

Rule Change	Comment
7.7.8 (b)(1)(2) Signature Verification Judge audit	<p>On the day before and on election day, the volume of ballot returns surges. This makes it practically unmanageable to keep pace with processing tens of thousands of ballots, conduct audits promptly and thoroughly. While the audit rule of reviewing 3% or at least 5 decisions per team each day is well intentioned for the oversight and accuracy, it becomes extremely difficult to enforce effectively under high-pressure conditions. If we conduct this audit throughout the election we would have addressed any errors or discrepancies with our judges prior to the last two days of the election. We would suggest on election day we audit less. Or, preferably, we save the last two days of auditing until after the election. Should we add an exception to auditing on the weekend or on a holiday?</p>
7.7.15	<p>This is an unfunded mandate which puts the burden on the county. Since the state has the information we suggest this become a state function. The other option is to add a second signature line on the registration form to save money and eliminate the need to chase down additional signatures.</p>
7.8.5	<p>Title One already outlines required services at the VSPC. Sometimes only provisional or statewide ballots are available and if there are equipment issues, judges may need to suggest immediate available options while resolving problems. The rule may be redundant or too rigid given operational realities.</p>
7.8.12 (c)	<p>Currently this is not technology the county has , nor do we have the funding to cover this cost. Will the state provide this technology and any costs associated with this this rule? How often is the hotline utilized in an election? While this may be a great service, would it be used and funded by the state? Most of our VSPC's are tight with equipment and have limited space so a private area to have a call like this is not always possible.</p>

7.9.4	<p>Is this intended to be a newly funded position by the Secretary of State? In our county, we already have a staff member responsible for conducting ADA surveys, ensuring each site is properly set up in compliance with the federal and state accessibility requirements. Additionally, the SOS conducts random audits to verify compliance. This proposed rule appears to overreach by implying that the SOS or the designated accessibility coordinator has direct oversight of the county clerk. In most cases, the clerk does not personally conduct these surveys, a designated staff member does. Therefore, it is unclear and problematic why the rule is worded to place full responsibility on the clerk or this new "coordinator." The state already provides the ADA requirements and checklist for compliance. It is not appropriate to shift responsibility for these established duties to a newly designated coordinator within each county. This is an unnecessary and unacceptable overreach into county operations.</p>
16.1.3(c)	<p>And provision should be removed. If we are able to email, we should not be required to additionally mail correspondence. Is this going to be a report that we are able to pull out of SCORE to identify covered voters that meet these criteria?</p>
16.1.6	<p>Must email and mail, same position as above. If we can email we should not be required to also mail? This is an outdated rule. Why are we required to take these extra steps to covered voters? Concerned about PMIV that are unable to receive mail where they are stationed and that is one of the reasons why they are set up for email delivery. Who will pay the cost for the mailing and email and staff time for a redundant process?</p>

19.4.4	<p>While an annual in-person training is a great idea in theory, it is not feasible for many counties due to budget constraints. Not all counties can afford the travel costs associated with sending staff to other locations. Unless training is provided within each county, this approach may not be realistic, especially for those with limited staff and tight budget. This puts a hardship on counties and is an unfunded mandate. Offering the training every two years helps offset costs and allows counties to stagger staff attendance more effectively. Additionally, in a presidential election year, scheduling such a training would be particularly challenging due to the workload involved in managing three separate elections.</p>
20.4.4(b)	<p>Why would this be a requirement? Who would pay for this? County employees have badges that contain their room access embedded in the badge itself.</p>
20.4.5(b)	<p>Who will pay for the individual or entity to conduct this security assessment?</p>
20.5.1(a)	<p>We have to remove a seal on our server each time we install updated virus protection. Can this be revised to state it is fine for an update or do we need to get permission each time? What are you trying to prevent? This will be a burden on the county to have to wait for a response before we can do the updated virus protection.</p>
21.1.1(5)	<p>Shouldn't the county notify the SOS? I would not want to rely on a voting system provider to notify the SOS.</p>