

From: [Steve Schleiker](#)
To: [SoS Rulemaking](#)
Cc: [Kristi Ridlen](#); [Angela Leath](#); [Michelle Stroup](#); [karlnordstrom](#); [Steve Schleiker](#)
Subject: [EXTERNAL] Proposed Secretary of State Rule Amendments for Operational Feasibility, Accessibility, and Voter-Centric Administration
Date: Tuesday, September 16, 2025 11:46:39 AM
Attachments: [image001.png](#)
[Proposed Rule Changes.pdf](#)

Dear Rules Hearing Board Members,

Thank you for your continued partnership and for the opportunity to offer constructive recommendations to strengthen Colorado's election rules. I also want to expressly thank Judd and Andrew for their thoughtful comments on our submissions; their feedback materially improved clarity, feasibility, and consistency with NVRA/HAVA and current operational realities.

Over the past several days, my team and I met repeatedly and reviewed each rule line-by-line with a fine-tooth comb. The below draft and attached PDF incorporate suggestions that were made either in-person or online during today's Rules Hearing. We are hopeful the below suggestions resolve ambiguities my team and I identified in day-to-day practice, and propose low-cost, auditable paths to implementation.

Below are a summary of the proposed changes and the specific outcomes we hope to seek:

1. New Rule 7.7.15 – Reference Signatures (Ages 17-25)

- Issue: Age-based mass outreach duplicates processes, adds costs, and risks message fatigue.
- Proposal: Replace age-based outreach with criteria-based outreach for any elector lacking two high-quality reference signatures; publish uniform intake/security standards; confirm reimbursement or centralized outreach points.
- Outcome: Accurate signature databases, targeted cost, equitable treatment.

2. Amendments to Rule 7.8.5 – Offering Voting Options at VSPCs

- Issue: Lengthy scripts slow operations and confuse voters.
- Proposal: Satisfy "offer" via conspicuous multilingual signage plus a brief neutral script; clarify SCORE contingencies when voiding mail ballots during outages; standardize void reason codes and audit trail elements.
- Outcome: Clear voter choice, faster lines, strong auditability.

3. Amendments to Rule 7.8.12 – Video Relay Access at VSPCs

- Issue: No minimum technical specifications; privacy/funding unclear.

Proposal: Set device/network minimums; require privacy placement and non-recording assurances; provide judge job aids and outage fallbacks; confirm reimbursement or state-issued kits.

- Outcome: Consistent, private language access without unfunded mandates.

4. New Rule 7.9.4 – County Accessibility Coordinator

- Issue: Duplication with existing ADA roles; per-election designation is burdensome; funding unclear.
- Proposal: Allow annual designation; allow designation of County ADA Office; provide model templates/training; confirm reimbursement; offer alternative-compliance path for extraordinary circumstances.
- Outcome: Accountability without redundant paperwork or unfunded costs.

5. Amendments to Rule 16.1.3 – Removal of UOCAVA Status

- Issue: Triggers are hard to verify; dual email/postal notices may not reach overseas voters.
- Proposal: Base removals on elector attestation or verifiable system updates; send notices via elector's preferred channel (email permitted); provide uniform scripts/forms and audit requirements.
- Outcome: Accurate rolls while protecting military/overseas voters.

6. Amendments to Rule 16.1.6 – 60-Day Outreach to Covered Voters

- Issue: Dual-channel (email + postal) mandate adds cost/noise where email is preferred and reliable.
- Proposal: Use elector's preferred method (email-only where chose, or mail if no/failed email); allow one annual notice before the first election unless content changes; confirm reimbursement.
- Outcome: Timely, voter-preferred outreach with lower costs and higher effectiveness.

7. New Rule 16.1.7 – Undeliverable Covered-Voter Correspondence

- Returned postal mail could trigger inactivation despite successful email.
- Proposal: Treat undeliverable events as channel-specific; do not inactivate solely for postal returns if email contact succeeds; permit electronic confirmation; define "undeliverable"; provide simple reinstatement path.
- Outcome: Protects service members while maintaining integrity.

8. Amendments to Rule 19.3.4 – In-Person Training Cadence

- Issue: Annual In-Person requirement strains staffing/budgets and collides with

election timelines.

- Proposal: Retain biennial in-person or allow high quality synchronous virtual equivalency; publish statewide calendar with regional sessions; set blackout windows; confirm travel/backfill reimbursement.
- Outcome: Strong standards feasible for all counties.

9. Amendments to Rule 20.4.4 – Physical Access, Identification, Key Cards

- Issue: Banning integrated photo-ID/access badges conflicts with secure systems and adds cost.
- Proposal: Allow integrated badges with layered controls; define visible badge elements (first name, role, county seal); emphasize logs/cameras/rapid deactivation; clarify display requirements.
- Outcome: Higher security and lower costs with uniform public-facing identification.

10. Amendments to Rule 20.4.5 – Physical Security Assessments

- Issue: Cadence/timing may disrupt operation; funding and confidentiality unclear.
- Proposal: Establish blackout windows around statewide elections; confirm reimbursement for assessments and priority remediation; require assessor independence/qualifications; treat reports as security-sensitive records (two-part deliverable); recognize recent equivalent DHS/CISA/county assessments.

11. Amendments to Rule 20.5.1 – Access to Sealed Voting System Hardware

- Issue: Operational delays if approval isn't timely during live operations.
- Proposal: Maintain written-permission requirement; add 24/7 on-call approval channel with defined response times during critical periods; codify reseal/photo/logging protocols and record-retention.
- Outcome: Uniform, auditable controls with real-world responsiveness.

12. Amendments to Rule 21.1.1 – Voting System Peripherals

- Issue: Treating commodity HIDs (monitors/keyboards/mice) like security-relevant peripherals causes delays and cost.
- Proposal: Limit notification/approval to security/data-path peripherals; allow immediate "break/fix" for commodity HIDs meeting SOS specifications with after-the-fact notice and minimal documentation.
- Outcome: Preserves security while enabling timely, cost-effective operations.

El Paso County remains committed to equitable access, fiscal stewardship, and transparent, auditable elections. These amendments will help counties meet the spirit and letter of Colorado law while serving voters efficiently and respectfully.

Respectfully, Steve



[Book time with Steve Schleiker](#)

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MEMORANDUM

From: Steve Schleiker, El Paso County Clerk & Recorder *SMS*
To: Kristi Ridlen, El Paso County Deputy Clerk and Recorder
Angie Leath, El Paso County Clerk and Recorder Elections Manager
Date: Tuesday, September 16, 2025
Subj: Proposed Amendment to Rule 7.7.15

Thank you, Chair and members of the Rules Hearing Board, for the opportunity to testify to Proposed Rule 7.7.15—the annual outreach to collect reference signatures from electors aged 17 to 25.

First, I want to emphasize full support for the underlying goal: strengthening our voter signature reference database is key to reducing cure rates and ensuring ballots are counted without unnecessary delays. Robust reference signatures improve verification accuracy and reinforce trust in our elections.

However, as currently drafted, Rule 7.7.15 creates considerable challenges—operationally, financially, and in terms of public perception. The requirement for blanket annual outreach to every 17–25-year-old voter, regardless of existing references, comes at a steep cost. For El Paso County alone, this means mailing up to 76,555 electors yearly, with estimated costs between \$49,000 and \$84,000, not including necessary staffing, management of digital outreach, or additional data security measures. This work coincides with our busiest pre-election months and duplicates efforts already authorized under Rule 7.7.14, which targets any elector with fewer than two references, regardless of age.

Duplication isn't the only concern. The rule, as written, may subject young electors to repeated mailings even if they already have sufficient references, while overlooking older voters who also lack adequate signatures. This age-based approach risks negative perceptions of fairness and impartiality in our process. It also creates the potential for message fatigue among engaged young voters, possibly reducing the effectiveness of all outreaches.

Further, counties vary widely in digital communication capabilities and data quality. Standing up new systems for secure email or SMS outreach—while safeguarding personally identifiable information, complying with consent requirements, and maintaining public records—requires clear technical

standards and significant resources. The proposed rule is silent on who bears these costs, risking the creation of an unfunded mandate for counties.

We propose adopting a criteria-based approach: Only those electors—of any age—who lack two high-quality reference signatures should be contacted. Outreach and intake standards should be uniform and centrally published by the Department of State. Counties already working at capacity would benefit from a centralized, state-run outreach option and clear confirmation that all associated costs are eligible for reimbursement.

In summary, the intent of Rule 7.7.15 is crucial, but its implementation needs adjustments to prevent costly duplication, protect equity and public trust, and ensure operational feasibility. A targeted, criteria-based campaign, with clear intake, security, and reimbursement standards, will help us reach the State's goals while supporting county resources and voter confidence.

Thank you for your attention.

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MEMORANDUM

From: Steve Schleiker, El Paso County Clerk & Recorder *SMS*

To: Kristi Ridlen, El Paso County Deputy Clerk and Recorder
Angie Leath, El Paso County Clerk and Recorder Elections Manager

Date: Tuesday, September 16, 2025

Subj: **Proposed Amendment to Rule 7.8.12(c)**

Thank you, Chair and members of the Rules Hearing Board, for the opportunity to testify on the proposed amendments to Rule 7.8.12(c), relating to video relay access at Voter Service and Polling Centers.

El Paso County strongly supports the fundamental goal of expanding access to interpreter services, including American Sign Language and multilingual video relay, for all voters at every VSPC. Reliable language access ensures full participation in our elections and upholds our commitment to equity and inclusion. For these requirements to succeed, however, counties need clear technical standards, practical privacy safeguards, and explicit support for funding and implementation.

Currently, the proposed rule does not specify minimum device capabilities or how video relay access should be set up. Without clear specifications, counties risk purchasing equipment that may not function reliably or consistently across sites. We recommend that the Secretary of State publish clear device guidelines: each site should have a two-way video-capable device, such as a tablet, laptop, or smartphone, with a stable internet connection and hands-free mounting. The system should allow for both headset use, with disposable covers for sanitation, and directional speakers to maximize both privacy and accessibility. Placement of these devices must guarantee voter privacy so that no ballots or voting surfaces are seen by the interpreter, and no audio or video is recorded locally on the device.

In addition to technical standards, there must be straightforward procedures and fallback plans on the interest of voter service. Judges should be given simple, uniform training on how to activate and use the hotline, ensure privacy, sanitize equipment, and what to do in the event of a service outage—including reverting to audio-only interpretation as needed. Signage in plain English and Spanish should communicate to voters that interpreter services are available and that no calls are recorded, ensuring that all voters are aware without fear of surveillance or confusion.

Financially, counties face real costs for hardware, stands, headsets, hotspots, privacy panels, cleaning supplies, and staff training. To avoid an unfunded mandate, we respectfully request the state either centrally procure standard kits for counties or confirm that all such election accessibility costs are reimbursable. This will ensure all counties, regardless of budget, can fully comply with both the spirit and the letter of this rule.

This proposed rule will also impact VSPCs located on private property, which may represent additional challenges if property owners do not agree with the installation or operation of required video relay equipment and procedures.

Finally, it is critical that neither hardware constraints nor workflow delays impeded access for Limited English Proficient or ASL-using voters. Simple procedures for managing demand, like numbered queues and temporary audio access, will help maintain fairness and prevent disparate delays.

In summary, with clear device minimums, explicit privacy protections, practical workflow support, and confirmed funding, Rule 7.8.12(c) will allow Colorado's counties to provide consistent, private, and accessible interpreter services at all polling locations. We respectfully request these clarifications and support, so every voter receives equitable and dignified service, strengthening trust and participation across the state.

Thank you for your consideration.

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MEMORANDUM

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To: Kristi Ridlen, El Paso County Deputy Clerk and Recorder
Angie Leath, El Paso County Clerk and Recorder Elections Manager

Date: Tuesday, September 16, 2025

Subj: Proposed Amendment to Rule 7.8.15

Thank you, Chair and members of the Rules Hearing Board, for the opportunity to testify on the proposed changes to Rule 7.8.5 regarding the options offered at Voter Service and Polling Centers.

First, El Paso County fully supports the goal of ensuring that every voter is informed of all available voting options and that duplicate ballots are prevented. Presenting these choices clearly is essential for voter confidence and election integrity. However, we believe that the operational method for offering these options needs clarification and right-sizing to avoid unnecessary delays, confusion, and costs.

As written, the rule requires election judges to verbally provide all voters with detailed explanations of three options, using a ballot-marking devices, marking a hand-marked paper ballot, or receiving a mail ballot, even if many voters have already made their decision or simply intend to vote and deposit their ballot onsite. Requiring lengthy, repeated scripts at busy voting sites will slow down check-in and ballot issuance, drive up staffing and overtime needs, and ultimately result in longer lines, especially during peak periods. Instead, we urge that the “offer” requirement be satisfied through conspicuous multilingual signage at check-in and ballot issuance, paired with a one-line neutral script from judges confirming the voter’s choice. This approach both preserves voter autonomy and keeps operations moving efficiently.

Additionally, offering to issue a mail ballot to in-person voters, many of whom have shown up precisely because they want to mark and deposit a ballot onsite, can be confusing if handled verbally every time. This option should be made available by signage and upon voter request, rather than through a universal, mandatory offer.

There are practical contingencies to consider as well. The current draft requires voiding any outstanding mail ballot in SCORE before an in-person ballot is issued. While correct in principle, this

could halt all voting in the event SCORE outage or degraded internet service. The rule should specify a department-approved contingency, allowing elections to continue with proper post-restoration reconciliation.

For audit and compliance, the rule should define standard void reason codes and require the system to log which judge performed the void, when, and which ballot style was then issued. This ensures a robust transaction audit trail and supports transparency and consistency.

We also urge clear, objective triggers for the remedial program: counties need to know precisely when and under what conditions corrective action is required, along with a reasonable opportunity to address the issue outside of active voting windows unless necessary.

In summary, the intent behind Rule 7.8.5 is sound, but achieving its aims requires clear guidance: signage plus a brief, neutral script; robust accessible processes for all voters; and defined operational contingencies and remedial processes. These clarifications will help counties maintain efficient, accessible, and neutral polling sites without introducing unnecessary complexity or delay.

Thank you for considering these recommendations.

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MEMORANDUM

From: Steve Schleiker, El Paso County Clerk & Recorder *SMS*

To: Kristi Ridlen, El Paso County Deputy Clerk and Recorder
Angie Leath, El Paso County Clerk and Recorder Elections Manager

Date: Tuesday, September 16, 2025

Subj: Proposed Amendment to Rule 7.9.4

Thank you, Chair and members of the Rules Hearing Board, for the opportunity to testify to the proposed amendments to Rule 7.9.4, relating to County Accessibility Coordinator for Voting.

First, let me affirm that El Paso County strongly supports robust accessibility in elections. We already ensure ADA compliance at every Voter Service and Polling Center and ballot drop box, conduct annual accessibility surveys, and integrate accessibility into each election workstream with support from our County ADA Department. We share the Department's goal of making voting accessible to all.

That said, as currently drafted, Rule 7.9.4 presents challenges in three key areas: duplication, feasibility, and cost.

Duplication: The proposal risks overlapping with responsibilities that are already carried out by County ADA Officers, Facilities teams, and election administrators. Unless the scope is narrowly defined, counties may find themselves duplicating policies and paperwork that already exist.

Feasibility: Requiring a designation prior to each election creates unnecessary churn. An annual designation, with updates only if personnel change, would provide continuity while reducing administrative burden. This also helps smaller counties, where staffing is limited and "per-election" appointments may be practical.

Cost: The coordinator's duties, site audits, signage reviews, incident tracking, and remediation, will require dozens of staff hours, particularly in statewide elections. If new training or equipment is required, it must either be provided centrally by the Department of State or reimbursed. Without reimbursement, this effectively becomes an unfunded mandate.

I respectfully recommend that the Department adjust Rule 7.9.4 in five ways:

1. Allow annual, not per-election, designation of the coordinator.
2. Permit counties to designate their existing County ADA Officer or Department as the coordinator.
3. Provide state-issued model templates and training to avoid unnecessary duplication.
4. Confirm reimbursement for coordinator-related expenses.
5. Restore a narrow alternative-compliance pathway for extraordinary circumstances such as vacancies or emergency relocations.

With these refinements, the rule can achieve its intended goal: providing voters with a clear, accountable accessibility contact, without creating redundancy, imposing undue costs, or straining small-county operations.

In closing, I want to emphasize that counties are fully committed to accessibility. A clearly defined, well-supported coordinator role will strengthen what we already do, ensuring consistent service to voters while keeping the rule feasible statewide.

Thank you for your time and consideration.

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MEMORANDUM

From: Steve Schleiker, El Paso County Clerk & Recorder *SMS*

To: Kristi Ridlen, El Paso County Deputy Clerk and Recorder
Angie Leath, El Paso County Clerk and Recorder Elections Manager

Date: Tuesday, September 16, 2025

Subj: Proposed Amendment to Rule 16.1.3

Thank you, Chair and members of the Rules Hearing Board, for the opportunity to testify to the proposed amendments to Rule 16.1.3 concerning removal of covered-voter, or UOCAVA status.

El Paso County strongly supports accurate voter rolls and the timely delivery of ballots to our military and overseas citizens. These voters make extraordinary sacrifices, and they deserve both accuracy and reliability in how we administer their access to the ballot.

While the intent of this rule is sound, as currently drafted it presents challenges in three key areas: administration, communication, and fairness.

First, administration. The rule relies on triggers counties cannot reliably capture, such as whether a ballot was mailed versus dropped off, or whether an in-person vote occurred before or after leaving the state. Our election judges cannot realistically make these determinations at check-in and relying on post-election research risks inconsistency and errors. A more workable approach is to require objective, verifiable evidence, such as an elector's signed attestation at check-in or a documented change of residence in the statewide system.

Second, communication: The proposal requires both email and postal notice when removing UOCAVA status. Many overseas electors cannot receive postal mail. Forcing counties to send physical mailers that may never reach the voter creates extra cost without improving service. Notices should instead be sent through the elector's documented preferred channel, email where they have chosen it, so that communication is timely and effective.

Third, fairness: Erroneous removals of military and overseas voters would undermine confidence and could unintentionally disenfranchise those serving our country. To avoid this, removals must be based

on clear, elector-driven evidence, not assumptions. Counties also need standardized scripts and attestation forms, so the process is consistent statewide and transparent to voters.

In conclusion, I support the Department's goal of keeping UOCAVA status accurate and up to date. To achieve that, I respectfully recommend:

1. Limiting removals to cases with elector attestation or verifiable system updates.
2. Allowing notice through the elector's preferred communication method; including email-only where appropriate.
3. Providing uniform scripts, forms, and clear audit requirements.
4. Confirming that associated costs are reimbursable to counties.

With these refinements, Rule 16.1.3 will remain accurate, auditable, and voter-centric, protecting both election integrity and the rights of our military and overseas voters.

Thank you for your time and consideration.

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MEMORANDUM

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To: Kristi Ridlen, El Paso County Deputy Clerk and Recorder
Angie Leath, El Paso County Clerk and Recorder Elections Manager

Date: Tuesday, September 16, 2025

Subj: **Proposed Amendment to Rule 16.1.6**

Thank you, Chair and members of the Rules Hearing Board, for the opportunity to testify to the proposed amendments to Rule 16.1.6, regarding outreach to covered voters.

El Paso County fully supports proactive, reliable communication with our military and overseas voters. These men and women serve our nation under extraordinary circumstances, and they deserve timely information to ensure their ballots are received and counted. The intent of this rule required 60-day outreach, is sound. However, as drafted, the dual-channel mandate to send both email and postal mail creates operation, financial, and practical concerns.

First, operational impact. El Paso County currently has over 7,500 UOCAVA electors. Preparing both an email and a paper notice for every voter requires additional printing, assembly, and returned-mail handling during an already compressed election calendar. Many of these voters have explicitly chosen email as their reliable channel, and paper notices often return undeliverable from overseas addresses. This redundancy adds work without improving actual voter contact.

Second, cost. Duplicating notices could cost counties between \$5,000 and \$8,000 per year in postage and printing alone, not including staff time for preparation and handling returns. For voters who already rely successfully on email, this becomes an unfunded mandate with little value.

Third, voter preference and fairness. Covered voters already indicate their preferred method of communication when they register. Respecting that choice is critical to both efficiency and trust. A blanket requirement to send both email and mail risks confusion, unnecessary disclosure of personal data, and the perception that counties are ignoring voter preferences. Instead, counties should be allowed to use the elector's preferred delivery method, email if elected, or mail where no email exists or where email bounces.

In conclusion, I strongly support the goal of proactive communication. To make the rule workable and voter centric, I respectfully recommend three refinements.

- Allow outreach based on the elector's documented preference, using email-only where appropriate.
- Confirm that one annual notice before the first election of the year satisfies the requirement, unless material content changes.
- Provide state templates and clarify reimbursement for any costs related to print, postage, or training.

With these adjustments, Rule 16.1.6 can strengthen outreach to military and overseas voters without creating unnecessary costs or barriers. This approach ensures that communication is reliable, efficient, and respectful of the choices made by our covered voters.

Thank you for your time and consideration.

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MEMORANDUM

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To: Kristi Ridlen, El Paso County Deputy Clerk and Recorder
Angie Leath, El Paso County Clerk and Recorder Elections Manager

Date: Tuesday, September 16, 2025

Subj: **Proposed Amendment to Rule 16.1.7**

Thank you, Chair and members of the Rules Hearing Board, for the opportunity to testify to the proposed amendments to Rule 16.1.7, concerning the treatment of undeliverable covered-voter correspondence.

El Paso County supports accurate voter rolls and timely, reliable communication with our military and overseas voters. These electors face unique challenges in accessing the ballot, and our processes must protect both election integrity and their ability to participate. While the intent of this rule is sound, as drafted it would create significant risks of erroneous inactivation and operational burden.

First, the problem of channel failure. Many UOCAVA voters explicitly choose email because postal service is unreliable where they live or serve. If counties are required to mark these vote4rs inactive simply because a mailed piece is returned, we risk wrongly suppressing ballot delivery, even when email contact is successful. This would generate unnecessary complaints, cure efforts, and mistrust, especially among military voters.

Second, the operational and financial burden. El Paso County currently serves over 7,500 covered voters. We expect a meaningful share of postal returns on each cycle due to foreign mail routes. Treating these returns as grounds for inactivation would trigger thousands of status changes, confirmation mailings, and voter inquiries, during the busiest period of election preparation. This adds printing, postage, and staff time costs without improving voter contact.

Third, fairness and perception. Mass inactivation of military and overseas voters based on returned mail could be perceived as disenfranchising service members and their families. A voter-centric, preference-based process is more consistent with federal protections and public confidence.

For these reasons, I respectfully recommend three refinements to Rule 16.1.7:

1. Treat undeliverable events as channel-specific, if email succeeds, do not inactivate solely because postal mail fails.
2. Permit electronic confirmation methods where postal service is unreliable, and provide clear, standardized definitions for what constitutes “undeliverable”.
3. Ensure a rapid, simple reinstatement path for voters who reply electronically, with all related costs recognized as reimbursable.

In conclusion, El Paso County shares the Department’s commitment to accuracy and accountability. By adopting a preference-based, tiered approach, using email when possible, postal as fallback, we can maintain accurate lists, protect military and overseas voters from erroneous inactivation, and sustain voter confidence.

Thank you for your time and for considering these recommendations.

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To: Kristi Ridlen, El Paso County Deputy Clerk and Recorder
Angie Leath, El Paso County Clerk and Recorder Elections Manager

Date: Tuesday, September 16, 2025

Subj: **Proposed Amendment to Rule 19.3.4**

Thank you, Chair and members of the Rules Hearing Board, for the opportunity to testify to the proposed amendments to Rule 19.3.4, regarding continuing elections education and in-person training.

El Paso County strongly supports rigorous, consistent training for election officials. Maintaining a well-trained workforce is essential to voter confidence and the integrity of our elections. However, the proposed change, from requiring in-person training once every two years to at least once every year, creates significant operational and financial concerns if not paired with appropriate support.

First, the operational impact. In-person classes are currently offered infrequently and primarily along the Front Range. For counties across the state, especially rural jurisdictions, sending staff requires pulling them away from critical duties during peak election periods, arranging travel, and covering overtime. During presidential and statewide election cycles, this burden is compounded by the demands of UOCAVA transmission, ballot preparation, logic and accuracy testing, and canvass. An annual mandate without careful scheduling risks disrupting essential election operations.

Second, cost. Even at conservative in-state rates, a single trip for one staff member can cost between \$300 and \$900 when travel, lodging, and per diem are included, plus the indirect costs of reduced on-site capacity and overtime backfill. For large counties with multiple officials, this becomes a significant recurring expense. Without reimbursement, it amounts to an unfunded mandate.

Third, fairness and feasibility. An annual blanket requirement disproportionately burdens smaller and rural counties. It also raises questions of equity and perception if access to training appears easier for some jurisdictions than others. This also can be perceived as the Department generating additional income for their budget. To be workable, the rule must guarantee regional access, blackout windows

around live election periods, and the option of high-quality synchronous virtual training, no differently than some of the proposed VSPC rules introduced.

In conclusion, I support the goal of maintaining strong certification standards. To make this rule practical, I respectfully recommend:

- Retaining biennial in-person training or allowing synchronous virtual sessions as an equivalent.
- Publishing a statewide training calendar each January with quarterly regional sessions and guaranteed seat capacity.
- Establishing blackout windows to protect counties during critical election periods.
- Confirming state reimbursement for required travel, lodging, and backfill costs.

With these refinements, Rule 19.3.4 can continue to strengthen the competence and consistency of Colorado election officials without undermining election operations.

Thank you for your time and consideration.

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To: Kristi Ridlen, El Paso County Deputy Clerk and Recorder
Angie Leath, El Paso County Clerk and Recorder Elections Manager

Date: Tuesday, September 16, 2025

Subj: **Proposed Amendment to Rule 20.4.4**

Thank you, Chair and members of the Rules Hearing Board, for the opportunity to testify to the proposed amendments to Rule 20.4.4, regarding physical access, identification, and key card practices.

El Paso County fully supports secure, auditable control of election facilities and clear visual identification of election personnel. These measures are critical to maintaining both security and public trust. However, as drafted, subsection (c), which prohibits combining identification with access cards, creates conflicts with existing county security systems and may unintentionally reduce security while increasing costs.

First, on operational impact. Counties like mine already rely on integrated badge systems that combine photo identification with role-based access controls. These systems provide logged entry, layered protections such as cipher locks and alarm codes, and rapid deactivation for lost credentials. Requiring separate cards for identification and access would double issuance, increase replacements, and complicate end-of-cycle retrieval for hundreds of election judges and staff. Managing multiple credentials while handling ballots and equipment also increases the risk of drops, swaps, or tailgating at secure doors.

Second, on cost. For a general election, issuing both a printed ID and a separate access card can cost \$18 to \$30 per individual, plus ongoing replacements and administrative time. For a county like El Paso that onboards hundreds of judges, that translates into tens of thousands of dollars in added expenses, without meaningful improvement in security.

Third, on privacy and fairness. While voters and observers need to clearly recognize election personnel, badges should be standardized and neutral, showing first name, role, and county seal. This ensures transparency while protecting staff from unnecessary exposure to harassment. A rigid separation

requirement risks inconsistent practices and may even create perceptions of selective treatment across counties.

In conclusion, I fully support the goal of ensuring secure access and visible identification. To achieve that while maintaining practicality, I respectfully recommend that the rule:

1. Allow counties to use integrated photo ID and access cards where layered controls are in place.
2. Define minimum visible elements for badges, first name, role, and county seal, while protecting staff privacy.
3. Focus on critical safeguards such as access logs, camera coverage, and rapid deactivation of lost credentials.
4. Clarify contexts where IDs must be displayed, public-facing areas and ballot transport, not necessarily in restricted rooms with no observers.

By adopting these refinements, the rule will strengthen security and transparency without creating unnecessary costs or weakening county systems that already meet and exceed the intended standard.

Thank you for your time and consideration.

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MEMORANDUM

From: Steve Schleiker, El Paso County Clerk & Recorder *SMS*
To: Kristi Ridlen, El Paso County Deputy Clerk and Recorder
Angie Leath, El Paso County Clerk and Recorder Elections Manager
Date: Tuesday, September 16, 2025
Subj: **Proposed Amendment to Rule 20.4.5**

Thank you, Chair and members of the Rules Hearing Board, for the opportunity to testify to the proposed amendments to Rule 20.4.5, regarding physical security assessments.

El Paso County fully supports periodic, professional assessment of election facilities. Independent reviews can strengthen security and public confidence. However, as drafted, this rule raises several concerns in the areas of feasibility, cost, clarity, and confidentiality.

First, feasibility and timing: A three-year assessment cadence, plus mandatory reassessments within six months of a “significant alteration,” risks colliding with the busiest parts of the elections calendar, ballot build, UOCAVA transmission, logic and accuracy testing, and canvass. To keep operations running smoothly, counties need blackout windows that prevents assessments from being scheduled from 60 days before through 30 days after a statewide election.

Second, cost and funding. Security assessments are not inexpensive. If counties are required to hire Department-approved assessors, costs will include day rates, travel, and staff coordination time. More importantly, assessments inevitably generate recommendations, locks, cameras, cages, bollards, access control upgrades. Without a clear reimbursement pathway, these become unfunded mandates. Counties need confirmation that both assessments and priority remediation items will be eligible for state reimbursement.

Third, confidentiality and scope. Assessment reports will necessarily contain sensitive details, floor plans, camera coverage, alarm zones, transport routes. These must be treated as security-sensitive records under CORA, with clear redaction standards and limited distribution. I recommend a two-part deliverable: a confidential technical annex for election officials, and a non-sensitive executive summary suitable for public or board briefings.

Fourth, independence and standards. Assessors should meet published minimum qualifications and attest to independence, with no financial interest in selling products they recommend. The Department should also recognize recent DHS, CISA, or county risk management assessments that meet the state's template, so counties aren't forced to duplicate work unnecessarily.

In conclusion, I support the Department's commitment to stronger security. To make Rule 20.4.5 workable, I respectfully recommend:

1. Clear funding commitments for both assessments and remediation.
2. Published assessor qualifications and independence requirements.
3. Confidential handling of reports with two-part deliverables.
4. Blackout periods to protect election operations.
5. Flexibility to recognize equivalent recent assessments.

With these adjustments, Rule 20.4.5 will enhance security consistently across Colorado, without creating bottlenecks or imposing unfunded mandates on counties.

Thank you for your time and consideration.

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MEMORANDUM

From: Steve Schleiker, El Paso County Clerk & Recorder *SMS*

To: Kristi Ridlen, El Paso County Deputy Clerk and Recorder
Angie Leath, El Paso County Clerk and Recorder Elections Manager

Date: Tuesday, September 16, 2025

Subj: **Proposed Amendment to Rule 20.5.1**

Thank you, Chair and members of the Rules Hearing Board, for the opportunity to testify to the proposed amendments to Rule 20.5.1.

El Paso County supports this change, which clarifies that counties may not remove a seal to access a voting system compute case or hard-drive slot without prior written permission from the Secretary of State. This amendment aligns with our current practices and strengthens public trust by ensuring that any access to sealed equipment is a rare, auditable, and well-documented event.

First, on operational impact. The day-to-day effect of this rule will be minimal. We already maintain seals after trusted build and treat any internal access as an exceptional event under dual custody and strict logging. The one area that does require careful attention is response time during live election operations. If a hardware fault occurs at central count or during ballot processing, delays in obtaining permission could disrupt operations. I encourage the Department to provide a 24/7 on-call approval channel with defined response times, particularly during UOCAVA transmission, early voting, and Election Day.

Second, on recordkeeping. Counties are prepared to maintain full documentation for any authorized access, including photographs of the original seal, the break, and the reseal; serial numbers; dual observer signatures; timestamps, and the written permission itself. We ask the Department to confirm these artifacts are election records subject to standard retention and that the permission ticket or email satisfies audit needs without duplicative reporting.

Third, on fairness and perception. The value of this rule is that it is uniform, neutral, and easily explainable to observers: no county official, staff member, or vendor may open sealed election

equipment without written approval from the Secretary of State. This consistency will reduce speculation, reinforce security, and build public confidence.

In conclusion, El Paso County has no objection to the proposed language. We support it as a prudent safeguard that codifies the standards we already follow. With the addition of clear after-hours approval pathways, an emergency safety carve-out, and explicit reseal and verification protocols, counties can comply seamlessly while ensuring both security and continuity of election operations.

Thank you for your time and for considering these recommendations.

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MEMORANDUM

From: Steve Schleiker, El Paso County Clerk & Recorder *SMS*

To: Kristi Ridlen, El Paso County Deputy Clerk and Recorder
Angie Leath, El Paso County Clerk and Recorder Elections Manager

Date: Tuesday, September 16, 2025

Subj: **Proposed Amendment to Rule 21.1.1(c)(5)**

Thank you, Chair and members of the Rules Hearing Board, for the opportunity to testify to the proposed amendments to Rule 21.1.1(c)(5) concerning notification requirements for changes to voting system peripherals.

El Paso County fully supports strict configuration control for components that directly impact the security and integrity of our voting systems. At the same time, the rule should also reflect the practical realities of county procurement and operations.

First, on scope. We agree that notification and approval are appropriate when a provider changes security-relevant peripherals, such as card readers, certified scanners, or network routers and switches, because these devices interact with election data paths. However, we urge the Department not to require the same process for routine replacement of commodity human-interface devices like monitors, keyboards, or mice. These are common items counties already stock and replace, and they pose no security risk when they meet published minimum specifications.

Second, on operational continuity. If a monitor or keyboard fails during central count, staff must replace it immediately to stay on schedule with statutory deadlines. Requiring pre-clearance in these situations could delay critical election operations. A practical solution is to allow immediate “break/fix” replacement with functionally equivalent equipment, followed by notification within two business days. This ensures continuity while still maintaining transparency and accountability.

Third, on cost and efficiency. Counties already maintain inventories and asset logs with make, model, and serial numbers. Forcing every commodity replacement through a vendor channel would increase costs, add shipping delays, and create unnecessary paperwork without any improvement to security. A

risk-based approach, tight control of data-path components, streamlined handling of commodity HIDs, is both secure and efficient.

In conclusion, El Paso County supports the intent of Rule 21.1.1(c)(5): to keep the Secretary and providers informed when security-relevant peripherals change. To make this rule workable, I respectfully recommend:

1. Limit notification to peripherals that affect the security or data path of the voting system.
2. Allow counties to self-service replacements of commodity devices, provided they meet SOS-published specifications and the provider's compatibility list.
3. Add an emergency break/fix allowance with after-the-fact notification.
4. Define minimal documentation requirements so counties can comply without duplicative processes.

With these refinements, the rule will preserve security while ensuring practical, timely, and cost-effective election operations.

Thank you for your time and consideration.