



September 15, 2025

The Honorable Jena Griswold, Secretary of State
Department of State
1700 Broadway
Denver, CO 80290

Via email to: sos.rulemaking@sos.state.co.us

Re: Proposed Rules Regarding Elections

Dear Secretary Griswold,

Just Vote Colorado respectfully submits comment regarding the draft rules regarding elections proposed on August 15, 2025. We are a nonpartisan coalition of organizations that has focused on voter protection efforts in our state since 2004, governed by a diverse steering committee which currently includes representatives from Colorado Common Cause, the Colorado Lawyers Committee, Mi Familia Vota, Disability Law Colorado, and the League of Women Voters. Just Vote Colorado Election Protection is not affiliated with or promoting any issue or candidate.

Comments on proposed rules:

- ❖ Amendments to 20.4.4: We are supportive of broadening when visible identification is required to all election-related activities, to ensure voters, election watchers and volunteers can easily identify election staff and judges that are interfacing with the public.
- ❖ Amendments to Rule 19.3.4: We are supportive of requiring yearly in-person training for election officials.
- ❖ New Rule 7.9.4: We support the designation of an accessibility coordinator in each county.
 - Our assumption is that this person would coordinate with and/or report to the state accessibility coordinator. Given the purpose of this rule to ensure county clerk compliance with the law, how can coordinators seek help if a dispute emerges or a report must be made?



- We request additional clarity surrounding the assigned duty of “creating policies and materials to provide reasonable accommodation to voters as needed,” and believe it would benefit from additional language that ensures reasonable oversight and avoids disparate practices between counties, such as requiring that a log is maintained with any new policies or materials created in the course of the election, followed by a brief report/ submission of the log by the accessibility coordinator and the county clerk after the election. Preferably materials that are created in advance of an election must be approved by the State accessibility coordinator to ensure compliance?
- ❖ We are supportive of broadening when visible identification is required to all election-related activities, to ensure voters, election watchers and volunteers can easily identify election staff and judges that are interfacing with the public.
- ❖ Amendments to Rule 7.8.12: We are supportive of ensuring counties have a screen available to display video relay interpretation for the multilingual hotline, to give election judges more effective tools to assist voters who speak languages other than English, and to voters assist with adaptive technology to make the process of line-by-line translation easier. This technology can also assist Deaf and Hard of Hearing voters who speak languages other than English. We would encourage additional language in this rule to clarify:
 - Are live subtitles necessary for this to be operational for Deaf and HoH voters who do not speak English and are not ASL fluent?
 - Will the video option be available to all voters statewide, or only as a resource for in-person voting? We support adding optional video accessibility for all voters, and including information on how to access it via the existing public notices, ballot language and other outreach regarding the multi-lingual hotline.
- ❖ New Rule 7.7.15: We support the DOS and county clerks conducting an annual outreach campaign to reach young voters aged 17 to 25 to collect signatures; to encourage responses and preempt confusion among first-time voters, we support standardized language for the notice that includes young voter-specific information.

For example: “**Wondering why you are receiving this?** In Colorado, the signature on a voter's ballot is evaluated by a bipartisan team of election judges to verify voter identity. If a discrepancy is observed, the ballot is rejected and the voter receives a letter instructing them on how to cure (fix) the ballot by submitting another signature, by the 15th day after Election Day. Young voters are less likely to have signatures on file that



can be used for ballot signature verification. By completing this step, young voters can reduce the likelihood that their ballot will be rejected due to signature discrepancy, saving you time and ensuring your ballot counts!”

There should be an electronic method for voters to upload a signature in addition to allowing voters to return a signature on a postcard or other mailing.

- ❖ New rule 7.7.15 We are supportive of the new process for clerks to conduct a daily audit on signature verification decisions made by election judges. Signature verification is a critical process that ensures the security and integrity of our mail ballot elections; however, we are concerned by the observable disparity between county rejection rates which indicate disparate standards between counties, including similarly sized counties.

In the 2022 election, the rate of signature discrepancy ballot rejection averaged across all counties was .45%, and the mean value was .40%. 38 counties had rates lower than the statewide average, and 26 counties exceeded the average. Of those 26 counties that rejected signatures at a higher rate than the statewide average, there are clear outliers, with 2 counties exceeding a rejection rate of 1.5%, and the highest rate being 1.95%.