

COMMENTS REGARDING PROPOSED SOS RULES

Hearing Date: September 23, 2025

Rule 7.2.4 :

Partisan Election on a nonpartisan ballot

Concerns – how to track affiliation changes in SCORE as will SCORE do this in a nonpartisan election? Holding ballots out and tracking for bigger counties would be a nightmare if not able to do in SCORE – (no way to back date 22 days in SCORE)

Rule 7.7.8: 3% might be a high lift for bigger counties especially on Monday and Election Day.

Rule 7.8.5: We agree that a county must make all voting options available at every VSPC location. Current wording “ an election judge must offer all electors..... suggest a requirement to verbally offer all three options to every voter transaction. This will increase wait times at every VSPC location and will cause delays at the VSPC.

Suggestion: A sign at each VSPC that informs the voter of their three choices or

Rule 7.8.12: This requirement to provide video services will carry an implementation cost and raise challenges to counties that do not already have supportive technology. We ask the state to provide additional guidance.

- This will be an additional cost for hardware and software unless the state is going to furnish the software and hardware to each VSPC.
- Add language to the extent feasible otherwise counties may be required to remove voting locations (especially remote locations) that lack sufficient internet connection to stream video content.
- This service in many counties is not used via phone can this be a requirement maybe by Tier size. Example: Top 10 counties where it might get used.

Rule 7.9.4: Individual who serves as the county’s accessibility coordinator:

- What would the coordinator be required to do? Additional staff and possible liability concerns, what training? Would they have to meet state and federal requirements?
- Please provide clarification on this rule

Rule 16-1.3: It is not uncommon for covered voters to be in-person in October/November. These may be overseas citizens who are visiting local families or are in the military who have returned on leave. These voters often choose to vote in person rather than sign a mail ballot envelope that requires them to affirm and are subject to signature discrepancy issues.

- Please reconsider this rule as to not disenfranchise our UOCOVA voters.

Rule 19.3.4: Require election officials to attend at least one-in-person training class every year:

- Additional costs to counties to send staff yearly training when our budgets are already stretched thin.
- There are times when people are not able to do in person training every year: Example: Health issues, or family issues or working around other staff time off when in person training is taking place. **Smaller counties don't have the staff to cover when other staff are missing. This would require smaller counties to close their offices to attend in-person training for all staff.**

Rule 20-4-4: Please reconsider this rule for the following reasons:

- Many counties have key card access, and their ID badge is the same card. This would be an additional cost to change their system to make these cards separate.
- It is hard to get judges to keep track of their badges the way it is. If they have to have the access card and their ID separate could cause more problems.
- We don't give access to our judges to the outside of the building, and they do not take their name badges or the access cards home – these are locked in a secure lock box when not being used with an access log.
- Please explain why this is an issue and this is a proposed rule.