



ELECTION INTEGRITY COMMISSION 2014 ANNUAL REPORT

January 2015

ELECTION INTEGRITY COMMISSION MISSION STATEMENT

To provide independent oversight of the County election process and to review and make recommendations to the Board regarding election information technology systems as well as technical and procedural matters.

I. INTRODUCTION

The Pima County Election Integrity Commission (EIC) was created on July 1, 2008 by Board of Supervisors' direction. The ten voting members are appointed in the following manner: One member appointed by each of the five sitting Board of Supervisors members for a total of five; one member appointed by the County Administrator; one member appointed by each political party with party recognition in Pima County for a total of four. In addition to the ten voting members, one non-voting *ex officio* staff member is appointed by Pima County.

The Election Integrity Commission posts schedules, agendas and minutes for all meetings on its website:

www.pima.gov/commission/ElectionIntegrity.shtml

The Election Integrity Commission Annual report is a publication filed at the close of the calendar year. It is intended to keep Commission stakeholders, County executives/officials, and representatives apprised of important activities, election updates and other relevant information for those unable to attend monthly EIC meetings. The Annual Report will be distributed to the Board of Supervisors and Political Party officials via email, and posted on the EIC website.

II. EIC MEMBERS

Members are appointed to a term of two years from the date ratified by the Board of Supervisors.

NAME	OFFICE	APPOINTING AUTHORITY	TERM EXPIRES
Bill Beard		BOS District 1	November 17, 2016
Patrick Pecoraro		BOS District 2	Resigned from EIC December 14, 2014*
Tom Ryan	Chair	BOS District 3	July 31, 2016
Michael A. Duniho		BOS District 4	Resigned from EIC October 18, 2014
Beth Borozan		BOS District 4	December 4, 2016
Elaine Lim		BOS District 5	Resigned from EIC December 2014*
Arnold B. Urken		County Administrator	July 31, 2016
Barbara Tellman	Vice-Chair	Democratic Party	Resigned December 24, 2014**
Matt Smith		Green Party	February 28, 2016
Christopher D. Cole		Libertarian Party	May 14, 2015
Benny White		Republican Party	December 16, 2016
Brad Nelson		<i>Ex officio</i>	

* Replacement will be appointed January 2015.

** Resigned as EIC representative from Democratic Party to accept appointment from District 5. Replacement will be appointed January 2015.

III. 2014 MEETING SCHEDULE

Meetings were held at the Herbert K. Abrams Building, 6550 South Country Club Road in Tucson on the following dates:

- Friday, January 24, 2014
- Friday, February 21, 2014
- Friday, March 7, 2014 (Special Meeting)
- Friday, March 28, 2014
- Friday, April 18, 2014
- Friday, May 9, 2014
- Friday, June 20, 2014
- Friday, July 11, 2014
- Friday, August 15, 2014
- Tuesday, September 9, 2014
- Friday, October 17, 2014
- Friday, November 21, 2014

IV. 2014 ELECTIONS HELD

- May 20, 2014 Sunnyside Unified School District #12 Special Recall Election
- August 26, 2014 Primary Election
- November 4, 2014 General Election
 - Continental School District
 - Congressional District 2 Recount

V. IMPORTANT ISSUES IN 2014

- State and Federal Certification of Election Systems

The “State of Arizona Elections Procedures Manual” requires that all voting systems used in federal, state or county elections may only be certified for use in Arizona if they have been issued a certification number by the federal Election Assistance Commission (EAC). This requirement appears to preclude vendors who have a system that might otherwise meet State certification standards from bidding on a State or county request for proposal for an election system.

The Commission is aware of at least one modern system that cannot be federally certified because it lacks polling place scanners. Pima County is moving towards a system without such scanners yet the vendor was unable to bid on the procurement. For this reason, the EIC issued a recommendation to the Board to make a formal request to the Secretary of State to waive the EAC certification requirement. The recommendation is included in Section VI.1. The Board followed the recommendation by sending a request to the Secretary of State. The Secretary of State denied the request.

- Election System Procurement in Pima County

Pima County began the process for procuring a new election system in 2014 to replace the aging GEMS system currently in use.

Commission members Benny White and Tom Ryan attended meetings concerned with preparation of the RFP to replace central count scanners and election management system. Benny White and Barbara Tellman attended meetings concerned with final selection and evaluated the one proposal submittal (from ES&S). The bid was accepted and approved by the Board of Supervisors and will be ready to install in early 2015.

- Pima County Pilot Project
 - Removal of polling place scanners

A pilot study was conducted by the Pima County Elections Department during the August 26, 2014 Primary and November 4, 2014 General Elections. Twenty-five (25) precincts in the Primary Election, and twenty-one (21) precincts in the General Election were chosen in a variety of demographic and geographic locations. Ballot scanners were removed from these precincts and replaced with sealed metal storage boxes for ballot storage; the ballots were brought to Election Central for tabulation after the polls closed. The intent of the project was to determine viability of removing ballot scanners on a county-wide basis in the future. The rationale for the potential county-wide removal of precinct scanners is that the current AccuVote scanners are quickly reaching the end of their lifespans; the estimated \$1.8 million to replace precinct scanners may not be fiscally prudent given the trend towards increased early voting (estimated 75% in 2014 and projected 80% in 2016).

The EIC recommended that the County purchase new scanners for polling places, but the County decided to go forward without precinct scanners in order to save the purchase and maintenance costs. This has two primary impacts: first, there will be no way to notify polling place voters of unintended over-votes (as they have in the past), and second, the machine-based ballot counting will no longer be available, thereby requiring additional ballot custody and accounting procedures prior to ballot tabulation. The EIC recommendation is included in Section VI.3.

- Use of electronic pollbooks

In order to provide more timely voter registration data at the polling places, Pima County is planning on moving to electronic pollbooks. These tablet devices will make it possible to provide current registration information on the morning of Election Day, eliminate the expense of printing paper pollbooks, and generate voter history electronically instead of the current manual system. For the 2014 Primary and General Elections, a pilot study was conducted at the same 25 precincts in the Primary Election, and 21 precincts in the General Election where scanners were removed. Hard copy precinct rosters were available as back-up.

While the e-pollbooks seemed to be favorably received by voters and poll workers, data security is a concern when a third-party vendor has access to voter registration records, particularly when cloud storage is used. Development of an in-house database solution is currently under review by the Recorder's office for future use in e-pollbooks.

The Elections Department and Recorder's Office were not fully satisfied with the e-pollbooks. There were a number of shortcomings, including missing middle names, short battery life, and user interface issues. The County will consider other vendors as well as the possibility of developing an in-house solution.

The Commission is also concerned about the fact that e-pollbooks will connect to the Internet from polling locations to download the latest registration data. This presents potential security vulnerabilities that will need to be addressed.

- Cost of Elections in Pima County

Several years ago, the County Administrator asked the Commission to look into the escalating cost of elections in Pima County in order to determine where costs might be reduced in future elections. The Commission has been guiding the collection of election related cost data for both the Elections Department and the Recorder's Office. This effort has resulted in spreadsheets showing actual costs for 2012 Elections. Attachment 5 provides a summary of the findings.

Commission members were also interested in whether such data could be used to estimate the costs of certain potential changes in election procedures and equipment. Commission members asked the following questions:

1. What are the potential cost savings (per ballot and percent of budget) obtained by removing scanners from polling places?
2. What would be the increased cost to sort early ballots by precinct and do statistically valid hand count audits?
3. What would be the increased cost with a two-page ballot, or with a bifurcated ballot?
4. What would be the cost savings from all-mail elections?
5. What would be the cost savings of a closed primary system versus the existing open system?
6. What accounts for the difference between projected and actual costs for the 2014 elections?

The existing cost data is not adequate to address these questions. Additional data collection and analysis will be needed. Questions 1 and 6 will be addressed in 2015 along with comparisons of 2012 and 2014 costs.

- Bifurcated Ballot

As a result of the U.S. Supreme Court affirmation of the 9th Circuit Court of Appeals ruling that Arizona's proof of citizenship requirement conflicts with NVRA, the Arizona Secretary of State revised the "State of Arizona Elections

Procedures Manual” in 2014 to implement the Arizona Attorney General’s mandate for a “dual registration system, also known as a bifurcated system.” The dual registration system requires a “Full Ballot,” and “FED Only” ballot for voters who register using the national voter registration form and do not provide proof of citizenship. These new procedures required Pima County (as well as all other Arizona counties) to produce two separate ballots for use in the 2014 Primary and General Elections. Only 32 voters used the FED Only ballot in Pima County in the 2014 General Election.

- Compliance with Arizona’s Open Meeting Laws

The Election Integrity Commission received notification from the Arizona Attorney General’s office that a complaint had been filed by Mr. Huckelberry alleging that the EIC had violated Arizona’s Open Meeting Law in the May 9, 2014 meeting during the call to the public. Pima County agreed to cover the cost of legal counsel, and the issue was resolved out of court with no fines assessed. As a result, all EIC members received a briefing on Open Meeting Laws by the Pima County Attorney’s office during 2014, and an annual refresher will be incorporated into future EIC proceedings. In addition, all new EIC members will receive briefings soon after their appointments.

- Sorting of Early Ballots by Precinct for Hand Count Audit

In accordance with ARS §16-602, Pima County conducts a hand count audit of election results, in which randomly selected precincts are chosen for audit of ballots cast at the polling place, and randomly selected early ballot batches are chosen for audit. However, the method prescribed in Arizona statute and the “Procedures Manual” does not produce an end-to-end audit of early ballots, since Pima County does not sort early ballots by precinct before or after being tabulated. Some members of the EIC have a concern about the inability to detect fraud without conducting an end-to-end audit.

The EIC issued a recommendation to the Board of Supervisors to conduct a sorting experiment on early ballots during the 2014 election in order to determine the likely resources and effort needed to do an end-to-end audit on early ballots. This recommendation, included in Section VI.2, was rejected by the Board.

- Post-Election Database Distribution

Pima County is obligated to provide a distribution of the set of database files that store all election data. This distribution, which goes to the political parties on request, contains backup files recorded daily as well as the final post-election data file. Since Pima County has now purchased a new election management system (EMS), there will be differences in the way this

distribution is produced. It appears that the new system uses an encoded database that can only be read by the EMS. However, it also appears that the EMS is capable of exporting readable files containing the critical information contained in the previous GEMS distributions. The Commission will continue to track this topic in 2015 to determine the best way to implement the distribution requirement.

- Pima County – University of Arizona Election Systems Project

The Commission is exploring the idea of a collaborative project with the University of Arizona to investigate and plan our next purchase of an election system and to consider potential changes in election law, procedures, and regulations. Although the County has just purchased a new system, the Commission believes that it is not too early to be looking at technology that might be able to lower costs, improve reliability, and provide election transparency that could significantly reduce labor intensive activities such as ballot adjudication, audits and recounts.

Contact has been made with a U. of A. representative who has expressed interest. The project will continue in 2015.

- Pima County's Compliance with the "Presidential Commission on Election Administration"

The Presidential Commission on Election Administration issued a comprehensive report in January of 2014. This report covered a wide range of topics including technology, voter registration, poll worker training, resources, long lines, ballot complexity, and professionalism. The report issued a set of recommendations and best practices. The Commission has reviewed each of 43 recommendations. Pima County is substantially compliant with these recommended practices. The details are provided in Attachment 6.

Areas where Pima County might find ways to improve:

- Simple Ballots. Longer and more complex ballots are likely in Pima County because of recent Arizona law eliminating odd-year elections in municipalities. Good ballot design will help alleviate the problem.
- Poll Worker Recruitment. Pima County does not have a formalized broad-spectrum poll worker recruitment program. There has been no problem recruiting enough workers, but it would be beneficial to attract a younger and more diverse set of poll workers.
- Early Voting. Pima County provides in-person voting before Election Day but further expansion should be considered.

VI. RECOMMENDATIONS TO PIMA COUNTY BOARD OF SUPERVISORS

1. March 7, 2014: Memo to the Board recommending that the Board send a letter to the Arizona Secretary of State recommending that they waive EAC certification of election equipment as mandated in the Arizona Elections Procedures Manual. (See Attachment 1) The Board forwarded the recommendation but the request was denied by the Secretary of State.
2. July 18, 2014: Memo to the Board recommending early ballot sorting by precinct for the August 26, 2014 Primary Election as a feasibility experiment. (See Attachment 2) The recommendation was not accepted.
3. July 18, 2014: Memo to the Board recommending they not proceed with the procurement of new election system equipment unless precinct scanners are included. (See Attachment 3) The recommendation was not accepted.
4. November 24, 2014: Memo to the Board advising that the recount of CD2 using existing system violates state law. (See Attachment 4) The recommendation was rejected by the Board which relied on an opinion by the Secretary of State's office that the modification of tabulation parameters in the existing election software was sufficient to create a system that differs from the system used in the initial tabulation, as required by law.

VII. INPUT FROM PUBLIC

While not a requirement under Arizona's Open Meeting Laws, the Election Integrity Commission follows best practices by allowing members of the public to address the Commission during the Call to the Public segment of meetings. In 2014, the EIC heard from a variety of speakers from the public:

- May 9, 2014: The Sunnyside Recall Committee appealed to the Commission for support in directing the Pima County Elections Department to count the May 20, 2014 Recall Election ballots all at once on Election Day. Among the speakers were the Chair of the Recall Committee and candidates in the Recall Election.
- July 11, 2014: Speakers were heard concerning the County's suggestions to the EIC for legal representation in the matter of the Arizona Attorney General's investigation of a violation of the Open Meeting Laws.
- September 9, 2014: A voter addressed the EIC regarding problems she encountered at her polling location during the August 26, 2014 Primary Election.

EIC members are prohibited by Arizona's Open Meeting Laws from responding substantially to speakers' issues unless they are noticed on the meeting agenda. However, the Commission encourages public attendance and participation.

VIII. ATTACHMENTS

- Attachment 1: Memo to the Board recommending that the Board send a letter to the Arizona Secretary of State recommending that they waive EAC certification of election equipment as mandated in the Arizona Elections Procedures Manual.
- Attachment 2: Memo to the Board recommending early ballot sorting by precinct for the August 26, 2014 Primary Election as a feasibility experiment.
- Attachment 3: Memo to the Board recommending they not proceed with the procurement of new election system equipment unless precinct scanners are included.
- Attachment 4: Memo to the Board advising that the recount of CD2 using existing system violates state law.
- Attachment 5: Pima County Total Costs for 2012 Election
- Attachment 6: "Presidential Commission on Election Administration" Extract Spreadsheet

Date: March 7, 2014

To: Pima County Board of Supervisors

From: Election Integrity Commission

Subject: Recommendation to Waive EAC Certification Requirement in AZ Elections Procedures Manual

The Pima County Election Integrity Commission requests the Pima County Board of Supervisors to formally ask the Arizona Secretary of State to eliminate or waive a requirement stated in the Arizona Elections Procedures Manual that goes beyond state statutes and is a potential hindrance to the procurement of innovative election equipment.

A.R.S. §16-442 states that "election equipment may only be certified for use in this state and may only be used in this state if it complies with the Help America Vote Act of 2002 and if those machines or devices have been tested and approved by a laboratory that is accredited pursuant to the Help America Vote Act of 2002."

The Secretary of State's Elections Procedures Manual, however, includes an additional requirement for an "EAC certification number." At one time, obtaining an EAC certification number was standard practice, but in the last few years, the Election Assistance Commission has become increasingly dysfunctional. As noted in the recently released report from Presidential Commission on Election Administration, "the current standard-setting and certification process is unworkable and must be fixed. ... Either some other body within or apart from the EAC must be in charge of approving standards or the states should adapt their regulations such that federal approval is unnecessary."

Pima County needs new election equipment, but the set of EAC approved systems is extremely limited. Not only are there few vendors, but the equipment they offer has also been certified under outdated standards that discourage innovation. It is possible for a vendor to obtain certification by an accredited lab without getting an EAC certification number, and this is likely to become more and more common as the official EAC certification process becomes less and less relevant.

We would like to see the requirement for an EAC certification number removed from the Manual, or formally waived by the Secretary of State. This action could make it possible for additional vendors to respond to an RFP who otherwise would be prohibited.

We are attaching a draft letter to the Secretary of State from the Board that makes this request.

Respectfully,

Tom Ryan

Chair, Pima County Election Integrity Commission

Date:

To: Secretary of State Ken Bennett

From: Pima County Board of Supervisors

Subject: Request to Waive EAC Requirement in Arizona Elections Procedures Manual

The 2013 version of the Arizona Elections Procedures Manual states that an "EAC certification number" is required of all election equipment used in Arizona. This requirement is not found in state statutes. The Pima County Board of Supervisors hereby requests that this requirement be eliminated or waived.

A.R.S. §16-442 states "... election equipment may only be certified for use in this state and may only be used in this state if it complies with the Help America Vote Act of 2002 (HAVA) and if those machines or devices have been tested and approved by a laboratory that is accredited pursuant to the Help America Vote Act of 2002." There is no explicit or implied requirement for an EAC certification number. In fact, HAVA Section 231(a)(2) explicitly provides the option for states to provide for certification via accredited laboratories.

In Chapter 10, page 97 of the Manual, we find the phrase, "Upon issuance of a certification number by the Election Assistance Commission," And in Chapter 17, page 258, we find the requirement, "A complete application includes the following documentation: ... - EAC (NASED) Certification Numbers."

It is possible for a vendor to obtain certification by an accredited lab without getting an EAC certification number, and this is likely to become more and more common as the official EAC certification process becomes less and less relevant. As noted in the recently released report from Presidential Commission on Election Administration, "the current standard-setting and certification process is unworkable and must be fixed. ... Either some other body within or apart from the EAC must be in charge of approving standards or the states should adapt their regulations such that federal approval is unnecessary."

Pima County is in the process of writing an RFP for a new central count tabulation system and there is currently only one vendor with both an EAC certification number and Arizona certification. It appears that vendors are hesitant to pursue an EAC certification number due to the lack of a commission quorum and a lack of direction at the EAC. Because of this situation, we would like to relax the certification requirements stated in the Manual without amending Arizona law.

We therefore respectfully request that the requirement for an EAC certification number be removed from the Manual or formally waived by your office. This may make it possible for additional vendors to respond to Pima County's RFP.

Respectfully,

ATTACHMENT 2

ELECTION INTEGRITY COMMISSION

PIMA COUNTY  **ARIZONA**



TO: Honorable Chair and Members
Pima County Board of Supervisors

FROM: Barbara Tellman, Co-Chair
Election Integrity Commission

DATE: July 18, 2014

RE: Recommendation for Early Ballot Sorting by Precinct for
August 26, 2014 Primary Election as a Feasibility Experiment

Pima County conducts hand count audits of a prescribed number of randomly chosen ballots after Election Day. Both early ballots and precinct-cast ballots are hand counted but the early ballot audit has a significant shortcoming. This is easiest to understand if we think of the early ballot counting as consisting of three steps:

- 1) scanning of mixed-precinct ballot batches
- 2) sorting and accumulation of batch tallies in election management software
- 3) reporting results

Currently, the early ballot audit checks only step 1, which ensures that the central count scanners are working correctly. But this audit completely ignores steps 2 and 3 and would completely miss any error due to fraud or software bugs that might occur in such data handling. Both of these steps are dependent on the integrity of the election database, which is arguably the most vulnerable part of the system. The hand count audit of the precinct-cast ballots, on the other hand, has a chance of catching errors in all parts of the system.

The majority of the Commission feels that this discrepancy in the integrity of the audit should be fixed and that early ballots should be audited by precinct and counted in the same manner as precinct-cast ballots. Therefore, the Pima County Election Integrity Commission, by a 5-4 vote, requests that the Pima County Board of Supervisors direct the Elections Department to conduct a pilot study during the August 26, 2014 Primary. In this pilot study, early ballots would be scanned as usual. Only ballots scanned prior to 7:00 p.m. on Election Day would be involved. After scanning and after the random selection of precincts for audit, ballots associated with two audit precincts would be found and removed from boxes. These ballots would be hand counted as part of the post-election hand count, and the count compared with the machine count for those precincts as registered by 7:00 p.m. on Election Day.

This pilot study will determine how long it takes to find the required early ballots. The efficiency of the process, as well as maintaining the integrity of the ballots and adherence to Arizona law through the process will be the main factors in determining the feasibility and desirability of sorting early ballots for audit in future elections.

Sincerely,

Barbara Tellman
Co-Chair, Election Integrity Committee

ATTACHMENT 3

ELECTION INTEGRITY COMMISSION

PIMA COUNTY  **ARIZONA**



TO: Honorable Chair and Members
Pima County Board of Supervisors

FROM: Barbara Tellman, Co-Chair
Election Integrity Commission

DATE: July 18, 2014

RE: Recommendation to Not Proceed at this time with Procurement of
New Election System Equipment unless Precinct Scanners are included.

The Procurement Department of the Pima County Government issued an RFP for purchase of new election equipment. Evaluation has been done by a procurement committee, including two members of the Election Integrity Commission. A recommendation will come to the Board of Supervisors soon.

By majority vote (5-2), the Election Integrity Commission recommends that the Pima County Board of Supervisors not proceed with the purchase of the ES&S EVS central count system as currently proposed without the inclusion of precinct scanners. The majority believes that precinct scanners must remain an integral part of elections and that the decision to purchase new equipment should include both.

Sincerely,

Barbara Tellman, Election Integrity Commission Co-chair

ELECTION INTEGRITY COMMISSION

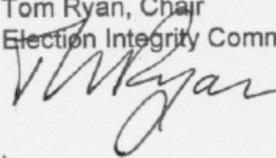
Pima County, Arizona

TO: Honorable Chair and Members
Pima County Board of Supervisors

FROM: Tom Ryan, Chair
Election Integrity Commission

DATE: November 24, 2014

RE: Recount of CD2 Using Existing System Violates State Law



The 161 vote margin between candidates Ron Barber and Martha McSally in CD2 will trigger an automatic recount of the ballots as required by state law. Pima County Elections is planning to recount all of the paper ballots on existing central count equipment using the same software and hardware used for the General Election, but only recording votes from ballots that contain the CD2 race. The program that would do the recount, GEMS, is exactly the same program used for the initial tabulation. A review of Arizona law shows that the proposed recount plan violates state law.

ARS §16-664(C) states:

The programs to be used in the recount of votes pursuant to this section shall differ from the programs prescribed by § 16-445 and used in the initial tabulation of the votes. (ARS § 16-445 refers to the filing of computer programs with the Secretary of State.)

The State of Arizona Election Procedures Manual, revised 2014, page 226, states:

The programs used shall not be the programs submitted to the Secretary of State and used in the initial tabulation of the votes.

ARS § 16-444 defines "computer program":

"Computer program" includes all programs and documentation adequate to process the ballots at an equivalent counting center.

ARS §16-664(A) states, in part:

... the secretary of state shall order the ballots recounted on an automatic tabulating system to be furnished and programmed under the supervision of the secretary of state. In the event of a court-ordered recount for elections other than for the office of supervisor, the secretary of state may designate the county board of supervisors to perform the duties assigned to the secretary of state.

This last paragraph suggests that the Board of Supervisors might find itself in the position of directing the recount and therefore selecting an alternative program for the recount.

It is the opinion of the Commission that use of the GEMS program to recount CD2 votes does not constitute a different program as required by law. Since the recount must be done using a different program, the Commission sees only two viable options:

Honorable Chair and Members
Pima County Board of Supervisors
November 24, 2014
Page 2

Option 1. Hand counting all of the ballots (274,449 less the few ballots cast on touchscreen devices), or

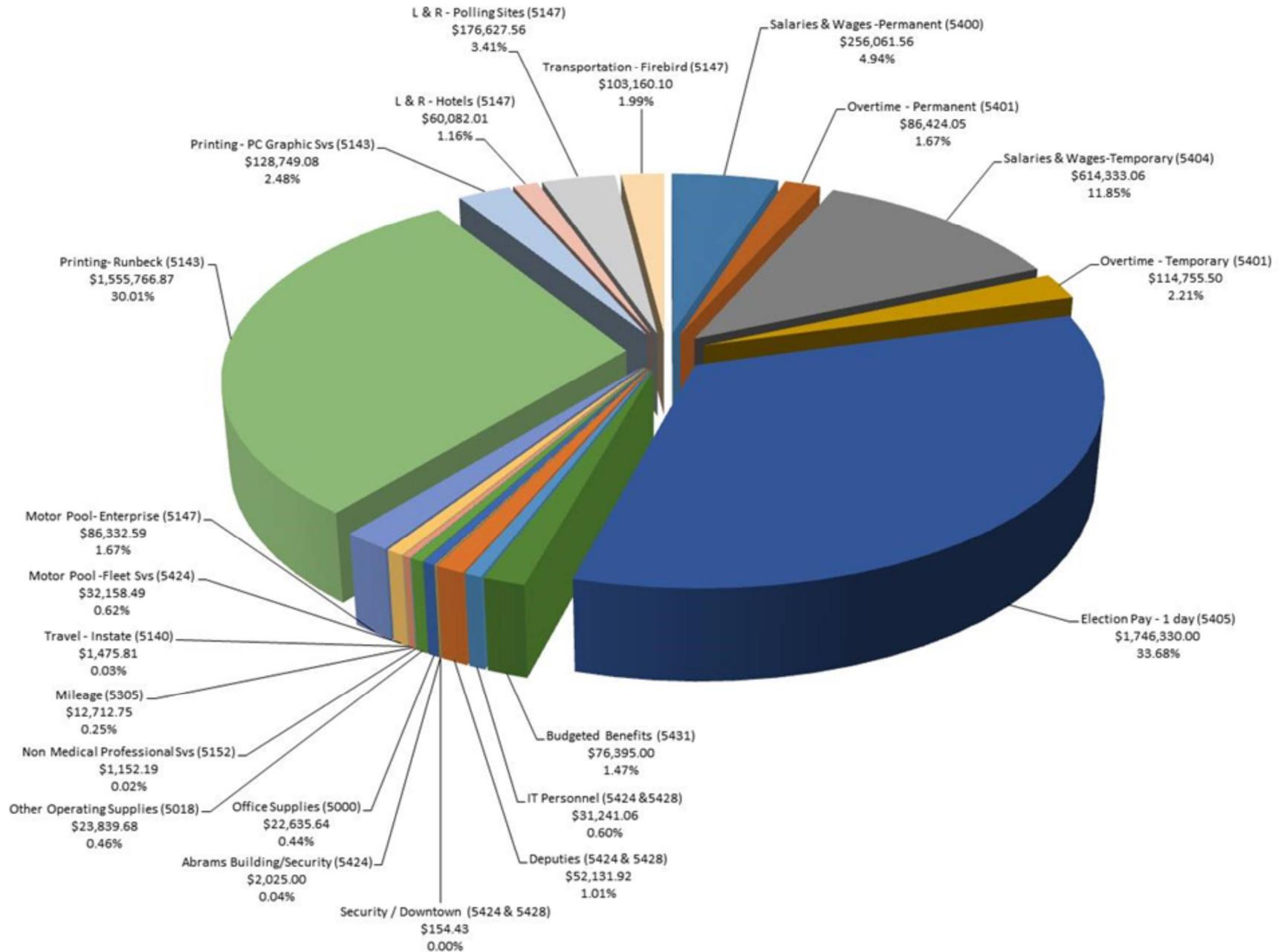
Option 2. Engaging the services of Clear Ballot Group, a company that uses ballot imaging and automated image analysis to tabulate elections and conduct audits. Clear Ballot has demonstrated the capability of handling the style of ballots used in Pima County.

The Commission does not have another regular meeting scheduled until January, but we are available to have a special meeting to address any issues regarding the recount as requested by the Board.

TR:ssb

Pima County Total Elections Department Costs 2012 Election Cycle

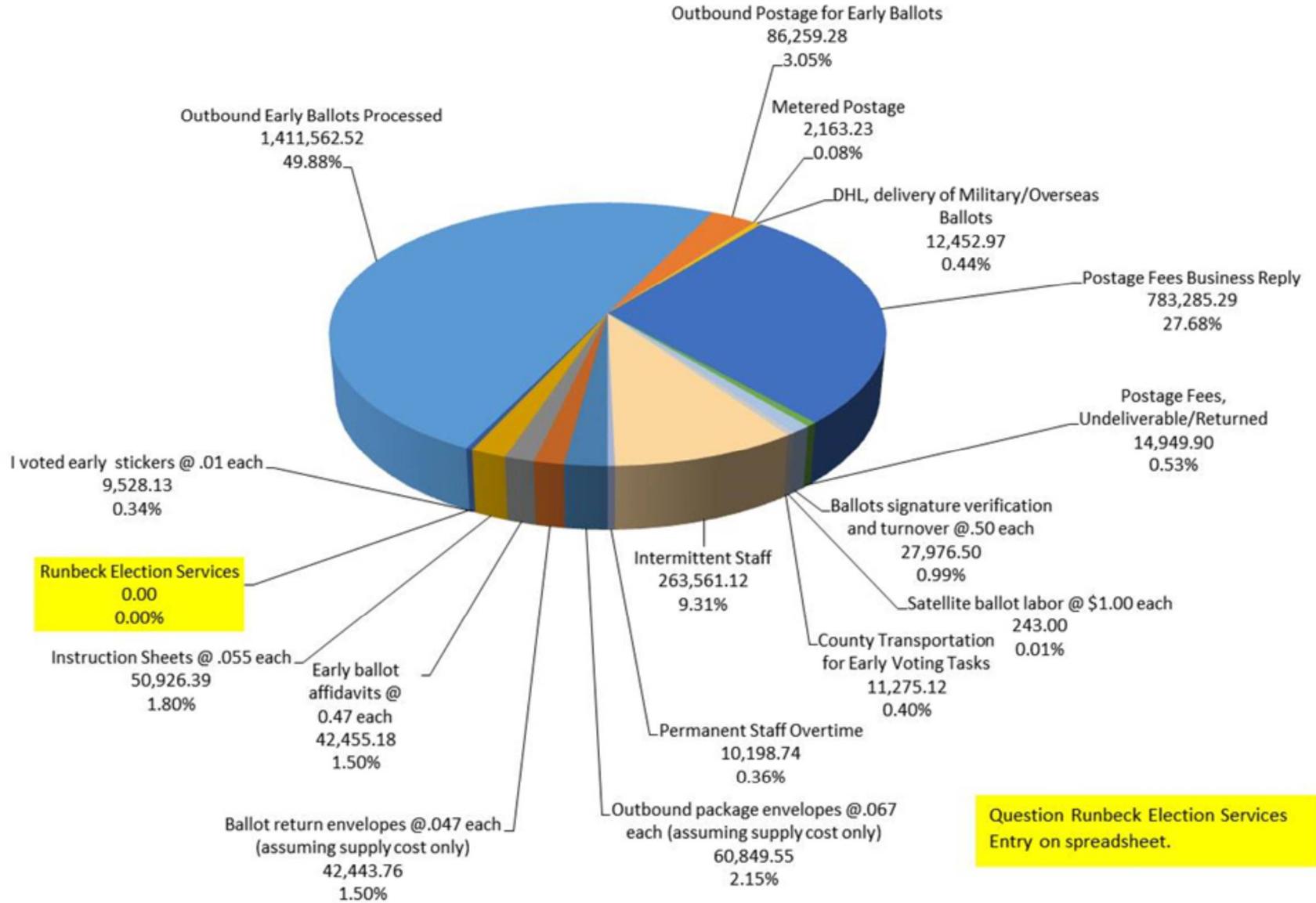
Total \$5,184,544.35 (Reimbursements \$1,928,932.09) = \$3,255,612.26 Net Costs



Pima County Total Recorder's Office Costs 2012 Election Cycle Early Ballot Portion

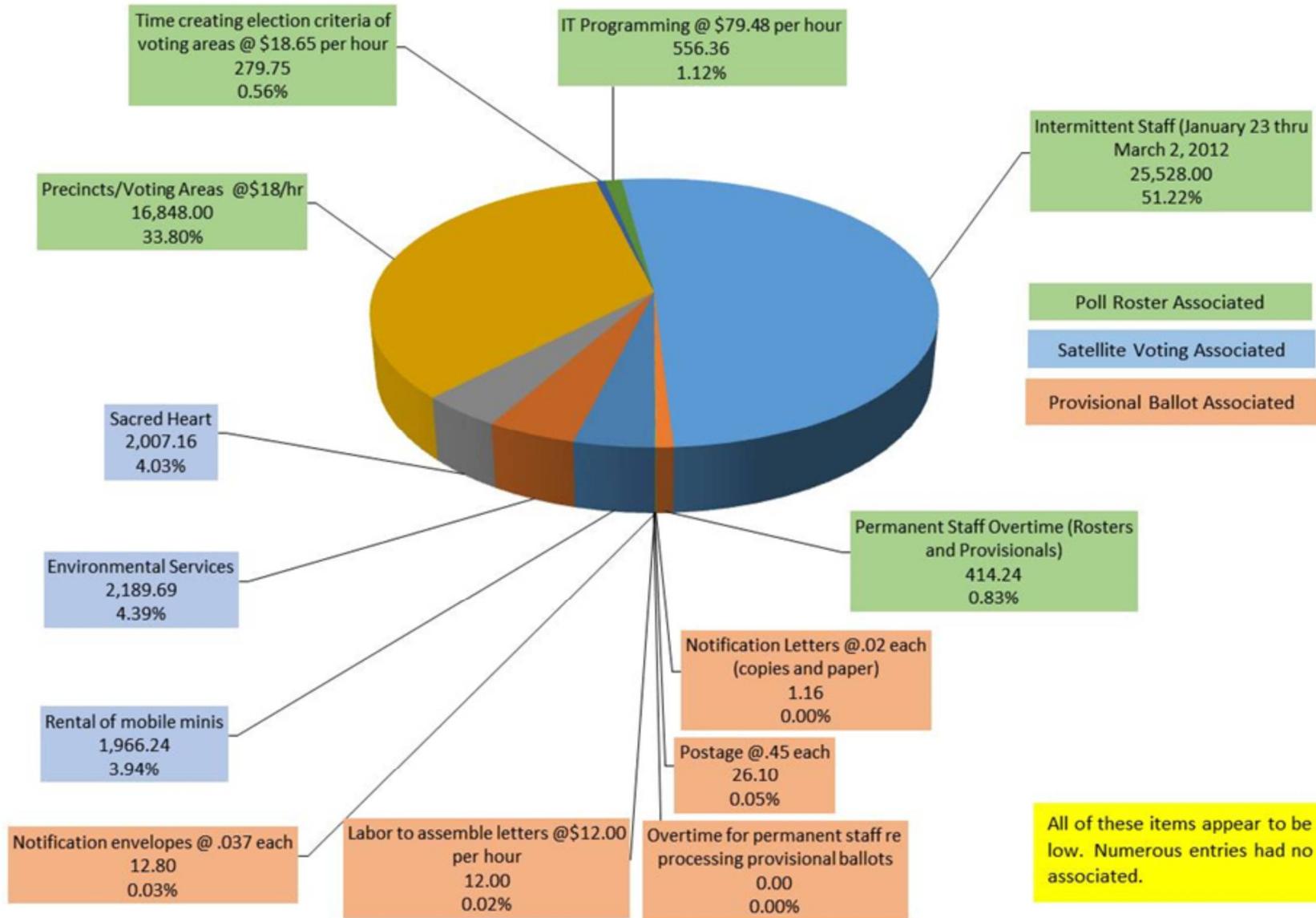
Total \$2,830,130.68 (No Reimbursables Reported)

Total Recorder's Office Costs \$2,879,972.18



Question Runbeck Election Services Entry on spreadsheet.

Pima County Total Recorder's Office Costs 2012 Election Cycle Satellite Voting, Poll Rosters, & Provisional Ballot Portions Satellite Voting \$6,163.09 Poll Rosters \$43,626.35 Provisional Ballots \$52.06 (No Reimbursables Reported)



All of these items appear to be extremely low. Numerous entries had no cost associated.

Presidential Commission on Election Administration

Topic	Recommendation	Best Practices	Juris.	Compliance Status
<p>Voter Registration</p>	<p>States should adopt online voter registration</p>	<p>Online registration tools, like the ones made available on the Commission's website, can facilitate registration through web portals of other state agencies and outside groups</p>	<p>State</p>	<p>Arizona is in compliance.</p>
	<p>Interstate exchanges of voter registration information should be expanded</p>	<p>States should join interstate programs that share data and synchronize voter lists so that states, on their own initiative, come as close as possible to creating an accurate database of all eligible voters</p>	<p>State</p>	<p>Pima County is in compliance through a pilot project. The length and funding for this pilot project was unknown; perhaps Recorder's Office personnel would have background information on it.</p>
	<p>States should seamlessly integrate voter data acquired through Departments of Motor Vehicles with their statewide voter registration lists</p>	<p>States should adopt procedures like those in Delaware that lead to the seamless integration of data between DMVs and election offices</p>	<p>State</p>	<p>Arizona is in compliance.</p>
<p>Improved Management of the Polling Place</p>	<p>Schools should be used as polling places; to address any related security concerns, Election Day should be an in-service day</p>	<p>Polling places should be located close to voters and designed to have sufficient space and parking, accessibility for voters with disabilities, and adequate infrastructure</p>	<p>County</p>	<p>There was discussion as to whether or not Pima County is in compliance as Precincts are merged. There is Legislation that would allow schools to be used as polling places with the schools closed on Election Day. It was decided that action would be taken after the Commission sees what happens in the Legislature.</p>
		<p>Local officials should maintain a diagram of every polling place used in the jurisdiction that provides room dimensions, location of power outlets, the proposed positioning of voting and voter processing equipment, the entry and exit routes, and signage required by the Americans with Disabilities Act</p>	<p>County</p>	<p>Pima County is in compliance.</p>
		<p>The diagrams should be maintained in the clerk's office, provided to the election official responsible for the polling location on Election Day, and updated before every election</p>	<p>County</p>	<p>Pima County Elections Department keeps all surveys in house.</p>
	<p>States should consider establishing vote centers to achieve economies of scale in polling place management while also facilitating voting at convenient locations</p>		<p>State</p>	<p>Arizona is in compliance.</p>
	<p>Jurisdictions should develop models and tools to assist them in effectively allocating resources across polling places</p>	<p>Employ "line walkers" to address potential problems among voters before they reach a check-in station where their registration is verified</p>	<p>County</p>	<p>In compliance.</p>

	Voters should be given better information on line length before they go to the polling place, such as providing an internet feed from individual polling places	County	Pima County hasn't had lines in a long time. Arizona is in compliance.
	Election officials should employ insights from queuing theory concerning the flow of voters, the points of service in the polling place, and the time it takes to verify registration and to vote	County	
	To prepare for Election Day, jurisdictions must accurately estimate the number of registered voters per precinct and the share that will turn out, and be able to react to data gathered in the critical three-month period prior to an election when the factors affecting turnout are most relevant	County	In compliance.
	Election officials should pretest the length of time it takes an average voter to vote a ballot in order to accurately estimate how many poll workers, machines and voting stations will be needed at each voting location	County	In compliance.
	The sample ballot, along with polling locations and times, should be made available to voters no later than the beginning of in-person early voting or three weeks before Election Day so that voters will be able to make their choices before entering the polling place	County	Arizona is not in compliance with the "Best Practices" recommendation but current practice is prudent. Sample ballots are mailed in compliance with A.R.S. Title 16 and Arizona Secretary of State's Procedures Manual, which prescribe that sample ballots shall be mailed at least eleven days before the election.
	If the state law allows, jurisdictions should reduce the length and complexity of the ballot in Presidential election years	County	Arizona is moving away from being compliant.
Jurisdictions should develop models and tools to assist them in effectively allocating resources across polling places	Election officials need greater access to industrial engineering tools that are regularly employed by the private sector to help manage customer service queues	County	In compliance.

	Election officials should take advantage of the "resource calculators" available through the Commission web site at www.supportthevoter.gov and hosted by the Cal Tech-MIT Voting Technology Project to aid in making decisions on how to allocate limited voting resources	County	Pima County has similar criteria for evaluating and implementing methods to best process voters in a satisfactory amount of time.
	Election officials should keep track of wait times at individual polling places using simple management techniques, such as recording line length at regular intervals during Election Day and giving time-stamped cards to voters during the day to monitor turnout flow	County	
	In polling places with a history of long lines, local election officials should analyze the reasons for excessive wait times and develop plans for avoiding the problem in the future. Local election officials should provide copies of these plans to the relevant chief state election official	County	Predominantly voters taking a long time voting their ballots. Wait times also can occur at the signature table and special situations table.
Jurisdictions should transition to electronic pollbooks		County	Pima County is in the process.
	Jurisdictions should utilize the many recommendations made available in the relevant EAC report, Successful Practices for Poll Worker Recruitment, Training and Retention	County	Pima County has comprehensive procedures for tracking poll worker availability and contact updates (as well as any complaints that might disqualify them). New training manuals and supplemental online training will be available. It is recommended that Pima County Election Department training staff read the "Successful Practices" manual.
Jurisdictions should recruit public and private sector employees, as well as high school and college students, to become poll workers		County	Pima County does not have a formalized broad-spectrum recruitment program, but does recruit high school students by reaching out to poll workers for referrals such as a family member. Civic organizations that inquire generally decline due to long hours required.
	State-developed programs should be implemented that recognize employers for supporting their employees who wish to work on Election Day	State	This is a state issue.
States should institute poll worker training standards		State	There are no state standards, <i>per se</i> , other than that the Procedures Manual can be used as a guide. This is generally left up to the individual jurisdictions.

	Different equipment used in different counties necessitates different training programs, but states must still achieve uniform application of their legal standards	State	This item may be directed to states where poll worker training is done by the state. In Arizona the Procedures Manual goes to all counties, providing the uniform legal standards. Election Department and Recorder's Office permanent employees are trained and tested by the Arizona Secretary of State's office to become Certified Election Officers.
Election authorities should establish advisory groups for voters with disabilities and for those with limited English proficiency		County	Pima County works with Arizona Center for Disability Law and several other advocacy groups. Ballot translations are made through court certified text translators for Spanish language; an O'odham contractor through the Tohono O'odham Nation for recorded ballot translation; Arizona School for the Deaf and the Blind for braille ballots as needed.
	Election authorities should make every effort through their own websites and traditional communication outlets (especially through non-English language media) to reach these voters	County	The Pima County Elections Department website offers the viewer the option of translating text to Spanish, and the phone has an option for reaching a Spanish speaking employee. In the event of a request for another language there is a resource through Superior Court that is available.
States and localities must adopt comprehensive management practices to assure accessible polling places		State, County	Pima County evaluates polling places using the ADA survey published by the Department of Justice and works with the Arizona Center for Disability Law to review locations.
	A checklist ensuring that each polling place is accessible should be kept by the responsible election official for each election and kept on file to prepare for the next election	State	In addition to the surveys, pictures are taken as necessary.
	Within the polling place, elderly voters and voters with disabilities waiting their turn to vote must have access to chairs while waiting and then, when their turn to vote comes, to the machinery	County	Seating is available in the polling place, as well as along the route from the parking lot to the voting area if it is a substantial distance.
	Video guides from San Francisco on how to set up an accessible polling place and from Pennsylvania on educating poll workers on voters with disabilities are models for other jurisdictions	County	
States should survey and audit polling places to determine their accessibility		County	Answered above.

		Jurisdictions should provide bilingual poll workers to any polling place with a significant number of voters who do not speak English	County	In the polling locations, “Se Habla Español” stickers are worn by poll workers who speak Spanish. An attempt is made to have a Spanish speaking poll worker in every polling location regardless of demographics, and polling places in areas with high numbers of Hispanic surnames are staffed almost entirely with Spanish speaking poll workers.
	Jurisdictions should test all election materials for plain language and usability		County	The Elections Department looks at the ballot every time [while under design] as from the eyes of a first time voter for clarity. Proposition summary language on ballots is determined by the Secretary of State and the legislative council.
Voting Before Election Day	States should expand opportunities to vote before Election Day		State, County	In discussion with F. Ann Rodriguez, Pima County Recorder, Benny White suggested expansion of hours of early voting sites till 8:00 p.m. on some of the days to allow working voters the opportunity to vote after work, especially the last week of early voting; and having early voting sites open on Saturdays during the early voting period. Ms. Rodriguez will take these suggestions into consideration and make a decision in June or July.
		States should not simultaneously expand early voting and excessively reduce the resources available for Election Day	County	Pima County has not excessively reduced resources; although the number of precincts has been reduced, there are not normally long wait times to vote on Election Day. Accommodations for voters with transportation and other issues have been met with the availability of early mail balloting.
		States should adopt safeguards for mail balloting, including online tracking of absentee ballots so voters can verify the status of their ballot	County	The Pima County Recorder’s office website has a link for a voter to check the status of their early ballot—when verified and when turned over to the Elections Department for tabulation.
Military and Overseas Voters	States should provide ballots and registration materials to military and overseas voters via their websites		County	It is assumed that the Pima County Recorder's office is doing this.
		Both the Federal Write-in Absentee Ballot and the Federal Postcard Application should be considered as valid voter registration applications	State	It is assumed that the Pima County Recorder's office is doing this.
		However they may transmit their ballot, overseas and military voters would benefit from a system that allows them to create on their attached printer a ballot with a barcode that can be read by the local election administrator	County	It is unclear to the EIC what the intent of this item is.

Growing Challenges with Election Equipment and Voting Technology	The standard-setting and certification process for voting machines must be reformed		Federal, State	This is a State and Federal issue.
	Audits of voting equipment must be conducted after each election, as part of a comprehensive audit program, and data concerning machine performance must be publicly disclosed in a common data format		County	The Elections Department does a precinct audit after each election where the GEMS tabulation is compared to the poll list from each precinct on two offices to verify a match. The Hand Count Audit is also conducted after each election.
Collection and Distribution of Election Data	Local jurisdictions should gather and report voting-related transaction data for the purpose of improving the voter experience		County	Pima County does not have substantial problems, though use of time-stamping in the electronic poll books and reports from polling place marshals such as hourly counts of voters in line may be useful indicators.
		Wisconsin has a model election data-gathering program. Voting machine manufacturers should add functionality to their machines to help gather data, which jurisdictions should widely disseminate in a standard data format	County	The format for reporting county vote totals to the Arizona Secretary of State is not specified; the format for reporting Hand Count Audit results is specified by the Secretary of State.