



COLORADO COUNTY CLERKS ASSOCIATION

Election Technical Committee

July 30, 2019

Hon. Jena Griswold
Colorado Secretary of State
1700 Broadway, Suite 200
Denver, CO 80290

Secretary Griswold:

Thank you very much for the opportunity to comment on the proposed election rules dated June 28, 2019. The CCCA Election Technical Committee (formerly known as ESRC) has the following comments:

Rule 7.9.11

If polling is extended in one part of the state but not another, the unaffected counties would like to publish local election results instead of holding off. Smaller counties especially believe that this will lead to backlash against them from their communities. One possible solution is to permit unaffected counties to post results themselves.

Rule 11.3.2(a)

Some counties like to conduct their Logic and Accuracy Tests with ballots from their print vendor's production run instead of Dominion's test deck. This rule, as proposed, would force these counties to use Dominion's test deck because the print vendors cannot meet the 29-day deadline. Therefore, counties oppose this change and would like to be given more time to conduct the LAT.

Additionally, the counties noted that they do not need to complete the LAT to pull the zero file.

Rule 11.9.1(d)

This proposed naming convention is not possible because it does not align with the exports from SCORE and Dominion. The Dominion export does not include precinct splits and it does not show up in the ENR report. One county tested this naming convention in SCORE and SCORE will not allow for more than 10 digits. Counties would like for the naming convention to match their styles in SCORE.



COLORADO COUNTY CLERKS ASSOCIATION

Election Technical Committee

Rule 17.1.2

The committee would like to see an amendment to this rule regarding issuing a mail ballot or replacement ballot in the event of loss of SCORE connectivity. The procedure to phone or emails the office is not the only approach to issuing the ballot and create unnecessary delays. There are other contingencies including address locators, contingency poll books, etc., to enable a review of eligibility. In addition, the ballot received cannot be checked in or processed until SCORE service is restored when eligibility can be verified. This procedure would reflect the legislative discussion and intent of the statutory amendment in HB 19-1278. Voters can be processed more efficiently in the event of a technical outage, particularly if the outage is widespread without unnecessarily prompting the provisional process. You can secure these ballots separately until the event is resolved. The committee recommends the following amendment:

~~17.1.2 If a voter service and polling center loses connectivity to SCORE, the judges must issue provisional ballots until the county restores the connectivity unless the election officials are able to contact the elections office to issue vote credit in SCORE immediately~~ AN ELECTION JUDGE MUST ATTEMPT TO VERIFY THE ELECTOR'S ELIGIBILITY TO DETERMINE THE ADDRESS AND BALLOT STYLE. THE MAIL BALLOTS ISSUED DURING THE LOSS OF CONNECTIVITY WILL BE BATCHED SEPARATELY UNTIL CONNECTIVITY IS RESTORED AND CAN BE CHECKED INTO SCORE. IF THE APPROPRIATE ADDRESS AND BALLOT STYLE CANNOT BE DETERMINED, THE ELECTION JUDGE MUST ISSUE THE VOTER A PROVISIONAL BALLOT.

Rule 20.3.1

Boulder County has used an electronic chain-of-custody system since 2016 and would like to continue to do so. The County would like to ensure that the final form of this rule does not preclude them from continuing to use its system.

Thank you,

Dan Volkosh and Todd Davidson
Co-chairs, Election Technical Committee