may request and receive a blank vote by mail ballot and, if a replacement ballot is necessary, a blank replacement ballot that a voter with disabilities can mark privately and independently.**

This requirement is met with the ROV's new Secretary of State certified voting system and will be in place for 2020 and future election cycles.

- 8. Address significant disparities in voter accessibility and participation.**

This requirement is met through the ROV's work with its Voter Accessibility Advisory Committee. However, the ROV will need additional resources to enhance these efforts and add workshops to educate and empower voters with the new service provided under the Vote Center Model.

- 9. Shall solicit public input regarding which vote centers should be staffed by election board members who are fluent in a language in addition to English pursuant to subdivision (c) of Section 12303 and Section 203 of the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.).**

The ROV has an existing process for recruiting and training bilingual poll workers. This same approach will be used to hire and train bilingual election workers. Each of the County's four federally required languages will be represented at each voter center, and the two state required languages will be placed at targeted locations.

- 10. Shall provide notice in the sample ballot, in vote by mail materials, and on his or her Internet Web site of the specific language services available at each vote center.**

The ROV can meet this requirement in its existing program.

- 11. Each vote center provides election materials translated in all languages required in the jurisdiction under subdivision (a) of Section 14201 and Section 203 of the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.).**

This requirement is met under the ROV's existing program.

- 12. Each vote center provides reasonable modifications and auxiliary aids and services as required by the federal Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 12101 et seq.) and the federal Rehabilitation Act of 1973 (29 U.S.C. Sec. 701 et seq.).**

This requirement is met under the department's existing program.

- 13. Upon request, the county elections official provides written voting materials to voters with disabilities in an accessible format, as required by the federal Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 12101 et seq.) and the federal Rehabilitation Act of 1973 (29 U.S.C. Sec. 701 et seq.).**

This requirement is met under the ROV's existing Secretary of State certified voting system.

- 14. The county elections official establishes a language accessibility advisory committee that is comprised of representatives of language minority communities. The committee shall be established no later than October 1 of the year before the first election conducted pursuant to this section. The committee shall hold its first meeting no later than April 1 of the year in which the first election is conducted pursuant to this section.**

The ROV has a long established Language Accessibility Advisory Committee.

- 15. The county elections official establishes a voting accessibility advisory committee that is comprised of voters with disabilities. The committee shall be established no later than**

October 1 of the year before the first election conducted pursuant to this section. The committee shall hold its first meeting no later than April 1 of the year in which the first election is conducted pursuant to this section.

The ROV has a long established Voter Accessibility Advisory Committee.

- 16. The county elections official shall hold at least one bilingual voter education workshop for each language in which the county is required to provide voting materials and assistance in a language other than English under subdivision (a) of Section 14201 and the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.).**

The ROV currently conducts voter workshops in its current language program; however, workshops will need to be expanded to Native American, Korean and Arabic languages.

- 17. The disability community, including organizations and individuals that advocate on behalf of, or provide services to, individuals with disabilities. The county elections official shall hold at least one voter education workshop to increase accessibility and participation of eligible voters with disabilities.**

The ROV will require additional resources to host, procure and staff a location for one workshop targeting voters with disabilities. The ROV would also recommend additional workshops targeting this community and organizations that assist persons with disabilities.

- 18. The county elections official develops a draft plan for the administration of elections conducted pursuant to this section in consultation with the public, including both of the following:**

- a. One meeting, publicly noticed at least 10 days in advance of the meeting, that includes representatives, advocates, and other stakeholders representing each community for which the county is required to provide voting materials and assistance in a language other than English under subdivision (a) of Section 14201 and the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.).**

The ROV will require additional resources to host, procure and staff a location for seven publicly noticed meetings for representatives from each language community and community organizations and individuals that advocate on behalf of, or provide services to, individuals with limited English proficiency.

- b. One meeting, publicly noticed at least 10 days in advance of the meeting, that includes representatives from the disability community and community organizations and individuals that advocate on behalf of, or provide services to, individuals with disabilities.**

The ROV will require additional resources to host, procure and staff a location for one publicly noticed meeting for representatives from the disability community and community organizations and individuals that advocate on behalf of, or provide services to, individuals with disabilities.

- 19. At least one public service announcement in the media, including newspapers, radio, and television, that serve English-speaking citizens for purposes of informing voters of the upcoming election and promoting the toll-free voter assistance hotline. Outreach made under this subclause shall include access for voters who are deaf or hard of hearing and voters who are blind or visually impaired.**

The ROV's existing program can absorb the general requirement of providing one PSA in the media, including newspaper, radio and television, but will require additional resources to develop materials and PSAs for voters who are deaf or hard of hearing and voters who are blind or visually impaired.

- 20. At least one public service announcement in the media, including newspapers, radio, and television, that serve non-English-speaking citizens for each language in which the county is required to provide voting materials and assistance under subdivision (a) of Section 14201 and the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.) for purposes of informing voters of the upcoming election and promoting the toll-free voter assistance hotline.**

The ROV's existing program can absorb the general requirement of providing one PSA in the media, including newspaper, radio and television for the County's federally covered languages but will require additional resources to develop materials and PSAs for the County's state required language (Korean and Arabic).

- 21. The county elections official delivers to each voter, with either the sample ballot sent pursuant to Section 13303 or with the vote by mail ballot packet, all the following:**

- a. A notice, translated in all languages required under subdivision (a) of Section 14201 and Section 203 of the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.), that informs voters of all the following:**
- **An all-mailed ballot election is being conducted and each eligible voter will be issued a vote by mail ballot by mail.**
 - **The voter may cast a vote by mail ballot in person at a vote center during the times and days specified in subparagraph (A) of paragraph (4) or on election day.**
 - **No later than seven days before the day of the election, the voter may request the county elections official to send a vote by mail ballot in a language other than English pursuant to Section 203 of the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.) or a facsimile copy of the ballot printed in a language other than English pursuant to Section 14201.**
 - **No later than seven days before the day of the election, the voter may request the county elections official to send or deliver a ballot that voters with disabilities can read and mark privately and independently pursuant to the federal Help America Vote Act of 2002 (52 U.S.C. Sec. 20901 et seq.).**

The ROV will require additional resources to comply with this noticing requirement. Additional costs would include translation into six languages, proofing, printing and mailing.

- b. A list of the ballot drop-off locations and vote centers established pursuant to this section, including the dates and hours they are open. The list shall also be posted on the Internet Web site of the county elections official in a format that is accessible for people with disabilities pursuant to Section 11135 of the Government Code.**

The ROV does post a list of its mail ballot drop-off locations on its website but will require additional resources to create this list in an accessible format.

- c. A postage-paid postcard that the voter may return to the county elections official for the purpose of requesting a vote by mail ballot in a language other than English or for the purpose of requesting a vote by mail ballot in an accessible format.**

The ROV will require additional resources to institute this new postcard requirement. Additional costs may include translation into six languages, proofing, printing and return postage.

d. At least two direct contacts with voters for purposes of informing voters of the upcoming election and promoting the toll-free voter assistance hotline.

The ROV will require additional resources to meet this requirement. through the sample ballot and mail ballot packet mailings. Additional resources may be recommended if separate mailings are required.

In as much as the ROV has a robust voter education and outreach program, a transition to the Vote Center Model would require additional voter education and outreach. A key point to consider when looking at existing data is how voters are interacting with established polling places. Although 72% of registered voters receive a mail ballot, and the predominant number of ballots cast in an election are mail ballots, the number of voters who vote at a polling place or use the polling place to drop off their mail ballot is more than half of all registered voters. For example, in the 2018 Gubernatorial General Election, 1,173,924 registered voters cast a ballot. Of that number 68.5% were mail ballots, and 31.5% were cast at a polling place. Looking closer at those who voted a mail ballot, 30.6% dropped their ballot at a polling place on election day. The result is that 52.5% of voters used a polling place.

Whether or not such new policies, like pre-paid postage, will incentivize voters to change their behavior, additional investment will be needed during the first year of conducting Vote Center Model elections to educate voters on their options to return their mail ballots at locations other than their traditional polling places.

Voter Turnout

As mentioned, the county has consistently shown robust voter turnout during statewide general elections. In the 2008 Presidential General Election, 84% of registered voters voted. In the 2016 Presidential General Election, 81.5% of registered voters cast a ballot. In 2018, the county had the highest gubernatorial voter turnout in a 32-year period with 66.4% of registered voters casting a ballot.

As Senate Bill 450, the Vote Center Model bill, was being considered, there was a concern among advocacy groups as to the possible reduction in voter turnout that could occur as a result of such a dramatic change. Some feared the adoption of the Vote Center Model could depress voter turnout, particularly in specific voting populations. From the studies, there appears to be common agreement that, although more data is needed to determine if the Model would increase voter turnout, the Vote Center Model did not have an adverse effect on voter turnout.

According to the University of California's New Electorate Project, Vote Center Model adoption in 2018 by the five participating counties "led to modest yet significant increases in turnout by eligible voters of approximately three percentage points in the primary and general elections."¹⁴ Although promising, this does not mean that a Vote Center Model will increase voter turnout in San Diego County.

When making these comparisons, voter turnout by these research papers were based not on the registered voter population, but on the eligible voter population. Using this numerator as the baseline, San Diego County voter turnout in the 2018 General Election was 1.3% below that of the average of the five pilot vote center counties.

¹⁴ Kousser, Thad, et al. "New Electorate Study: How Did the Voter's Choice Act Affect Turnout in 2018". New Electorate Project, University of California Office of the President, 2019, <https://www.voteathome.org/wp-content/uploads/2019/04/How-Did-the-VCA-Affect-Turnout.pdf>

Neither the 3% nor the 1.3% should be considered conclusive of the Vote Center Model's benefits to voter turnout.

More data under a Vote Center Model is needed to come to any definitive conclusion on voter turnout, particularly as it relates to San Diego. Having the second largest voter population in the state, the data and demographics of the initial five Vote Center Model counties is not necessarily representative of the size, demographics and behavior of the county. In order to gain a better understanding of the Vote Center Model's impact to San Diego, a more representative voter population across the state is needed. With 15 counties adopting the Vote Center Model in 2020, including Los Angeles County and Orange County, a more representative voter population that parallels that of San Diego County will emerge and inform the County on voter turnout. Equally as important, it will also inform the County on a host of other administrative, technical and legal considerations that need to be weighed before implementing such a Model.

Although turnout is unknown at this time, the Vote Center Model does provide a higher level of access and convenience to voters. Quoting the Secretary of State's June 2018 Report on the five pilot Vote Center Model counties, "While any lasting change in voter registration and turnout will only be evident after several election cycles, the VCA [Vote Center Model] expanded accessibility to the ballot, and yielded more voting options and opportunities for Californians to register and vote. Voters in VCA counties have more ways to vote, more time to vote, and more locations where they can vote."¹⁵

¹⁵ CEIR, *California Voter's Choice Act – June 5, 2018 Primary Election Report*, iv.

Cost Analysis

As laid out in the Study, there are multiple trade-offs in transitioning from a Polling Place Model to a Vote Center Model. Where the Study found cost reductions in specific areas, there were offsetting increases in others. When taking all of these into account, the requirements under the Vote Center Model and the requirements under new state mandates, an increase to the overall cost of conducting elections is anticipated. The following breaks down the cost of conducting an election under the Vote Center Model.

Assumptions

Cost assumptions are categorized as follows:

- The total number of registered voters was based on the August 2019 active registered report – 1,788,042.
- The total number of mail ballots to be issued would increase by 28% (or 502,933).
- The mail ballot return percentage via USPS is 60% and the remaining mail ballots would be returned via mail ballot drop-off or in person.
- The lease cost for vote centers is \$100 per day.
- Staffing at each vote center is scaled up through the 11-day voting period.
- An extensive voter education and outreach effort is planned.

Based on the assumptions listed above and throughout the Study, it is estimated that approximately \$12.0M of one-time costs will be required to transition from the Polling Place Model to the Vote Center Model. Costs include purchasing additional equipment and supplies, siting and surveying locations for vote centers, providing public notice and input, and educating voters.

- Equipment & Supplies - \$9.0M
- Election Administration Plan/Voter Education & Outreach/Public Noticing and Input - \$2.5M
- Vote Centers Siting - \$0.3M
- Miscellaneous - \$0.2M

It is projected that about \$11.8M of one-time costs will be reimbursable through federal and state funding (see “Funding Consideration”).

The projected ongoing costs to conduct elections under the Vote Center Model is approximately \$17.5M - \$18.5M per statewide election. There are several external factors that may increase costs, such as additional legislative mandates, number of measures and candidates appearing on the ballot pushing it to a two-card ballot, voter interest and participation, and labor contracts. It is anticipated that the ROV’s annual budget can absorb about 85% - 95% of the projected ongoing costs of conducting elections under the Vote Center Model.

If the provisions that govern the Vote Center Model are amended per the “Recommendations” section, the County could save approximately \$1.0M - \$2.0M per statewide election.

Cost Comparison

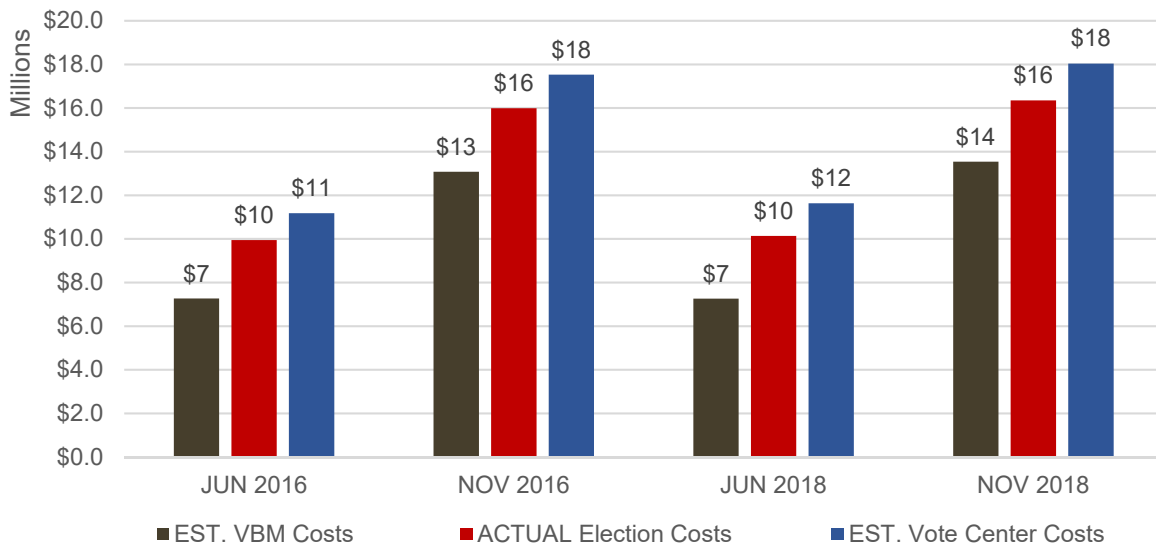
A cost comparison analysis was conducted on three models of voting:

- an All-Mail Ballot Model (“Oregon Model”) where all voters would receive a mail ballot; however, no vote centers or polling places would be established;
- the current traditional Polling Place Model; and
- the Vote Center Model

It should be noted that although an All-Mail Ballot Model was analyzed, it is not legally authorized for regularly scheduled statewide elections. The County Charter does provide for an all-mail ballot election option for Board of Supervisor special vacancy elections; however, this option was not studied as it does not relate.¹⁶

In conducting the analysis, the actual election costs from the last four statewide elections was used. Then, labor costs related to the hiring and management of poll workers, poll supplies, and poll stipends were removed from the actuals to come up with an estimated cost of an all-mail ballot election.

For the Vote Center Model, using the same starting point, actual election costs from the last four statewide elections was used. Costs pertaining to a Polling Place Model were then removed, and labor and services and supplies related to the Vote Center Model were added to come up with an estimated cost to make a comparison.



**FIGURE 20 COMPARATIVE COST ANALYSIS
ALL-MAIL BALLOT VS. POLLING PLACE MODEL VS. VOTE CENTER MODEL**

¹⁶ *Charter of the County of San Diego*, Section 401.4 (November 2018)

Funding Consideration

The ROV currently has \$32.7M in federal and state monies. Table 3 breaks down the specific funding sources by amount, matching criteria, and expiration date.

	<i>HAVA</i>	<i>Voting Modernization Bond (Prop 41)</i>	<i>State 2018-19 Allocation (AB 1824)</i>	<i>Voting System Replacement</i>	<i>EMS Replacement</i>	<i>TOTAL</i>
Expires	<i>6/30/2021</i>	<i>3:1 match</i>	<i>3:1 match 6/30/2021</i>	<i>3:1 match 6/30/2022</i>	<i>3:1 match 6/30/2022</i>	
Balance	\$7,623,341	\$7,497,479	\$10,685,000	\$5,342,500	\$1,572,645	\$32,720,965

TABLE 3 STATE & FEDERAL ALLOCATION

Approximately \$14.2M of the funds are earmarked for the new voting system and another \$2.0M for the replacement of the voter registration election management system (EMS). The remaining federal and state funds can be used to pay for the \$11.8M of one-time costs to transition to a Vote Center Model. If it is determined that there are additional one-time costs during implementation that are not included in this Study, the ROV still has federal and state funds available for reimbursement as long as they meet the requirements of the funding agency.

Although the current HAVA agreement expires on June 30, 2021, the Secretary of State has extended the contract several times as long as the County still has funding available. There are no matching requirements to use HAVA funding. The plan is to use HAVA monies to match the other sources of funding.

The State 2018-19 Allocation of \$10.7M expires on June 30, 2021. It originally had a 1:1 match, but the State amended the agreement in FY 2019-20 to increase the match to 3:1. In addition, the state legislature also provided another \$5.3M for the replacement of the voting system. The expiration date for the second allocation is June 30, 2022 and has 3:1 match.

The Voting Modernization Board (VMB) Proposition 41 funds can only be used for the expansion of the voting system, which limits its potential for reimbursement. Additionally, the VMB has within its authority to sweep any existing county balances and reallocate those funds at any time. With these balances being almost 17 years old, the likelihood of this occurring rises. It also has a 3:1 match.

Feasibility - 2020 Vote Center Pilot

Establishing Satellite Locations

Current law differentiates vote centers from that of satellite locations. When speaking of vote centers, they are specific to the Vote Center Model and all of the requirements outlined in Elections Code 4005. As a result, discussing the implementation plan and feasibility of “pilot vote centers” is not legally authorized. Instead, discussing the adoption of satellite locations, as found under Elections Code 3018, is permissible and more applicable to the County in gaining a better understanding of how a transition to a Vote Center Model would occur.

The reason why the ROV has not considered satellite locations in prior elections is a result of the lack of a certified voting system that can manage the complexity of the County’s elections. With the recent purchase of a Secretary of State certified voting system, the ROV can entertain the option for the 2020 election cycle.

Satellite locations are similar to vote centers in providing comparable services; however, they do not have the same requirements outlined in the Vote Center Model, such as the registered voter threshold provisions or required number of days the sites must be available. Satellite locations are not a substitute or a replacement for polling places. They should be viewed as an extension of the ROV’s main office in whatever model selected.

The ROV has thoughtfully analyzed the actions necessary to extend the operations beyond the Registrar of Voter’s Office and into other parts of the county. The following outlines the implementation plan necessary to adopt nine satellite locations; however, to manage risk the ROV is recommending the adoption of four of the nine satellite locations for the March 3, 2020 Presidential Primary Election.

Whether four or nine, the satellite locations are not meant to cover the geographic area of the county, but to provide sufficient coverage to ensure the ROV gains as much experience, data and understanding in how implementing a full-scale Vote Center Model would occur. The ROV was highly cognizant in adopting a sufficient number of satellite locations which would allow the County to learn, but, more importantly, not draw resources away from and interfere with the core mission of ensuring the estimated 1,600+ voting precincts on election day are open and running optimally. After examining the nine locations and placing a six-mile buffer around each location about 78% (1.4M) of today’s voters would be covered. Extending to four locations, the buffer would cover 60% (1.1M) of the county’s registered voters.

On election day, it is expected that voters will go to their assigned polling place and those who need additional services (e.g. CVR) will be able to go to one of the established satellite locations. Should long lines form at a satellite location, voters will be informed that they can go to their assigned polling place to vote.

Locations

The goal of the satellite locations is to gain a better understanding of what it will take to adopt a Vote Center Model - being mindful that the few locations to be selected must be able to serve a higher volume of voters. In so doing, the ROV intentionally sited locations that were much larger than what a typical vote center would be in a full-scale roll out of the Model. The ROV looked at the prerequisites necessary to

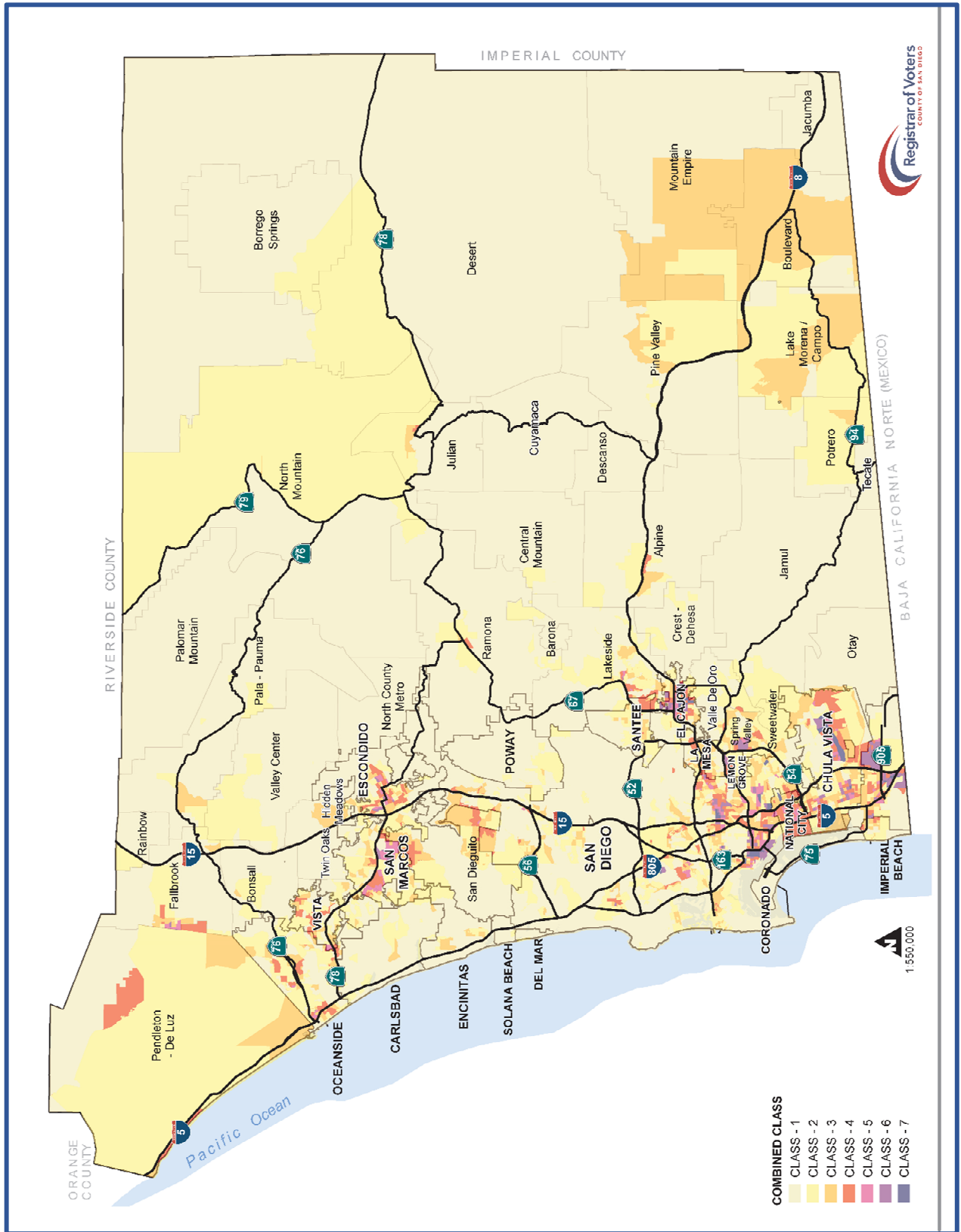
hold a successful pilot and determined that it must model closely to how the ROV currently provides services. As such, each location must have:

- 2,500 sq. ft. to 3,000 sq. ft. in usable space
- Sufficient parking
- Power (lights and electrical outlets)
- Met accessible requirements
- Restrooms
- Available for 14 days

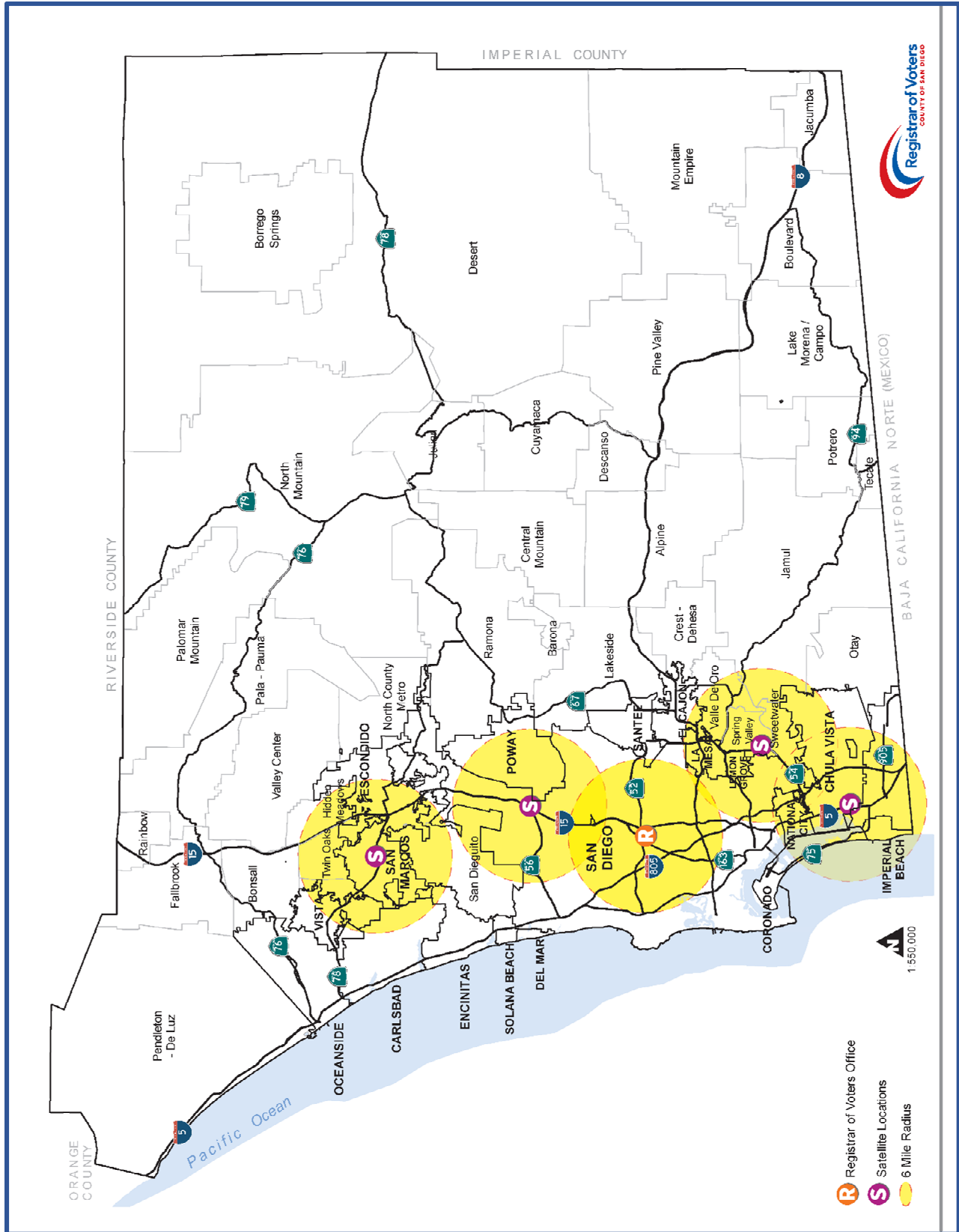
In addition, the ROV studied locations based on nine of the 14 factors when siting vote centers under the Vote Center Model. Individual criteria maps of these factors (sans public transit and free parking) can be found in Appendix C. These include:

- Proximity to public transit (< 1,500 feet from a transit stop)
- Proximity to communities with historically low vote by mail usage
- Proximity to population centers
- Proximity to language minority communities
- Proximity to low income communities
- Proximity to voters with disabilities
- Proximity to communities with low rates of vehicle ownership
- Proximity to communities of eligible voters that are not registered
- Access to free parking

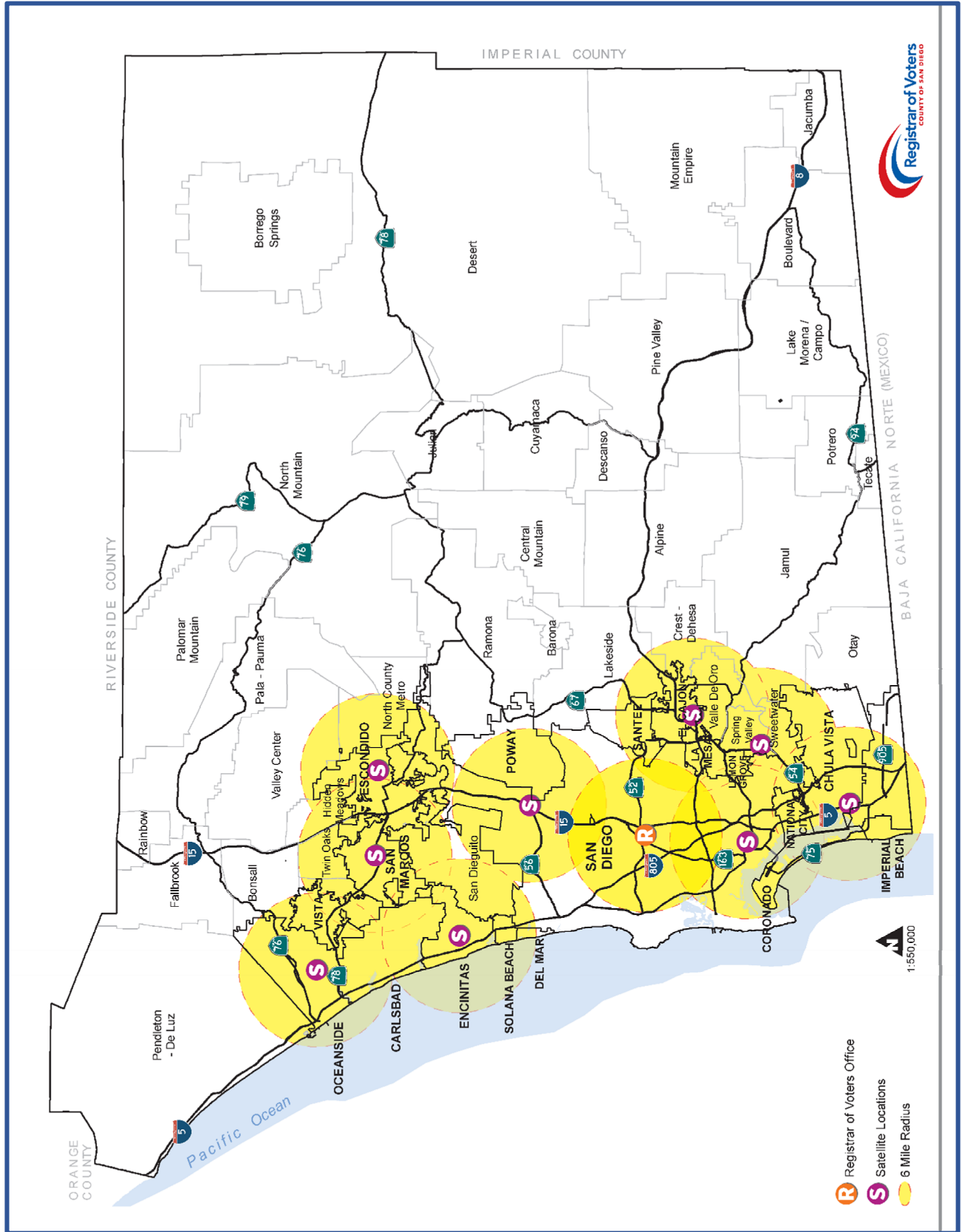
After reviewing existing polling places, the ROV expanded its search to other public facilities within the county that would fit the nine factors. The “heat” map on the following page is created when overlaying these factors. The outcome of this resulted in identifying the recommended areas for the four satellite locations. Additionally, a map of nine locations is provided should that be considered.



HEAT MAP – VOTE CENTER SITING FACTORS (OVERLAY)



SATELLITE LOCATIONS (4) - RECOMMENDED



SATELLITE LOCATIONS (9)

Staffing & Training

At each of the satellite locations, it is contemplated 26 seasonal election workers would be required. Based on the workflow of the satellite locations, seasonal election workers would be recruited and assigned to work in one of six capacities:

1	Manager
4	Coordinators
2	Greeters
2	BMD Assistants
10	Check-In Members
5	Conditional Voter Registration
2	Check-Out Members

Once onboarded, satellite managers would participate in the ROV's train-the-trainer bootcamp and, thereafter, participate in a one week on-the-job-training at the ROV. Managers would then be responsible for conducting a one-week onsite training program for their assigned satellite team members (25) before the first day's opening.

In order to identify and hire a range of 104 - 234 satellite workers and to ensure the proper management of each satellite location, the ROV would work with the Department of Human Resources to recruit additional seasonal election workers and to identify four County employees to work in the capacity of a coordinator at each location. Satellite managers and coordinators would work closely to ensure proper administrative tasks are completed.

Hours of Operation

Satellite locations would be open the Saturday, Sunday and Monday before election day. The ROV will work with public facility owners to open from 8 am to 5 pm each day.

On election day, the hours will extend to the 13-hour period the polls are open.

Security

To ensure maximum security, there will be daily pickups of voted ballots, including mail ballots dropped off at each satellite location. The ROV will incorporate the additional satellite locations to the daily pickup route that is currently in place for the Mail Ballot Drop-Off Program. The ROV will also work with the facility to ensure the room used will be physically secured each night. In addition, the ROV will establish the necessary security and chain-of-custody documents to account for every ballot cast at the site. This includes:

- Use of tamper evident seals and locks on sensitive voting equipment;
- Securing all e-poll books at closing;
- Establish chain-of-custody documents for the proper handling of voting equipment and supplies, particularly as they relate to the BMD and the necessary devices needed to operate it, e-poll books and voted ballots;
- Conduct daily accounting of ballots cast on each device;
- Ensuring transparency for public observation; and

- Security would be brought on at each location.

Equipment & Supplies

The ROV has identified a list of equipment and supplies necessary to properly execute a satellite location. Main components include:

- Ballot Marking Devices (40-50)
- Connectivity solution (1)
- Electronic Poll Books with label printers (16)
- Generator
- Laptops with ancillary voter card burner (15)

Cost

The ROV estimates the overall cost of running the recommended four satellite locations to be approximately \$800K to \$900K. Nine locations would be approximately \$1.7M to \$1.8M. The following is the breakdown of anticipated cost:

<i>2020 Satellite Locations</i>	<i>4 locations</i>	<i>9 locations</i>
Salaries & Employee Benefits	\$300K - \$350K	\$600K - \$650K
Services & Supplies	\$500K - \$550K	\$1.10M - \$1.15M

A recommendation will be made to establish appropriations in the amount of \$900K to adjust the Fiscal Year 2019-20 Operational Plan for the March 3, 2020 Presidential Primary Election to implement four satellite locations.

Recommendations

As described, the Vote Center Model provides another option to counties; however, the trade-offs or newness may not provide the value necessary for counties to opt-in. As the election official for the county, there are a number of recommendations that would balance the move in favor of the Vote Center Model. By accepting these recommendations, the County will ensure contemplative steps are taken to retain its robust turnout, be inclusive to all voter populations and map a strong and sustainable election path for the future.

Recommendation 1A: Establishment of Vote Centers

After analyzing data from the 2020 election cycle, consider supporting passage of state legislation to lower the ratio of vote centers to voters than the current 1:10,000.

Based on the data generated from the 2020 election cycle, coupled with the existing data from the 2018 election cycle, the ratio of vote centers to voters should be reconsidered to maximize the ability for an election official to adjust the number of vote centers based on the adoption and return rate of mail ballots and the usage of in-person voting at the vote centers.

Recommendation 1B: Availability of Vote Centers

Support passage of state legislation to revise the opening of the vote centers to a lesser number of days than the current 10-day provision and 3-day provision required.

It is clear that voters have a tendency to act more closely to election day. Data consistently shows that although services are provided year-round and mail balloting and in-office voting begins 29-days before election day, volume spikes the day prior to and on election day, leaving the other days with low voter usage. As demonstrated by the daily volume of voters in the five Vote Center Model counties in 2018 (Figure 21) during the 11-day period (including election day), voters overwhelmingly visited a vote center the day before and on election day.

Vote Center Daily Returns

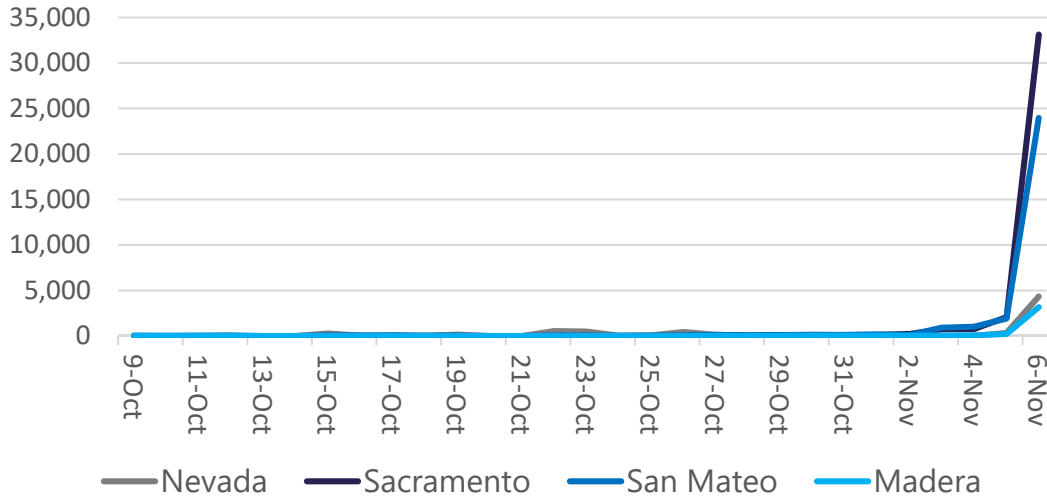


FIGURE 21 2018 GENERAL ELECTION - PILOT VOTE CENTER COUNTIES¹⁷

Existing data demonstrates similar voter behavior occurring in a Polling Place Model suggesting that regardless of voting model, low rates of use will continue to occur until several days before the election. This is demonstrated in Figure 22, where during the November 2018 election, there was a spike of mail ballots being returned to the ROV office the day before and day of the election. Furthermore, data from prior elections reinforces this trend. There is no reason to believe that the 2020 election cycle will demonstrate voter trends counter to what has been experienced for many years; however, there is also no reason to rush. Allowing the November 2020 election to pass will provide further guidance on whether this trend holds in what is expected to be a high-volume high-turnout election with a healthy balance of counties conducting their election in either the Vote Center Model or Polling Place Model.

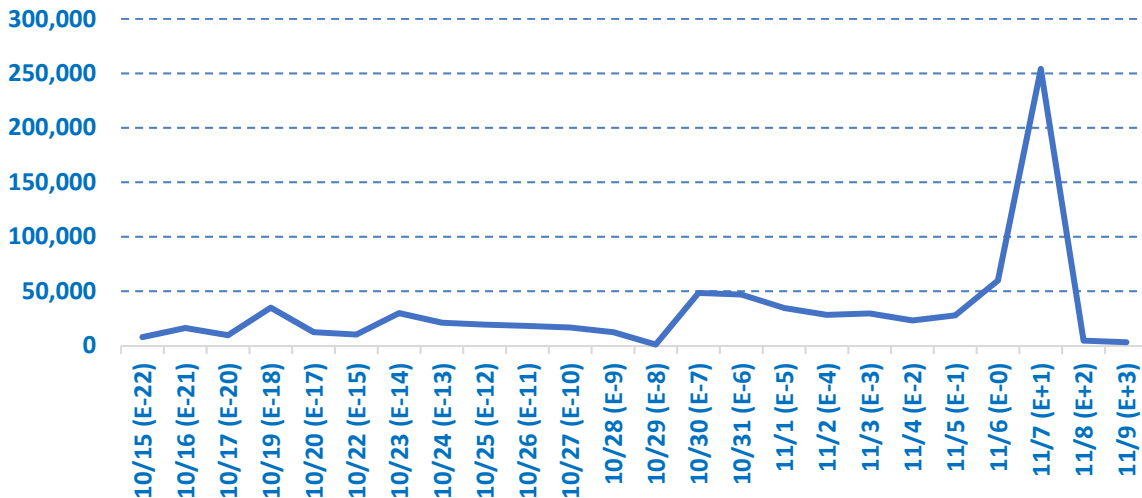


FIGURE 22 SAN DIEGO COUNTY DAILY RETURNS OF MAIL BALLOTS (NOVEMBER 2018)

¹⁷ CEIR, *California Voter's Choice Act*, <https://elections.cdn.sos.ca.gov/vca/4.12.presentations/ceir-vca-debrief.pptx>.

The provisions outlining these requirements should be amended to fashion itself toward this data trend. Should prevailing voter behavior swing in the opposite direction, election officials will have the latitude to adjust and increase the amount of days to be open and the number of locations to establish.

Recommendation 2: Establishment and Availability of Mail Ballot Drop-Off Locations/Boxes

Support passage of state legislation to revise the threshold of mail ballot drop-off locations from 1:15,000 to 1:30,000 and revise the number of days mail ballot drop-off locations/boxes are available from 28 days before election day to 8 days before election day (as a minimum).

There exists a well-managed and reliable infrastructure for receiving mail, the United States Postal Service (USPS). The USPS currently picks up from 2,289 collection boxes throughout San Diego County every day except Sunday. This infrastructure should be fully leveraged before requiring mail ballot drop-off locations beyond the recommended 1:30,000 threshold and 8-day availability.

Beyond the existing USPS infrastructure, this recommendation is further supported by the 2018 legislation requiring counties provide pre-paid return postage to all returning mail ballots - eliminating the need for any voter to place postage on their return envelope.

Finally, state statutes further protect voters by allowing any mail ballot to be counted as long as it is received three days after election day and postmarked before or by election day. Additionally, mail ballots that are unsigned or signatures that are deemed non-matching can be cured by the voter up to two days before the election official certifies the election.

Recommendation 3: Voter Education & Outreach (Direct Mailers, Notifications, Workshops, etc.)

Support passage of state legislation to amend Vote Center Model provisions requiring notices, workshops and direct mailers.

These provisions should be sunset after the first general election conducted under the Vote Center Model - retaining the practice of embedding vote center information in sample ballot & voter information pamphlets, mail ballot packets and ROV websites.

Recommendation 4: Special Elections

Support passage of state legislation to revise special election provisions under the Vote Center Model.

Similar to Recommendations 1 and 2, the current statutes for special elections should be revised to a lower ratio of drop-off boxes/locations to voters, and voter centers to voters.

It is recommended that special elections be aligned to similar provisions outlined in Elections Code 4000.5 - San Diego County's special mail ballot election pilot program. By allowing for a separate special election framework than currently provided, local election officials will be granted more authority in determining vote center needs (e.g. number of vote centers, number of ballot drop boxes/locations and number of days available, etc.) in a special election by using driving factors of the election, including local voter data.

Recommendation 5: Satellite Locations Over Unauthorized Pilot Vote Centers

Approve funding for the establishment of four satellite locations for the March 3, 2020 Presidential Primary Election and, should the ROV determine additional satellite locations are needed, approve such funding for the November 3, 2020 Presidential General Election.

Establishing satellite locations pursuant to Elections Code 3018, in-lieu of unauthorized establishment of pilot vote centers will assist the ROV in managing the upcoming election where new state mandates, like Senate Bill 72 – expansion of conditional voter registration at polling places, are anticipated to pose additional risk to an already administratively complex election. ROV would establish these satellite locations using many of the siting criteria outlined in Elections Code 4005 for the March 2020 primary and additional locations, as needed, for the November 2020 general. Additionally, the ROV would gain a better understanding of the requirements needed to conduct elections under a Vote Center Model.

Recommendation 6: Vote Center Model Implementation Timeframe

If a transition to the Vote Center Model were to be approved, it is recommended that it occur during a gubernatorial election year – giving voters time to acclimatize to the new environment and reduce the administrative risk of implementation.

Introducing the Vote Center Model to the county would be a transformational initiative. In order to ensure a seamless transition, the basic infrastructure must be in place. This includes surveying and siting of vote centers, increasing human resource support, implementing technology components and launching an effective voter outreach and education plan.

Recommendation 7: Temporary Agencies

Pursue amendments to allow county election officials to use temporary agency personnel for as long as 180 days.

By extending the number of days a temporary agency worker is able to provide services to a county election office, the election official can better manage and draw on needed resources during abrupt and overwhelming workload periods that generally come with the administration of an election.

Feasibility: Independent Audit of Voter Registration List

Acknowledgement: The following study was provided by the Auditor & Controller's – Office of Audits & Advisory Services. In addition, the ROV has provided additional information as they relate to Voter List Maintenance practices under federal and state law.

Background

Voter registration lists are the foundation of election administration. Maintaining accurate and up-to-date voter registration lists allows states to ensure that only eligible voters can cast a ballot, to keep track of who has voted to prevent anyone from voting twice, and to speed up the voter check-in process at polling places by reducing inaccuracies.

Ensuring the accuracy of Voter Registration Lists can involve three actions:

- 1) **Verifying a new voter registration applicant's information.** This is typically accomplished by checking the applicant's information against other databases, such as the Department of Motor Vehicles, or felon database in states where felons are not eligible to vote.
- 2) **Updating information on voter list.** Most frequent updates are required because a voter has moved within the jurisdiction or state, and the address on the voter registration records is no longer where the individual lives.
- 3) **Removing no-longer eligible voters from the list.** If a voter has moved out of the jurisdiction, has become otherwise ineligible, or has passed away a removal process may begin.

The scope of an independent audit should include all three areas listed above to adequately assess the accuracy of the voter registration list.

Regulatory Analysis

Although states set policy on voter registration, they do so under a federal framework that includes the National Voter Registration Act (NVRA) and the Help America Vote Act (HAVA). The NVRA establishes minimum requirements for voter roll maintenance in the form of rules and regulations and allows states to institute other provisions above and beyond the NVRA requirements if they are uniform and non-discriminatory.

The HAVA requires establishment of statewide voter registration databases and sets basic requirements for computerized list maintenance, including:

- Coordinating with state agency records on felon status and deaths
- Removal of duplicates from the computerized list
- Matching protocols to verify new registrant information (by requiring a driver's license number or four last digits of registrant's social security number)

Section 20108.1(d) of the California Code of Regulations defines VoteCal as the Secretary of State's computer application, system and hardware that receives, transmits, and stores voter registration data for

all registered voters in California pursuant to the requirements of Section 303 of HAVA (42 U.S.C S 15483).

An independent audit of the voter registration list should, at a minimum, determine compliance with NVRA and HAVA provisions, and should be performed in compliance with Generally Accepted Government Auditing Standards.

Technology Requirements

An essential objective of an independent audit of the voter registration list would be to validate the VoteCal information to assess its accuracy. In order to comply with Generally Accepted Government Auditing Standards, auditors would require access not only to VoteCal, but also to several other systems and databases that interface with VoteCal to upload, or to validate, voter registration information. VoteCal interfaces with the following agencies: County Election Management Systems, California Department of Corrections and Rehabilitation, California Department of Public Health, California Employment Development Department, and California Department of Motor Vehicles.

Financial Analysis

The audit is estimated to cost between \$87,000 and \$215,000. For reference, in September 2018 Governor Brown requested a performance audit of the DMV Information Technology and Customer Service Functions be performed by the Department of Finance (DOF). To complement their audit, DOF contracted with an Independent Audit firm (Ernst & Young) to conduct a technical assessment of the Motor Voter application. The contract included five deliverables for a total cost of \$417,736.

Organizational Factors

Pursuant to Federal and state laws, the Secretary of State's VoteCal is established as the official statewide voter registration list, and all elections officials are required to use it to determine eligibility to vote, issuance of ballot, and whether to count a ballot.

The San Diego County Charter allows the Board of Supervisors to request an audit of County records and County operations, however, auditing state systems such as VoteCal, and access to systems that interface with VoteCal for the purpose of conducting an audit is not within the jurisdiction of the Board.

Conclusions & Recommendations

Based on the organizational factors above, it is not feasible for the County to perform, or cause an independent audit of the Voter Registration List to be performed.

As an alternative, the County could petition the California Joint Legislative Audit Committee to approve an audit of the Voter Registration List to be performed by the California State Auditor.

List Maintenance Practices

List maintenance of the voter registration rolls is highly regulated both from a federal and state level. Based on these laws, ROV routinely receives information from government sources (e.g. Secretary of State, Bureau of Vital Records, County Assessor, Recorder, County Clerk’s office, state and federal court system, etc.) and from voters in order to maintain voter records. Maintenance occurs daily and includes:

- 1) Updating voter records when the voter re-registers with new information;
- 2) Updating voter records based on National Change of Address (NCOA) information;
- 3) Updating voter records when mail is returned undeliverable (e.g. undeliverable mail ballots);
- 4) Merging duplicate registration records. The statewide voter registration system is programmed to identify high confidence matches and potential matches. A potential match requires the ROV to manually review each record to determine if, in fact, they are one and the same individual. The statewide system automatically merges records that are deemed a high confidence match. Separate from the State, the ROV casts a wider net by running its own duplicate queries to surface additional and potential duplicates. The ROV is extremely careful in merging possible duplicate records to avoid causing a voter to be disenfranchised;
- 5) Removing voters who notify us they no longer live within San Diego County;
- 6) Removing deceased voters when notified by the County Assessor, Recorder, County Clerk’s office or through the statewide voter registration system;
- 7) Removing voters when another election office notifies us the individual has registered to vote in their jurisdiction;
- 8) Removing voters when a state or federal court system notifies us an individual is an incarcerated felon who may also be a registered voter;
- 9) Notifying another California county if a voter from San Diego has moved to their county which allows the voter to remain registered in California;
- 10) Updating voter records through updates provided by the Department of Motor Vehicles.

Converting these maintenance activities into statistics, nearly 900,000 maintenance transactions were completed in 2018, and in 2019 (to-date) nearly 650,000 maintenance transactions have been completed. The following represents the number of records processed in various categories from 2018 to 2019:

Categories	2018 Voter Records Processed	2019 Voter Records Processed (Jan to Aug)
Voter Registration Cards (paper)	94,675	17,211
On-line Voter Registration Forms	431,032	326,853
DMV Electronic Files	40,496	15,019
NCOA Electronic Files	118,556	99,634
Address Confirmation Notices (8-d-2)	24,836	10,891
Address Confirmation Notices (NCOA)	20,083	19,672
Duplicate Records	39,357	85,202
County Health Department - Deceased	21,497	19,786
VoteCal - Deceased	12,752	12,546

Felons	1,718	2,621
Voter Requests	2,222	1,029
Court - Incompetent	377	254
Jury Notice - Deceased	193	73
Jury Notice - Non-Citizen	68	76
Out of County	4,067	2,010
Voter Rights Restored	1,888	606
Undeliverable Voter Notification Cards	20,523	8,897
Undeliverable Address Confirmation Notices	4,974	18,412
Undeliverable Misc.	21,089	5,840
TOTAL	860,403	646,632

In addition, the ROV is proactively addressing new maintenance efforts. The following is a summary of list maintenance activities the ROV has completed or will be pursuing to ensure voter lists continue to be accurate and up to date:

- Completed a major cycle of work after the November 2018 election where nearly 200,000 records were processed.
- Amended policies and procedures as they relate to the cancellation of inactive voters. This is a result of recent US Supreme Court decision in *Husted v. Phillip Randolph Institute* and a settlement agreement between Secretary of State (SOS)/Los Angeles ROV and Judicial Watch, an advocacy group.
- Cancelled 340,000 inactive voters and sending over 292,000 confirmation cards to those inactive voters who did not originally receive a federally compliant confirmation notice based on the latest interpretation of the National Voter Registration Act.
- Tracking the SOS sponsored legislation, Assembly Bill 504 (Berman), that aligns with new court interpretation as cited above. This bill was recently Chaptered into law.
- Adhering to the SOS' updated California National Voter Registration Act Manual. This Manual relates to list maintenance of voter records.
- Mailing a Voter Notification Card (VNC) each time a voter changes their registration record. The voter is asked to confirm their information and contact the department should any piece of information be incorrect.

This year, ROV intends to send a countywide mailer to all registered voters to have them verify their registration information, including registered address, mailing address, mail ballot status, and political party status. This is to address two issues: a) addressing the complexity of the March 2020 Presidential Primary Election where political party decisions will impact a voter's ability to vote on the political party's presidential candidates and/or central committee; b) to address issues related to the State's implementation of the New Motor Voter law.

Additionally, the ROV is a participant on the State's Business Process Committee – a joint effort between the California Association of Clerks & Election Officials (CACEO) and the Secretary of State. This committee addresses issues with the State's statewide voter registration database.

Conclusion

Should the Board of Supervisors authorize the transition, the Registrar of Voters stands ready to pursue the Vote Center Model. The Registrar of Voters is already in compliance with most of the Vote Center Model provisions and will be able to absorb many of the new requirements within existing programs.

There are benefits to the Vote Center Model that should not be overlooked. One of these is the reduction in risk that is currently experienced each time a statewide election is conducted under a Polling Place Model. This risk continues to grow as state lawmakers pass policies that create heavier administrative burdens for election officials to enact in a Polling Place Model.

Moreover, the County has procured a new voting system which has the capacity and capabilities to meet the demands of the Vote Center Model. Robust technologies exist to better manage to the new policies the state has passed. Existing and new security measures can be easily employed to match the standards needed to safeguard every ballot and election under the Vote Center Model. Cost is anticipated to run higher during the initial roll-out; however, with federal and state funding and legislative amendments, the County can bridge most of the budget gaps.

Finally, the County is in a favorable position to learn and better understand the outcome from the 15 counties who will have the Vote Center Model in place for the 2020 elections. The County is equipped to adjust and implement accordingly, should a transition be approved, based on these “lessons learned”.

That said, the County must consider the challenges associated with this Vote Center Model. Attracting qualified and available individuals to work at each vote center for several weeks, the onboarding and administration of these individuals, the siting and availability of qualified locations, the implementation of an extensive voter education & outreach plan, the need for legislative changes and the shift in voter behavior must all be factored in when making a decision of this magnitude. With this Study, a prudent and thoughtful approach has been taken to consider such an endeavor.

Appendix A: Vote Center Model (Elections Code 4005)

4005.

(a) Notwithstanding Section 4000 or any other law, on or after January 1, 2018, the Counties of Calaveras, Inyo, Madera, Napa, Nevada, Orange, Sacramento, San Luis Obispo, San Mateo, Santa Clara, Shasta, Sierra, Sutter, and Tuolumne, and, except as provided in Section 4007, on or after January 1, 2020, any county may conduct any election as an all-mailed ballot election if all of the following apply:

(1) (A) At least two ballot dropoff locations are provided within the jurisdiction where the election is held or the number of ballot dropoff locations are fixed in a manner so that there is at least one ballot dropoff location provided for every 15,000 registered voters within the jurisdiction where the election is held, as determined on the 88th day before the day of the election, whichever results in more ballot dropoff locations. For purposes of this subparagraph, a vote center that includes an exterior ballot drop box counts only as a single ballot dropoff location. Ballot dropoff locations shall comply with the regulations adopted pursuant to subdivision (b) of Section 3025.

(B) A ballot dropoff location provided for under this section consists of a secure, accessible, and locked ballot box located as near as possible to established public transportation routes and that is able to receive voted ballots. All ballot dropoff locations shall be open at least during regular business hours beginning not less than 28 days before the day of the election, and on the day of the election. At least one ballot dropoff location shall be an accessible, secured, exterior drop box that is available for a minimum of 12 hours per day including regular business hours.

(2) (A) The county elections official permits a voter residing in the county to do any of the following at a vote center:

(i) Return, or vote and return, his or her vote by mail ballot.

(ii) Register to vote, update his or her voter registration, and vote pursuant to Section 2170.

(iii) Receive and vote a provisional ballot pursuant to Section 3016 or Article 5 (commencing with Section 14310) of Chapter 3 of Division 14.

(iv) Receive a replacement ballot upon verification that a ballot for the same election has not been received from the voter by the county elections official. If the county elections official is unable to determine if a ballot for the same election has been received from the voter, the county elections official may issue a provisional ballot.

(v) Vote a regular, provisional, or replacement ballot using accessible voting equipment that provides for a private and independent voting experience.

(B) Each vote center shall have at least three voting machines that are accessible to voters with disabilities.

(3) (A) On the day of the election, from 7 a.m. to 8 p.m., inclusive, and on each of the three days before the election, for a minimum of eight hours per day, at least one vote center is provided for every 10,000 registered voters within the jurisdiction where the election is held, as determined on the 88th day before the day of the election. At least 90 percent of the number of vote centers required by this subparagraph shall be open for all four days during the required times. Up to 10 percent of the number of vote centers required by this subparagraph may be open for less than four days if at least one vote center is provided for every 10,000 registered voters on each day.

(B) Notwithstanding subparagraph (A), for a jurisdiction with fewer than 20,000 registered voters, a minimum of two voter centers are provided on the day of the election and on each of the three days before the election within the jurisdiction where the election is held.

(4) (A) Beginning 10 days before the day of the election and continuing daily up to and including the fourth day before the election, for a minimum of eight hours per day, at least one vote center is provided for every 50,000 registered voters within the jurisdiction where the election is held, as determined on the 88th day before the day of the election.

(B) Notwithstanding subparagraph (A), for a jurisdiction with fewer than 50,000 registered voters, a minimum of two vote centers are provided within the jurisdiction where the election is held.

(C) The vote centers provided under this section are established in accordance with the accessibility requirements described in Article 5 (commencing with Section 12280) of Chapter 3 of Division 12, the federal Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 12101 et seq.), the federal Help America Vote Act of 2002 (52 U.S.C. Sec. 20901 et seq.), and the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.).

(D) The vote centers provided under this section are equitably distributed across the county so as to afford maximally convenient options for voters and are established at accessible locations as near as possible to established public transportation routes. The vote centers shall be equipped with voting units or systems that are accessible to individuals with disabilities and that provide the same opportunity for access and participation as is provided to voters who are not disabled, including the ability to vote privately and independently in accordance with Sections 12280 and 19240.

(E) (i) The vote centers provided under this section have an electronic mechanism for the county elections official to immediately access, at a minimum, all of the following voter registration data:

(I) Name.

(II) Address.

(III) Date of birth.

(IV) Language preference.

(V) Party preference.

(VI) Precinct.

(VII) Whether or not the voter has been issued a vote by mail ballot and whether or not a ballot has been received by the county elections official.

(ii) The electronic mechanism used to access voter registration data shall not be connected in any way to a voting system.

(5) A method is available for voters with disabilities to request and receive a blank vote by mail ballot and, if a replacement ballot is necessary, a blank replacement ballot that voters with disabilities can read and mark privately and independently pursuant to the federal Help America Vote Act of 2002 (52 U.S.C. Sec. 20901 et seq.).

(6) (A) Except as otherwise provided for in this section, election boards for the vote centers established under this section meet the requirements for eligibility and composition pursuant to Article 1 (commencing with Section 12300) of Chapter 4 of Division 12.

(B) Each vote center provides language assistance in all languages required in the jurisdiction under subdivision (c) of Section 12303 or Section 203 of the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.) in a manner that enables voters of the applicable language minority groups to participate effectively in the electoral process. Each vote center shall post information regarding the availability of language assistance in English and all other languages for which language assistance is required to be provided in the jurisdiction under subdivision (c) of Section 12303 or Section 203 of the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.).

(i) If a vote center is located in, or adjacent to, a precinct, census tract, or other defined geographical subsection required to establish language requirements under subdivision (c) of Section 12303 or Section 203 of the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.), or if it is identified as needing language assistance through the public input process described in clause (ii), the county elections official shall ensure that the vote center is staffed by election board members who speak the required language. If the county elections official is unable to recruit election board members who speak the required language, alternative methods of effective language assistance shall be provided by the county elections official.

(ii) The county elections official shall solicit public input regarding which vote centers should be staffed by election board members who are fluent in a language in addition to English pursuant to subdivision (c) of Section 12303 and Section 203 of the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.).

(iii) The county elections official shall provide notice in the sample ballot, in vote by mail materials, and on his or her Internet Web site of the specific language services available at each vote center.

(C) Each vote center provides election materials translated in all languages required in the jurisdiction under subdivision (a) of Section 14201 and Section 203 of the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.).

(D) Each vote center provides reasonable modifications and auxiliary aids and services as required by the federal Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 12101 et seq.) and the federal Rehabilitation Act of 1973 (29 U.S.C. Sec. 701 et seq.).

(7) (A) Beginning 10 days before the election, the county elections official maintains, in an electronic format, an index of voters who have done any of the following at one of the voter centers established pursuant to this section:

(i) Registered to vote or updated his or her voter registration.

(ii) Received and voted a provisional ballot or replacement ballot.

(iii) Voted a ballot using equipment at the vote center.

(B) The index required by subparagraph (A) includes the same information for each voter as is required to be included on copies of the index of affidavits of voter registration that are posted pursuant to Section 14294. The index required by subparagraph (A) shall be updated continuously during any time that a vote center is open in the jurisdiction.

(8) (A) Beginning 29 days before the day of the election, the county elections official mails to each registered voter a vote by mail ballot packet that includes a return envelope with instructions for the use and return of the vote by mail ballot.

(B) The county elections official delivers to each voter, with either the sample ballot sent pursuant to Section 13303 or with the vote by mail ballot packet, all of the following:

(i) A notice, translated in all languages required under subdivision (a) of Section 14201 and Section 203 of the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.), that informs voters of all of the following:

(I) An all-mailed ballot election is being conducted and each eligible voter will be issued a vote by mail ballot by mail.

(II) The voter may cast a vote by mail ballot in person at a vote center during the times and days specified in subparagraph (A) of paragraph (4) or on election day.

(III) No later than seven days before the day of the election, the voter may request the county elections official to send a vote by mail ballot in a language other than English pursuant to Section 203 of the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.) or a facsimile copy of the ballot printed in a language other than English pursuant to Section 14201.

(IV) No later than seven days before the day of the election, the voter may request the county elections official to send or deliver a ballot that voters with disabilities can read and mark privately and independently pursuant to the federal Help America Vote Act of 2002 (52 U.S.C. Sec. 20901 et seq.).

(ii) A list of the ballot dropoff locations and vote centers established pursuant to this section, including the dates and hours they are open. The list shall also be posted on the Internet Web site of the county elections official in a format that is accessible for people with disabilities pursuant to Section 11135 of the Government Code.

(iii) A postage-paid postcard that the voter may return to the county elections official for the purpose of requesting a vote by mail ballot in a language other than English or for the purpose of requesting a vote by mail ballot in an accessible format.

(C) Upon request, the county elections official provides written voting materials to voters with disabilities in an accessible format, as required by the federal Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 12101 et seq.) and the federal Rehabilitation Act of 1973 (29 U.S.C. Sec. 701 et seq.).

(9) (A) The county elections official establishes a language accessibility advisory committee that is comprised of representatives of language minority communities. The committee shall be established no later than October 1 of the year before the first election conducted pursuant to this section. The committee shall hold its first meeting no later than April 1 of the year in which the first election is conducted pursuant to this section.

(B) The county elections official establishes a voting accessibility advisory committee that is comprised of voters with disabilities. The committee shall be established no later than October 1 of the year before the first election conducted pursuant to this section. The committee shall hold its first meeting no later than April 1 of the year in which the first election is conducted pursuant to this section.

(C) A county with fewer than 50,000 registered voters may establish a joint advisory committee for language minority communities and voters with disabilities.

(10) (A) The county elections official develops a draft plan for the administration of elections conducted pursuant to this section in consultation with the public, including both of the following:

(i) One meeting, publicly noticed at least 10 days in advance of the meeting, that includes representatives, advocates, and other stakeholders representing each community for which the county is required to provide voting materials and assistance in a language other than English under subdivision (a) of Section 14201 and the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.).

(ii) One meeting, publicly noticed at least 10 days in advance of the meeting, that includes representatives from the disability community and community organizations and individuals that advocate on behalf of, or provide services to, individuals with disabilities.

(B) The county elections official, when developing the draft plan for the administration of elections conducted pursuant to this section, considers, at a minimum, all of the following:

(i) Vote center and ballot dropoff location proximity to public transportation.

(ii) Vote center and ballot dropoff location proximity to communities with historically low vote by mail usage.

(iii) Vote center and ballot dropoff location proximity to population centers.

(iv) Vote center and ballot dropoff location proximity to language minority communities.

(v) Vote center and ballot dropoff location proximity to voters with disabilities.

- (vi) Vote center and ballot dropoff location proximity to communities with low rates of household vehicle ownership.
 - (vii) Vote center and ballot dropoff location proximity to low-income communities.
 - (viii) Vote center and ballot dropoff location proximity to communities of eligible voters who are not registered to vote and may need access to same day voter registration.
 - (ix) Vote center and ballot dropoff location proximity to geographically isolated populations, including Native American reservations.
 - (x) Access to accessible and free parking at vote centers and ballot dropoff locations.
 - (xi) The distance and time a voter must travel by car or public transportation to a vote center and ballot dropoff location.
 - (xii) The need for alternate methods for voters with disabilities for whom vote by mail ballots are not accessible to cast a ballot.
 - (xiii) Traffic patterns near vote centers and ballot dropoff locations.
 - (xiv) The need for mobile vote centers in addition to the number of vote centers established pursuant to this section.
- (C) The county elections official publicly notices the draft plan for the administration of elections conducted pursuant to this section and accepts public comments on the draft plan for at least 14 days before the hearing held pursuant to subparagraph (D).
- (D) (i) Following the 14-day review period required by subparagraph (C), the county elections official holds a public meeting to consider the draft plan for the administration of elections conducted pursuant to this section and to accept public comments. The meeting shall be publicly noticed at least 10 days in advance of the meeting on the Internet Web sites of the clerk of the county board of supervisors and the county elections official, or, if neither the clerk of the county board of supervisors nor the county elections official maintain an Internet Web site, in the office of the county elections official.
- (ii) After the public hearing to consider the draft plan for the administration of elections conducted pursuant to this section and to accept public comments, the county elections official shall consider any public comments he or she receives from the public and shall amend the draft plan in response to the public comments to the extent he or she deems appropriate. The county elections official shall publicly notice the amended draft plan and shall accept public comments on the amended draft plan for at least 14 days before the county elections official may adopt the amended draft plan pursuant to subparagraph (E).
- (E) (i) Following the 14-day review and comment period required by clause (ii) of subparagraph (D), the county elections official may adopt a final plan for the administration of elections conducted pursuant to this section, and shall submit the voter education and outreach plan that is required by clause (i) of subparagraph (I) to the Secretary of State for approval.
- (ii) The Secretary of State shall approve, approve with modifications, or reject a voter education and outreach plan submitted pursuant to clause (i) of subparagraph (I) within 14 days after the plan is submitted by the county elections official.
- (iii) The draft plan, the amended draft plan, and the adopted final plan for the administration of elections conducted pursuant to this section shall be posted on the Internet Web site of the county elections official in each language in which the county is required to provide voting materials and assistance under subdivision (a) of Section 14201 and the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.), and the Secretary of State's Internet Web site in a format that is accessible for people with disabilities pursuant to Section 11135 of the Government Code.
- (F) Public meetings held pursuant to this paragraph shall, upon request, provide auxiliary aids and services to ensure effective communication with people with disabilities.
- (G) Within two years of the adoption of the first plan for the administration of elections conducted pursuant to this section, the county elections official shall hold public meetings in accordance with the procedures described in subparagraphs (C) to (F), inclusive, to consider revising the first plan for the administration of elections conducted pursuant to this section. Every four years thereafter, the county elections official shall hold public meetings in accordance with the procedures described in subparagraphs (C) to (F), inclusive, to consider revising the plan for the administration of elections conducted pursuant to this section.
- (H) (i) With reasonable public notification, a county elections official may amend a plan for the administration of elections conducted pursuant to this section no more than 120 days before the date of an election held pursuant to this section.
- (ii) With reasonable public notification, a county elections official may amend a plan for the administration of elections conducted pursuant to this section more than 120 days before the date of an election held pursuant to this section if he or she provides at least 30 days to accept public comments on the amended plan.
- (I) The plan for the administration of elections conducted pursuant to this section, includes all of the following:

(i) A voter education and outreach plan that is approved by the Secretary of State and that includes all of the following:

(I) A description of how the county elections official will use the media, including social media, newspapers, radio, and television that serve language minority communities for purposes of informing voters of the upcoming election and promoting the toll-free voter assistance hotline.

(II) A description of how the county elections official will use the media, including social media, newspapers, radio, and television for purposes of informing voters of the availability of a vote by mail ballot in an accessible format and the process for requesting such a ballot.

(III) A description of how the county elections official will have a community presence to educate voters regarding the provisions of this section.

(IV) A description of the accessible information that will be publicly available on the accessible Internet Web site of the county elections official.

(V) A description of the method used by the county elections official to identify language minority voters.

(VI) A description of how the county elections official will educate and communicate the provisions of this section to the public, including:

(ia) Communities for which the county is required to provide voting materials and assistance in a language other than English under subdivision (a) of Section 14201 and the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.). The county elections official shall hold at least one bilingual voter education workshop for each language in which the county is required to provide voting materials and assistance in a language other than English under subdivision (a) of Section 14201 and the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.).

(ib) The disability community, including organizations and individuals that advocate on behalf of, or provide services to, individuals with disabilities. The county elections official shall hold at least one voter education workshop to increase accessibility and participation of eligible voters with disabilities.

(VII) A description of how the county will spend the necessary resources on voter education and outreach to ensure that voters are fully informed about the election. This description shall include information about the amount of money the county plans to spend on voter education and outreach activities under the plan, and how that compares to the amount of money spent on voter education and outreach in recent similar elections in the same jurisdiction that were not conducted pursuant to this section.

(VIII) At least one public service announcement in the media, including newspapers, radio, and television, that serve English-speaking citizens for purposes of informing voters of the upcoming election and promoting the toll-free voter assistance hotline. Outreach made under this subclause shall include access for voters who are deaf or hard of hearing and voters who are blind or visually impaired.

(IX) At least one public service announcement in the media, including newspapers, radio, and television, that serve non-English-speaking citizens for each language in which the county is required to provide voting materials and assistance under subdivision (a) of Section 14201 and the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.) for purposes of informing voters of the upcoming election and promoting the toll-free voter assistance hotline.

(X) At least two direct contacts with voters for purposes of informing voters of the upcoming election and promoting the toll-free voter assistance hotline. The two direct contacts are in addition to any other required contacts including, but not limited to, sample ballots and the delivery of vote by mail ballots.

(ii) A description of how a voter with disabilities may request and receive a blank vote by mail ballot and, if a replacement ballot is necessary, a blank replacement ballot that a voter with disabilities can mark privately and independently.

(iii) A description of how the county elections official will address significant disparities in voter accessibility and participation identified in the report required by subdivision (g).

(iv) A description of the methods and standards that the county elections official will use to ensure the security of voting conducted at vote centers.

(v) Information about estimated short-term and long-term costs and savings from conducting elections pursuant to this section as compared to recent similar elections in the same jurisdiction that were not conducted pursuant to this section.

(vi) To the extent available at the time of publication, information on all of the following:

(I) The total number of vote centers to be established.

(II) The total number of ballot dropoff locations to be established.

(III) The location of each vote center.

- (IV) The location of each ballot dropoff location and whether it is inside or outside.
- (V) A map of the locations of each vote center and ballot dropoff location.
- (VI) The hours of operation for each vote center.
- (VII) The hours of operation for each ballot dropoff location.
- (VIII) The security and contingency plans that would be implemented by the county elections official to do both of the following:
- (ia) Prevent a disruption of the vote center process.
- (ib) Ensure that the election is properly conducted if a disruption occurs.
- (IX) The number of election board members and the number of bilingual election board members and the languages spoken.
- (X) The services provided to voters with disabilities, including, but not limited to, the type and number of accessible voting machines and reasonable modifications at each vote center.
- (XI) The design, layout, and placement of equipment inside each voter center that protects each voter's right to cast a private and independent ballot.
- (vii) A toll-free voter assistance hotline that is accessible to voters who are deaf or hard of hearing, and that is maintained by the county elections official that is operational no later than 29 days before the day of the election until 5 p.m. on the day after the election. The toll-free voter assistance hotline shall provide assistance to voters in all languages in which the county is required to provide voting materials and assistance under subdivision (a) of Section 14201 and the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.).
- (J) The plan for the administration of elections conducted pursuant to this section is posted in a format that is accessible to persons with disabilities on the Internet Web site of the Secretary of State and on the Internet Web site of the county elections official.
- (b) Notwithstanding Section 4000 or any other law, on or after January 1, 2018, the Counties of Calaveras, Inyo, Madera, Napa, Nevada, Orange, Sacramento, San Luis Obispo, San Mateo, Santa Clara, Shasta, Sierra, Sutter, and Tuolumne, and on or after January 1, 2020, any county may conduct a special election as an all-mailed ballot election under this section if all of the following apply:
- (1) The county elections official has done either of the following:
- (A) Previously conducted an election as an all-mailed ballot election in accordance with subdivision (a).
- (B) Adopted a final plan for the administration of elections pursuant to clause (i) of subparagraph (E) of paragraph (9) of subdivision (a), in which case the county elections official shall complete all activities provided for in the voter education and outreach plan that is required by clause (i) of subparagraph (I) of paragraph (9) of subdivision (a) before the day of the special election.
- (2) (A) On the day of election, from 7 a.m. to 8 p.m., inclusive, at least one vote center is provided for every 30,000 registered voters. If the jurisdiction is not wholly contained within the county, the county elections official shall make a reasonable effort to establish a vote center within the jurisdiction where the special election is held.
- (B) Notwithstanding subparagraph (A), for a jurisdiction with fewer than 30,000 registered voters, the county elections official makes a reasonable effort to establish a vote center.
- (3) (A) Not less than 10 days before the day of the election, for a minimum of eight hours per day, at least one vote center is provided for every 60,000 registered voters. If the jurisdiction is not wholly contained within the county, the county elections official shall make a reasonable effort to establish a vote center within the jurisdiction where the special election is held.
- (B) Notwithstanding subparagraph (A), for a jurisdiction with fewer than 30,000 registered voters, the county elections official makes a reasonable effort to establish a vote center.
- (4) (A) At least one ballot dropoff location is provided for every 15,000 registered voters. At least one ballot dropoff location shall be located within the jurisdiction where the special election is held. All ballot dropoff locations shall be open at least during regular business hours beginning not less than 28 days before the day of the election, and on the day of the election.
- (B) Notwithstanding subparagraph (A), for a jurisdiction with fewer than 15,000 registered voters, at least one ballot dropoff location shall be provided.
- (c) Except as otherwise provided in this section, the election day procedures shall be conducted in accordance with Division 14 (commencing with Section 14000).
- (d) The county elections official may provide, at his or her discretion, additional ballot dropoff locations and vote centers for purposes of this section.

(e) The return of voted vote by mail ballots is subject to Sections 3017 and 3020.

(f) For the sole purpose of reporting the results of an election conducted pursuant to this section, upon completion of the ballot count, the county elections official shall divide the jurisdiction into precincts pursuant to Article 2 (commencing with Section 12220) of Chapter 3 of Division 12 and shall prepare a statement of the results of the election in accordance with Sections 15373 and 15374.

(g) (1) (A) Within six months of each election conducted pursuant to this section or Section 4007, the Secretary of State shall report to the Legislature, to the extent possible, all of the following information by categories of race, ethnicity, language preference, age, gender, disability, permanent vote by mail status, historical polling place voters, political party affiliation, and language minorities as it relates to the languages required under subdivision (a) of Section 14201 and Section 203 of the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.):

(i) Voter turnout.

(ii) Voter registration.

(iii) Ballot rejection rates.

(iv) Reasons for ballot rejection.

(v) Provisional ballot use.

(vi) Accessible vote by mail ballot use.

(vii) The number of votes cast at each vote center.

(viii) The number of ballots returned at ballot dropoff locations.

(ix) The number of ballots returned by mail.

(x) The number of persons who registered to vote at a vote center.

(xi) Instances of voter fraud.

(xii) Any other problems that became known to the county elections official or the Secretary of State during the election or canvass.

(B) The report required by subparagraph (A) shall be posted on the Internet Web site of the Secretary of State in a format that is accessible for people with disabilities pursuant to Section 11135 of the Government Code.

(C) The report required by subparagraph (A) shall be submitted to the Legislature in compliance with Section 9795 of the Government Code.

(D) If an election is conducted pursuant to this section, the county shall submit, to the extent possible, to the Secretary of State the information needed for the Secretary of State to prepare the report required by subparagraph (A).

(E) The Secretary of State may contract with any qualified person or organization for purposes of preparing the report required by subparagraph (A).

(2) The county elections official shall post on his or her Internet Web site a report that compares the cost of elections conducted pursuant to this section to the costs of previous elections. The report shall be posted in a format that is accessible for people with disabilities pursuant to Section 11135 of the Government Code.

(h) The Secretary of State shall enforce the provisions of this section pursuant to Section 12172.5 of the Government Code.

(i) For purposes of this section, "disability" has the same meaning as defined in subdivisions (j), (m), and (n) of Section 12926 of the Government Code.

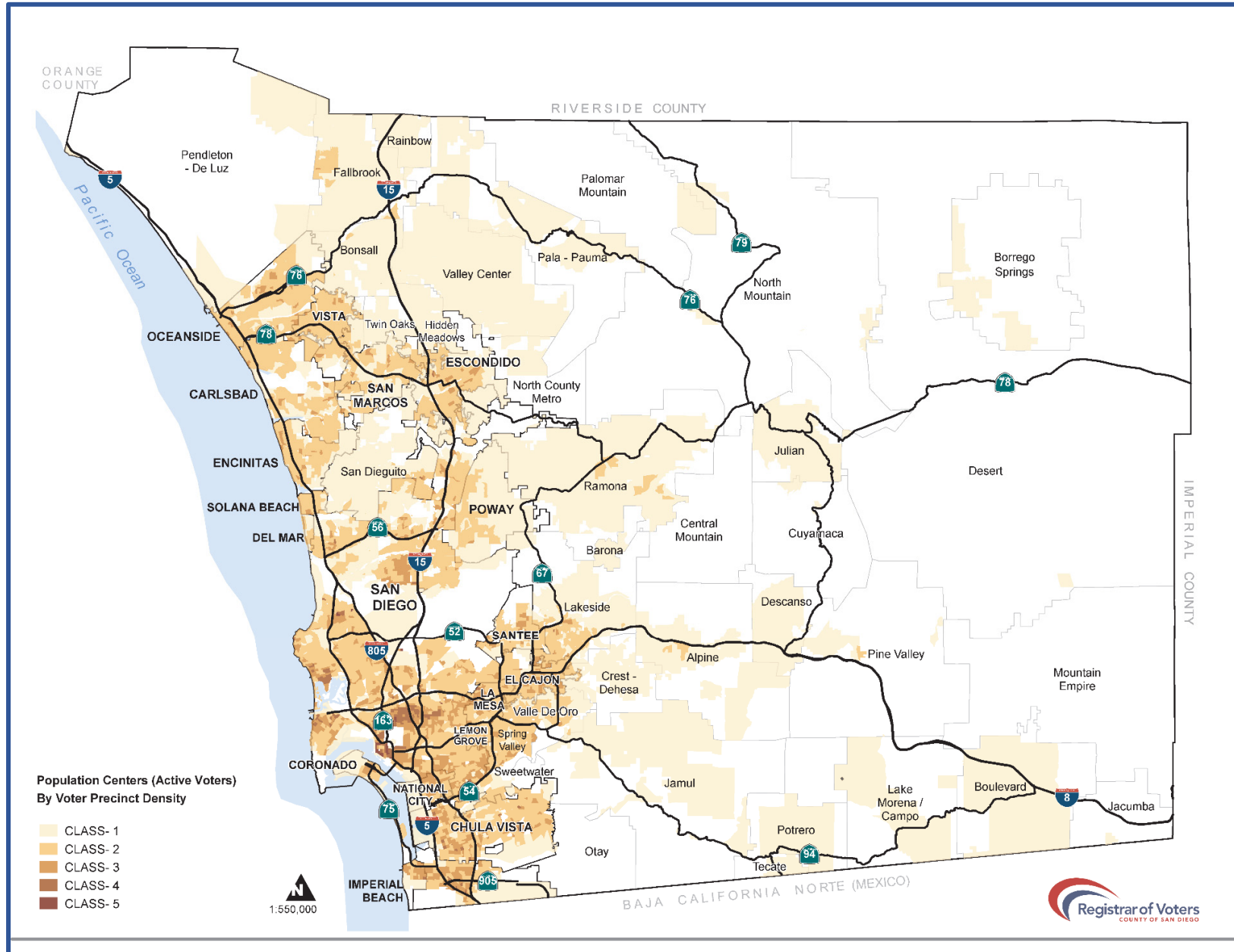
(Amended by Stats. 2017, Ch. 845, Sec. 4. (AB 918) Effective January 1, 2018.)

Appendix B: Mail Ballot Statistics by Jurisdiction

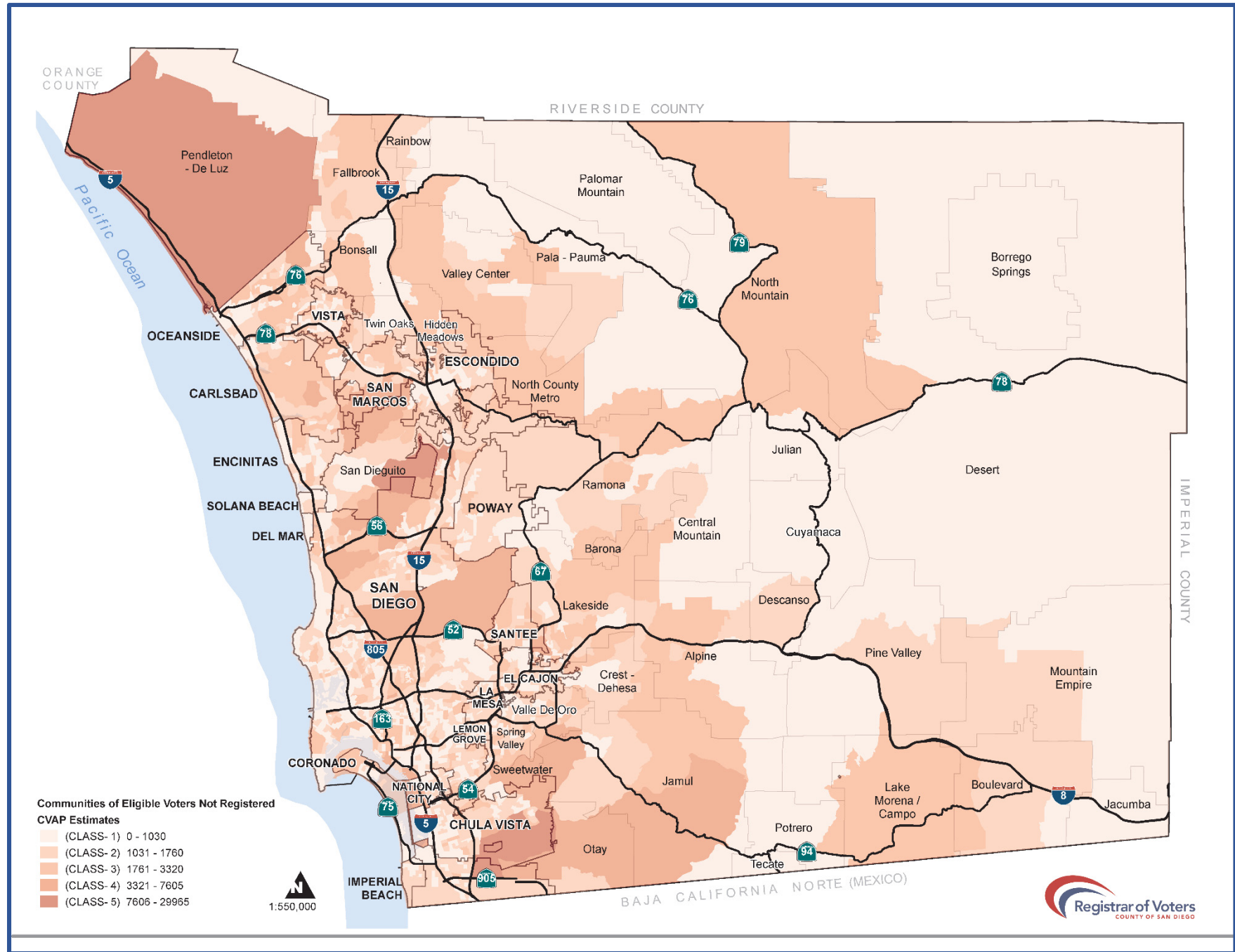
BOARD OF SUPERVISORS	Registered Voters	Registered Voters Perm	Difference	Nov 2016 Declared	Nov 2016 Declared Perm	Nov 2016 Declared Non-Perm	Nov 2016 Decl. Unin.	Nov 2016 Decl. Unin. Perm	Nov 2016 Decl. Unin. Non-Perm	Nov 2016 Decl. Cities	Nov 2016 Decl. Cities Perm	Nov 2016 Decl. Cities Non-Perm
2011 1ST SUPERVISORIAL DIST	319,916	223,632	96,284	5,184	3,900	1,284	710	529	181	4,474	3,371	1,103
2011 2ND SUPERVISORIAL DIST	374,892	265,413	109,479	15,741	11,788	3,953	12,619	9,539	3,080	3,122	2,249	873
2011 3RD SUPERVISORIAL DIST	364,580	269,598	94,982	11,914	9,180	2,734	2,141	1,676	465	9,773	7,504	2,269
2011 4TH SUPERVISORIAL DIST	377,409	263,615	113,794	2,427	1,713	714	-	-	-	2,427	1,713	714
2011 5TH SUPERVISORIAL DIST	351,245	262,851	88,394	25,454	19,750	5,704	19,869	15,426	4,443	5,585	4,324	1,261
Grand Total	1,788,042	1,285,109	502,933	60,720	46,331	14,389	35,339	27,170	8,169	25,381	19,161	6,220
STATE ASSEMBLY	Registered Voters	Registered Voters Perm	Difference	Nov 2016 Declared	Nov 2016 Declared Perm	Nov 2016 Declared Non-Perm	Nov 2016 Decl. Unin.	Nov 2016 Decl. Unin. Perm	Nov 2016 Decl. Unin. Non-Perm	Nov 2016 Decl. Cities	Nov 2016 Decl. Cities Perm	Nov 2016 Decl. Cities Non-Perm
2011 71ST ASSEMBLY DIST	244,082	173,273	70,809	14,679	11,055	3,624	12,720	9,637	3,083	1,959	1,418	541
2011 75TH ASSEMBLY DIST	194,194	143,741	50,453	21,075	16,340	4,735	15,725	12,255	3,470	5,350	4,085	1,265
2011 76TH ASSEMBLY DIST	263,554	196,408	67,146	9,509	7,202	2,307	3,833	2,874	959	5,676	4,328	1,348
2011 77TH ASSEMBLY DIST	294,586	216,686	77,900	6,303	4,982	1,321	2,035	1,655	380	4,268	3,327	941
2011 78TH ASSEMBLY DIST	290,923	208,928	81,995	1,803	1,366	437	-	-	-	1,803	1,366	437
2011 79TH ASSEMBLY DIST	272,276	190,323	81,953	5,402	4,008	1,394	1,017	742	275	4,385	3,266	1,119
2011 80TH ASSEMBLY DIST	228,427	155,750	72,677	1,949	1,378	571	9	7	2	1,940	1,371	569
Grand Total	1,788,042	1,285,109	502,933	60,720	46,331	14,389	35,339	27,170	8,169	25,381	19,161	6,220
STATE SENATE	Registered Voters	Registered Voters Perm	Difference	Nov 2016 Declared	Nov 2016 Declared Perm	Nov 2016 Declared Non-Perm	Nov 2016 Decl. Unin.	Nov 2016 Decl. Unin. Perm	Nov 2016 Decl. Unin. Non-Perm	Nov 2016 Decl. Cities	Nov 2016 Decl. Cities Perm	Nov 2016 Decl. Cities Non-Perm
2011 36TH SENATORIAL DIST	269,249	200,673	68,576	10,901	8,315	2,586	5,225	3,987	1,238	5,676	4,328	1,348
2011 38TH SENATORIAL DIST	544,823	395,398	149,425	34,528	26,490	8,038	25,689	19,828	5,861	8,839	6,662	2,177
2011 39TH SENATORIAL DIST	579,741	416,476	163,265	7,134	5,445	1,689	484	388	96	6,650	5,057	1,593
2011 40TH SENATORIAL DIST	394,229	272,562	121,667	8,157	6,081	2,076	3,941	2,967	974	4,216	3,114	1,102
Grand Total	1,788,042	1,285,109	502,933	60,720	46,331	14,389	35,339	27,170	8,169	25,381	19,161	6,220
CONGRESSIONAL	Registered Voters	Registered Voters Perm	Difference	Nov 2016 Declared	Nov 2016 Declared Perm	Nov 2016 Declared Non-Perm	Nov 2016 Decl. Unin.	Nov 2016 Decl. Unin. Perm	Nov 2016 Decl. Unin. Non-Perm	Nov 2016 Decl. Cities	Nov 2016 Decl. Cities Perm	Nov 2016 Decl. Cities Non-Perm
2011 49TH CONGRESSIONAL DIST	310,213	232,444	77,769	14,191	10,953	3,238	8,260	6,436	1,824	5,931	4,517	1,414
2011 50TH CONGRESSIONAL DIST	356,509	258,743	97,766	29,568	22,607	6,961	22,589	17,342	5,247	6,979	5,265	1,714
2011 51ST CONGRESSIONAL DIST	253,226	171,087	82,139	5,080	3,691	1,389	2,513	1,922	591	2,567	1,769	798
2011 52ND CONGRESSIONAL DIST	436,019	317,381	118,638	5,634	4,401	1,233	160	132	28	5,474	4,269	1,205
2011 53RD CONGRESSIONAL DIST	432,075	305,454	126,621	6,247	4,679	1,568	1,817	1,338	479	4,430	3,341	1,089
Grand Total	1,788,042	1,285,109	502,933	60,720	46,331	14,389	35,339	27,170	8,169	25,381	19,161	6,220

Appendix C: Satellite Location Siting Analysis

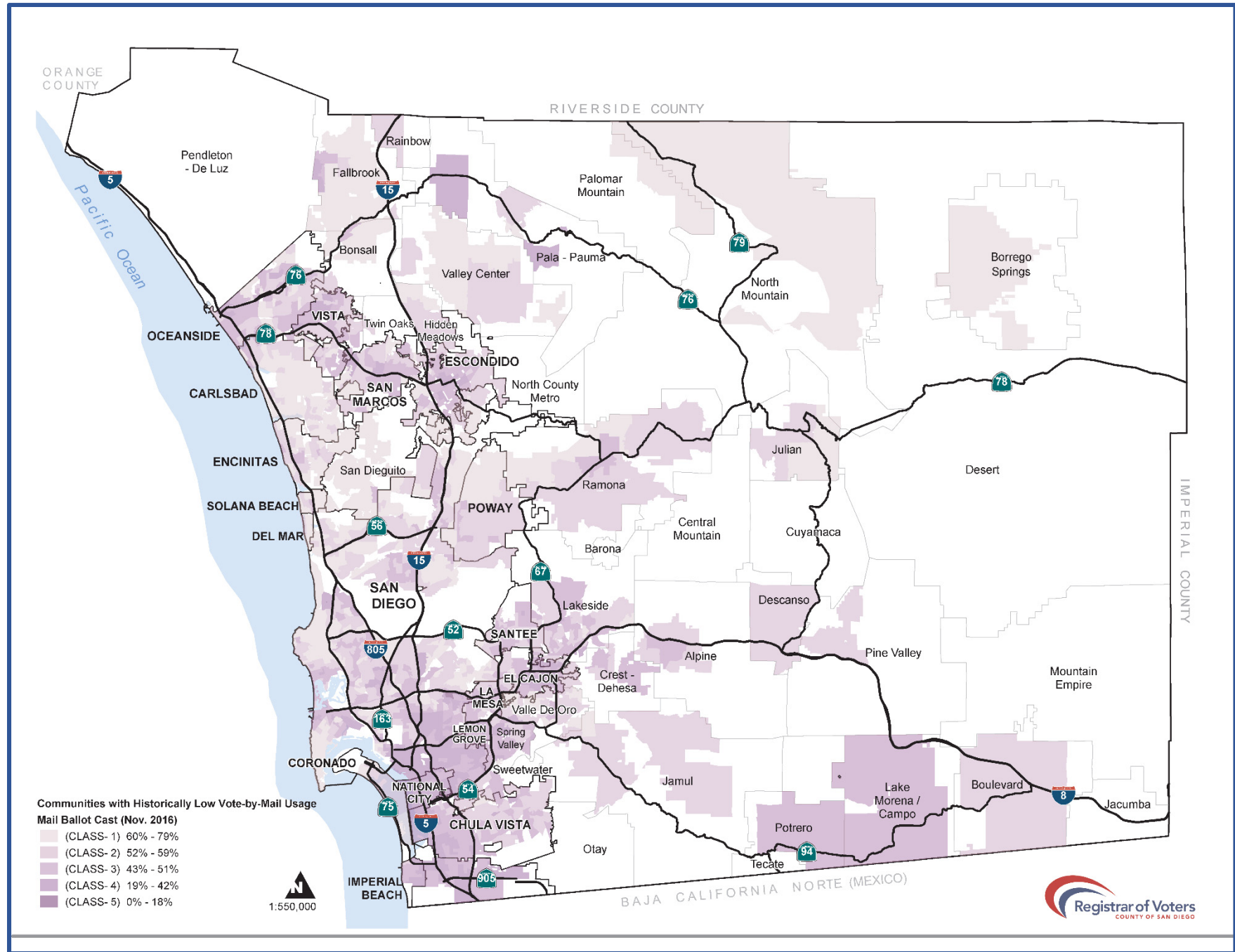
POPULATION CENTERS (ACTIVE VOTERS)



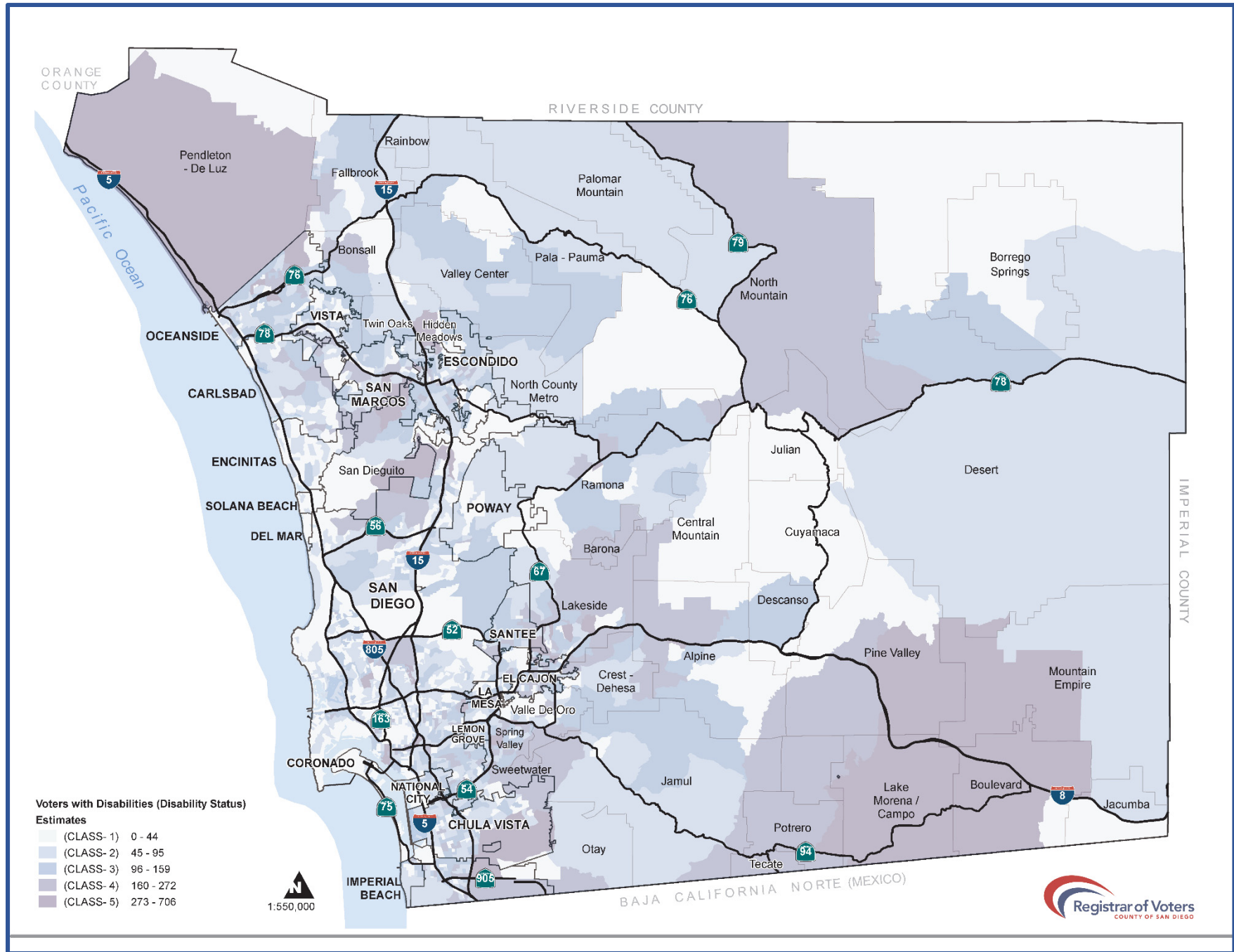
COMMUNITIES OF ELIGIBLE VOTERS NOT REGISTERED (CVAP ESTIMATES)



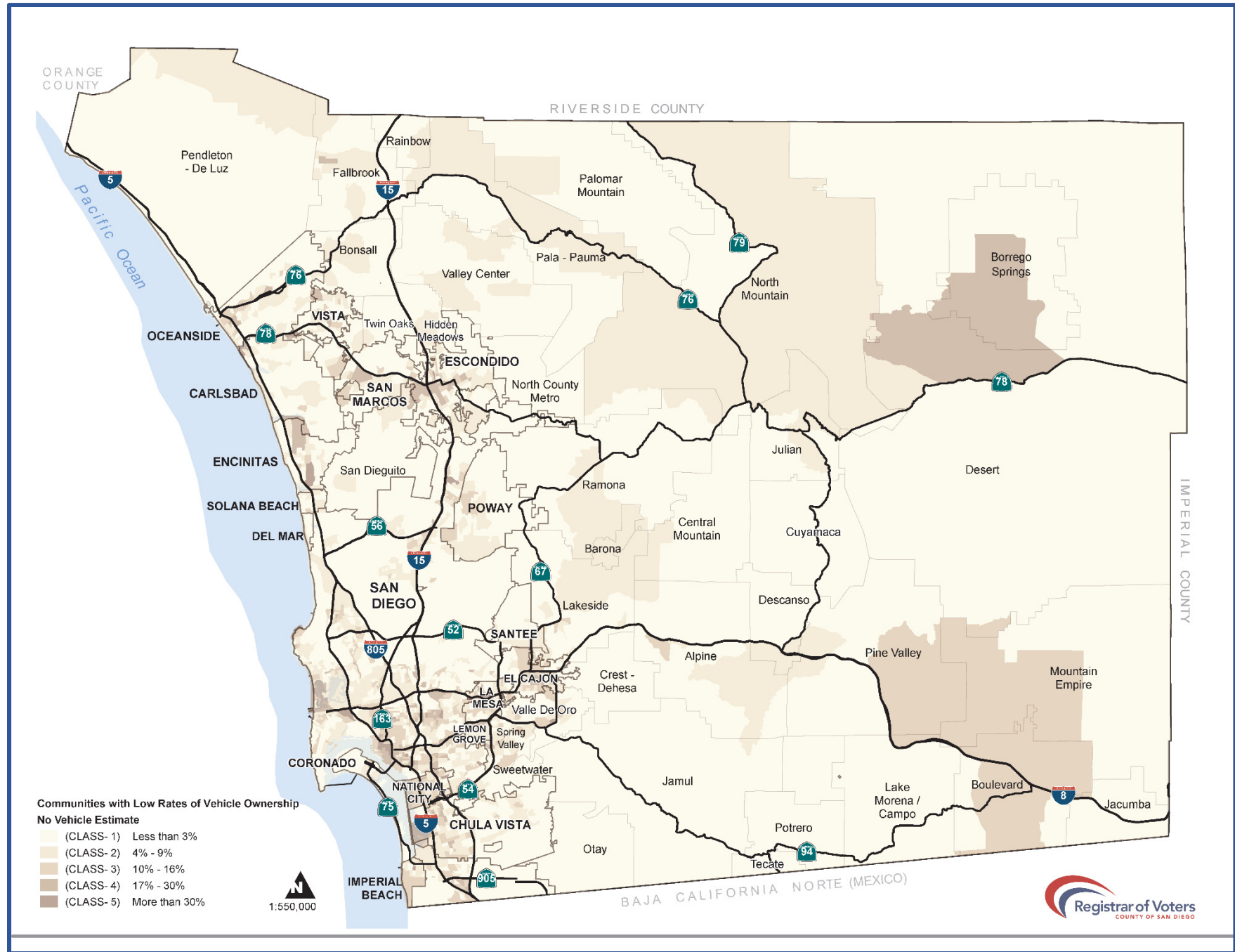
COMMUNITIES WITH HISTORICALLY LOW VOTE-BY-MAIL USAGE



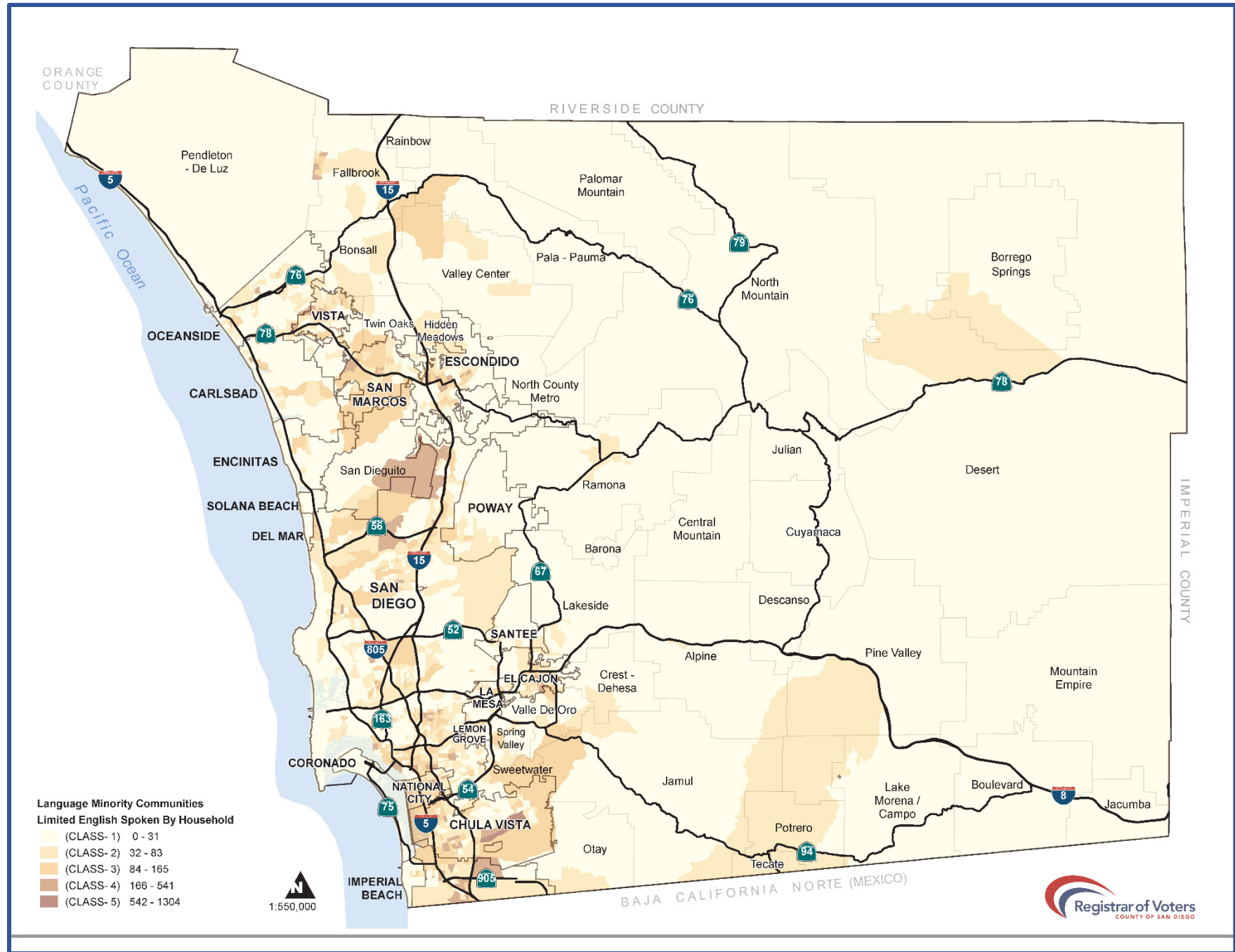
VOTERS WITH DISABILITIES (DISABILITY STATUS)



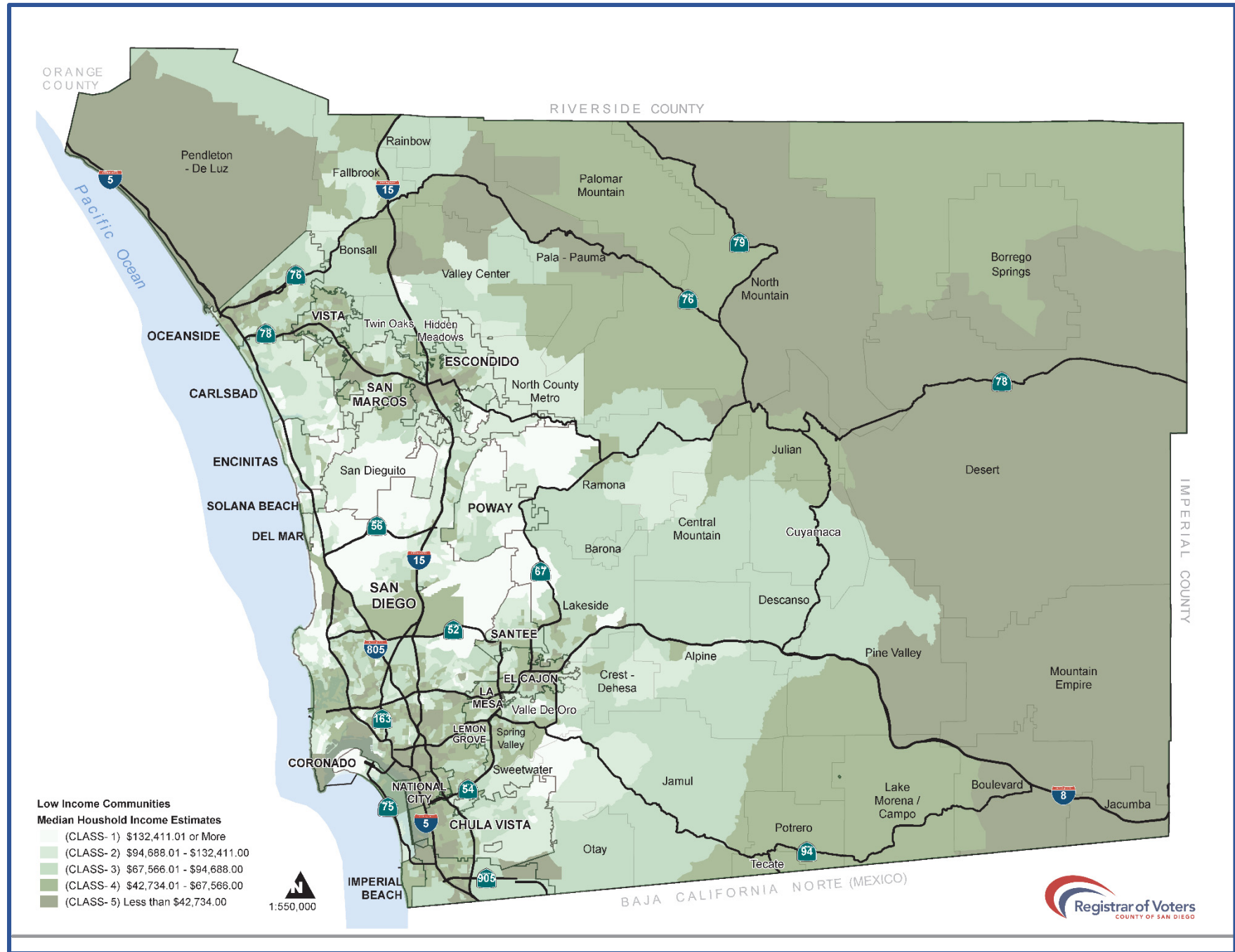
COMMUNITIES WITH LOW RATES OF VEHICLE OWNERSHIP



LANGUAGE MINORITY COMMUNITIES – LIMITED ENGLISH SPOKEN HOUSEHOLD



LOW INCOME COMMUNITIES MEDIAN HOUSEHOLD INCOME



Appendix D: Satellite Location Layout

SATELLITE LOCATION DIAGRAM (MOCK-UP)

