

SANTA CLARA COUNTY
ELECTION ADMINISTRATION PLAN

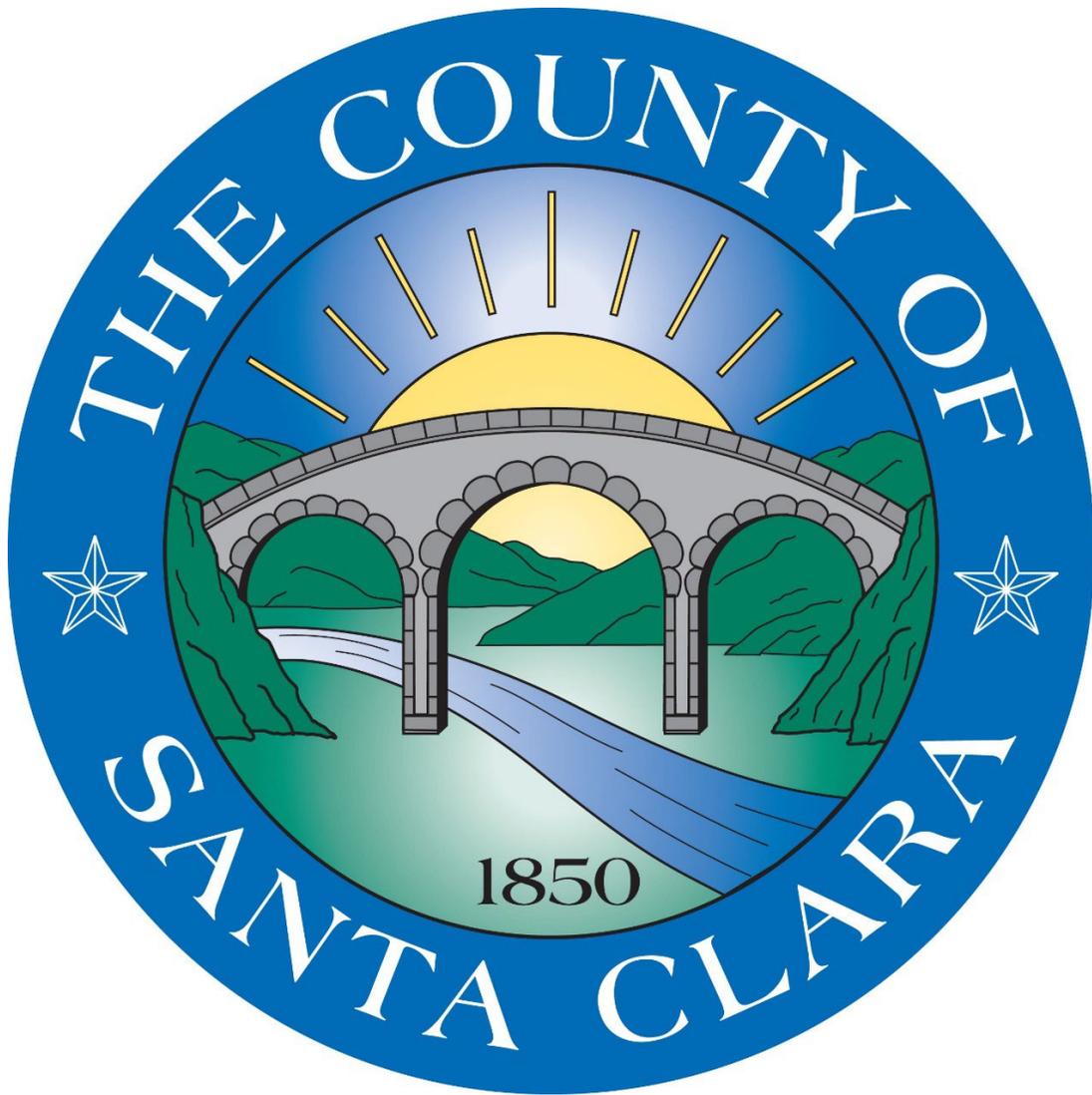


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Introduction

The California Voter's Choice Act (VCA), or Senate Bill (SB) 450 (Allen, D-26) was signed into law on September 29, 2016, adding Section 4005 to the California Elections Code, allowing authorized counties, upon approval of their Board of Supervisors, to conduct any election by mail, with certain requirements. Under VCA, all voters would be mailed a ballot commencing 29 days before the election, and each county would establish, with public input, numerous Ballot Drop-off Locations and Vote Centers throughout the county where any county voter may cast their ballot. This legislation was one of many election reforms designed to change how elections may be conducted in order to increase voter participation and voter engagement by expanding voting options.

Before VCA, elections were conducted under the traditional Polling Place Model. This was a combined model of vote-by-mail and polling place administration. Elections Code §12261(a) mandated the County Election Officials establish voting precincts, with a maximum of 1,000 voters and each with a distinct voting location (which also serves to be the data that allows the county and the state to report election results by each voting precinct). Only those with physical limitations could be on the list of Permanent Vote-by-Mail voters; anyone else who wanted to vote by mail had to submit a request each election. A voter who did not vote by mail was required to vote at their assigned voting location that was distinct to their voting precinct and ballot type.

Then, in 2002, the California Elections Code expanded vote-by-mail and permitted anyone to become a Permanent Vote-by-Mail voter. This expansion generated a change in voter behavior where now a majority of voters in Santa Clara County are requesting to vote by mail rather than appearing to vote in person at their assigned voting location. Those registered as Permanent Vote-by-Mail voters are mailed their ballot approximately 29 days before an election and have up until the close of polls on Election Day to return that ballot, whether at a polling location, at a Ballot Drop-off Location, or by mail.

With the implementation of VCA, elections will be conducted under a new Vote Center Model. With the new model, *every* registered voter will be a vote-by-mail voter and receive an official vote-by-mail ballot in the mail, commencing 29 days prior to the scheduled election. Voters will be able to return their ballot any of three ways: by mail (postage paid), at any Ballot Drop-off Location, or at any Vote Center in the county. Voters may also choose not to return their vote-by-mail ballot and instead obtain a ballot to vote in person at the office of the Registrar of Voters (ROV) or at any Vote Center in Santa Clara County.

The Vote Center Model will not change much for current Permanent Vote-by-Mail voters. It mainly changes procedures for voters who would typically visit their assigned polling place on the day of the election to cast their vote. Now, rather than voters only having one location to vote, Vote Centers will be open to all registered voters in the County.

This Election Administration Plan (EAP) includes content essential to understanding how voters will be affected by this change. Upon completion of an EAP draft, the ROV will seek public comment, feedback, and suggestions before finalizing this plan. With the posting of each subsequent amended draft EAP, the public will be provided a public comment period to offer feedback on the EAP, and amendments, including locations selected as Vote Centers and Ballot Drop-off Locations. Upon conclusion of the public comment period, the County's final EAP will be formally adopted and submitted to the California Secretary of State (SOS) for approval.

To further ensure that the community is fully informed of the VCA changes, the ROV established both a Voting Accessibility Advisory Committee (VAAC) and a Language Accessibility Advisory Committee (LAAC). The purpose of the VAAC is to advise, assist the enhancement of, and provide recommendations regarding access to the electoral process by seniors and persons with disabilities. The VAAC's mission is to provide all voters the opportunity to vote independently and privately. The

purpose of the LAAC is to advise, assist and provide recommendations on matters relating to language accessibility to the electoral process by voters who primarily speak a language other than English. It is the mission of the LAAC to assist with the enhancement of language accessibility opportunities. Both committees offer important guidance to the ROV and are fundamental components of both voter outreach and election administration for the County. The ROV accepts applications for membership to either the LAAC or VAAC on an ongoing basis. To apply for membership to either committee, the application can be found on the ROV's website: www.sccvote.org/voterschoice.

The ROV also plans to establish a Voter Education and Outreach Coalition (VEOC) to expand its voter education program to inform residents about VCA and opportunities for community involvement. The EAP includes feedback and information from these committees and various partner organizations. Gaining community support will be crucial to the successful implementation of VCA and new methodology of administering elections in Santa Clara County.

The first election conducted under VCA will be the March 3, 2020 Presidential Primary Election. This document provides a guide on how Santa Clara County plans to implement VCA for this and future elections. For reference, any technical or election-specific terms will be defined in the glossary in Appendix A and a list of Frequently Asked Questions can be found in Appendix R.

Part 1 – Election Administration Plan

Each county implementing the Voter's Choice Act (VCA) must draft an Election Administration Plan (EAP) containing information essential to understanding how the changes will affect voters. The EAP will be divided into two parts: Part 1 - Election Administration and Part 2 - Education and Outreach Plan.

Vote-by-Mail (VBM) Process

The EAP includes information about Vote Centers and Ballot Drop-off Locations and hours, establishment of both a Language Accessibility Advisory Committee (LAAC) and a Voting Accessibility Advisory Committee (VAAC), a voter education and outreach plan, public input and notification considerations, and other related content.

In the Vote Center Model, all registered voters will become vote-by-mail voters and will be sent a vote-by-mail packet. The packet will be sent to voters in a white envelope that will contain the following:

- A blue return envelope
- The official ballot, which may be on multiple ballot cards depending on how many contests there are for the election
- A sheet with instructions on how to complete and return the ballot
- A sheet with Vote Center & Ballot Drop-off Locations and hours of operation
- An "I Voted" sticker
- An extra sheet containing any additional information, if needed

All ballots will be mailed via the United States Postal Service starting 29 days prior to Election Day. Voters should start receiving their vote-by-mail packets shortly thereafter.

Once they have completed their vote-by-mail ballot, voters may return their ballot by standard mail in the postage-paid envelope provided, or by returning the ballot at any Vote Center or Ballot Drop-off Location. All Vote Centers will also serve as a Ballot Drop-off Location, while some Ballot Drop-off Locations will be stand-alone and placed around the county in designated areas.

Should a voter not receive their ballot in a timely manner, or if they made an error on their ballot, they can request that their ballot be replaced. A new vote-by-mail packet will be mailed to them with their replacement ballot. If they need their ballot replaced less than seven days before Election Day, they will need to visit the Registrar of Voters (ROV) office, or any Vote Center to get a new ballot.

For registered voters who primarily speak a language other than English, ballots will be made available in eight languages: Chinese, Spanish, Tagalog, Vietnamese, Khmer, Korean, Hindi, and Japanese. Of these languages, voters can specify their preferred language on the registration form when they register to vote. Ballots and vote-by-mail materials will be sent to them in their preferred language. Voters can also request to change their language preference by contacting the ROV office by phone ((408) 299-VOTE), fax ((408) 998-7314), email (voterinfo@rov.sccgov.org), in-person, or through a Voter Action Request Form (VARF). A voter can pick up the VARF at the ROV office, or it can be emailed, faxed, or mailed to them. Alternatively, the VARF can be found on the ROV website and also found within the County Voter Information Guides (CVIG).

Accessible Voting by Mail

Voters can also request voting materials in an accessible format by contacting the ROV office. Once a voter makes that request, they are placed on a permanent list and will have accessible voting materials sent to them every election. They are only removed from the list if they become inactive, move out of county, appear on a list of felony offenders, or pass away.

Another accessible option that voters may request is to utilize the Remote Accessible Vote-by-Mail (RAVBM) system. The RAVBM system is designated for use only by registered voters with disabilities, as well as for military and overseas voters¹. The purpose of the RAVBM system is not to cast a ballot over the internet. RAVBM voters are sent an email with a link to access their Official Ballot, along with instructions on how to download, print, complete, and return their ballot to the ROV by Election Day. Voters, using the emailed link, must download the ballot to their devices to read and mark the ballot with their own personalized accessibility features. As with any registered voter, there are three ways an RAVBM voter may return their ballot: via standard mail, by dropping their ballot in a ballot drop-box, or by returning it at any Vote Center.

Regardless of the return method chosen, ballots must be returned in an envelope. It is recommended that voters use the blue return envelope that was included in their Vote-by-Mail envelope. They may request replacement ballot return envelopes by calling the ROV toll free at (866) 430-8683 or may pick one up at the ROV Office or at a Vote Center. Replacement ballot return envelopes will also be made available at Ballot Drop-boxes. Voters may also choose to use their own envelope, but they must include a printed and signed Oath of Voter page enclosed with their ballot. The Oath of Voter page is to be downloaded along with the ballot through the RAVBM email link. If returning the ballot via standard mail, the blue ballot return envelopes do not require any postage, while sufficient postage will be needed when returning using own envelope.

For hospitalized and disabled voters, as well as voters confined to their homes due to a medical emergency, the Emergency Ballot Delivery procedure is used when voters need a ballot and are unable to retrieve their ballots personally. An Early Voting Application (Appendix B) is required to be filled out and returned to be verified for current registration and signature match through the ROV's Election Information Management System (EIMS). The registered voter must complete, sign, and date the Early Voting Application. If the voter cannot sign their application, someone can help assist the voter sign it with an "X". The representative assisting the voter should write "witnessed by", and print and sign their name and return the completed Early Voting Application to the ROV Main Office on Berger Drive. The ROV Office will verify the voter's information and signature in EIMS, and once verified, a ballot may be issued to the voter and a complete vote-by-mail packet is prepared. The representative assisting the voter will then take the ballot to the voter at their respective location. Once completed, the ballot may be returned to the ROV Main Office, any Vote Center, or any drop-box location for processing in conjunction with other vote-by-mail ballots.

Voters incarcerated in county jail may also make use of the Emergency Ballot Delivery procedure. Voters incarcerated in state or federal prison are ineligible by law to vote.

Ballot Drop-off Locations

Per the February 2019 Report of Registration from the Secretary of State (SOS), the eligible voter population in Santa Clara County is around 1.2 million people. Currently, approximately 910,000 people in the county are registered to vote. The ROV anticipates that number to climb up to 1 million registered voters by the March 2020 Presidential Primary Election. Using these numbers, the California Elections Code sets the parameters by which a county must provide Ballot Drop-off

¹ See California Elections Code §303.3

Locations for voters:

There must be at least one (1) Ballot Drop-off Location for every 15,000 registered voters available 28 days before Election Day, and on Election Day, for a total of 29 days. See Appendix C for the map of proposed Ballot Drop-off Location boundaries.

Using the Registrar of Voters' (ROV) anticipated number of registered voters, the minimum required number of Ballot Drop-off Locations is 67. The ROV plans to have at least one Ballot Drop-off Location in every district for a total number of 91 targeted drop-box locations. See Appendix D for the current list of proposed drop-box locations and their respective hours of operation.

Boundary Category	Minimum Requirement	Proposed² Number
Ballot Drop-off Locations (1 for every 15k registered voters)	67	91

To determine the best locations for ballot drop-boxes, the ROV used the 14 criteria mandated by the SOS and Elections Code to help determine the most efficient places for Vote Center locations. These 14 criteria aid the ROV in providing the County with the most accessible locations available for ballot drop-boxes as well. The criteria include:

1. Proximity to public transportation
2. Proximity to low vote by mail usage communities
3. Proximity to population centers
4. Proximity to language minority communities
5. Proximity to voters with disabilities
6. Proximity to low rates of vehicle ownership communities
7. Proximity to low-income communities
8. Proximity to low voter registration rate communities
9. Proximity to geographically isolated populations, including Native American reservations
10. Accessible and free parking
11. Distance and time to travel to Vote Center and Ballot Drop-off Locations
12. The need for alternate methods for voters with disabilities for whom vote by mail ballots are not accessible
13. Traffic patterns near Vote Center and Ballot Drop-off Locations
14. The need for mobile Vote Centers

The ROV complies with the Americans with Disabilities Act (ADA) requirements for the Official Ballot Drop-boxes for transportation and population density to better accommodate voters with disabilities. Ballot drop-boxes will be placed in their respective locations starting 29 days before Election Day. By the 28th day before Election Day, all drop-boxes should be installed and ready for use. To ensure the boxes are accessible to all voters, drop-boxes shall be designed to function as follows³:

- To prevent physical damage and unauthorized entry, any unstaffed drop-box located outdoors shall be constructed of durable material able to withstand vandalism, removal, and inclement weather.
- Drop-boxes shall have an opening slot that is not large enough to allow ballots to be tampered with or removed.
- Drop-boxes are designed in such a way that any unauthorized access can result in physical

² The boundaries drafted by the ROV are based on estimated population numbers and are meant to serve as guidelines. The number set by VCA should be thought of as serving "up to 15,000" voters; this means that the projected number of voters in each boundary do not always add up to the total amount defined by VCA.

³ See Elections Code §20132

evidence that unauthorized access has taken place. An elections official may use a tamper-evident seal for purposes of this section.

- A drop-box shall provide specific signage identifying where ballots are to be inserted.
- Each drop-box shall be assigned a unique identifying number that is located on the drop-box and shall be easily recognized by the designated ballot retrievers, as well as the public.
- The drop-box shall be clearly and visibly marked, as an “Official Ballot Drop-Box”.
- Drop-box hardware shall be operable without any tight grasping, pinching, or twisting of the wrist.
- Drop-box hardware shall require no more than five (5) pounds of pressure for the voter to operate.
- Drop-boxes shall be operable within reach-range of 15 to 48 inches from the floor or ground for a person utilizing a wheelchair (this shall not apply to a drop-box meant to be used by drivers of vehicles).
- Ballot drop-box signage must be a distinct color type that contrasts with the background and have a “no-glare” finish.
- Drop-boxes must be designed in such a way that the public will perceive them to be official and secure.
- Each ballot drop-box throughout the county, both staffed and unstaffed, must have the same use features, and be of similar design, color scheme, and have signage to facilitate identification by the public.
- Ballot drop-box size is based on the use and needs of Santa Clara County.

Some key things to keep in mind for the Official Ballot Drop-boxes:

- No postage is needed to return ballots in drop-boxes.
- Vote-by-mail ballots will not be accepted after 8:00pm on Election Day.
 - Drop-boxes will be locked at exactly 8:00pm on Election Day.
 - The exception is if voters are already in line to return their ballot when the Vote Center closes or time has been extended by court order.
- Tampering with the Official Ballot Drop-box is a felony⁴.
- A notification shall be placed on each drop-box to advise any Elections Official if the box is full, has been tampered with, or is damaged.
- The boxes shall have ROV office number and a toll-free number to either ROV or SOS to notify if drop-box has been tampered with or damaged⁵.

To ensure voters who primarily speak a language other than English have sufficient access, drop-boxes will be marked “Official Ballot Drop-Box” in all eight languages: Chinese, Spanish, Tagalog, Vietnamese, Khmer, Korean, Hindi, and Japanese.

In addition, each of the Ballot Drop-boxes will have a sign advising the voter that extra ballot return envelopes are available, if needed. The voter is instructed to follow the directions on the envelope, which includes filling out their name, residential address, date of birth, and providing their signature. If using a Ballot Drop-box, ballots must be returned enclosed in an envelope with the voter’s information and signature. A toll-free number will be provided advising the voter to call if they have any questions or need further assistance.

Vote Centers

The Voter’s Choice Act (VCA) will bring about many new and exciting changes. Vote Centers will be open up to 11 days and will be equipped with new and more accessible voting equipment, language assistance, and offer Conditional Voter Registration (CVR) and same day voting. Additionally, voters

⁴ See California Elections Code §18500

⁵ See California Elections Code §20132

will not be limited to one assigned Polling Place, but rather have the option to visit any one of the approximately 110 available Vote Center locations throughout the County of Santa Clara.

Under VCA, Vote Centers are required to be open for more days than previously practiced at traditional Polling Places. Vote Centers must be operated under two early voting periods: (1) Ten days before Election Day, and including Election Day, for a total of 11 days, and (2) three days before Election Day, and including Election Day, for a total of four days. The California Elections Code sets the parameters by which a county must provide Vote Center locations for voters:

- Starting from ten (10) days before Election Day, and including Election Day, for a total of eleven (11) days, one Vote Center per every 50,000 voters must be operated.
- Starting from three (3) days before Election Day, and including Election Day, for a total of four (4) days, one Vote Center per every 10,000 voters must be operated.

To better service voters, Santa Clara County is planning to operate two additional 11-day Vote Centers above the minimum requirement, and eight additional 4-day Vote Centers above the minimum requirement based on the projected number of registered voters by the March 2020 Presidential Primary Election. The ROV created two maps that divide the county into areas with 50,000 voters and 10,000 voters each (see Appendix E). These maps assisted in the process of finding Vote Center locations. The map with boundaries around areas with 50,000 voters was used to locate the 11-day Vote Centers, while the map with boundaries around areas with 10,000 voters was used to locate the 4-day Vote Centers.

Hours of operation for all Vote Centers may vary per facility on the dates prior to Election Day⁶. On Election Day, all Vote Centers will be open to voters from 7:00 am to 8:00 pm, per the Elections Code⁷. To see the list of potential Vote Centers the ROV is considering, see Appendix F. At the time of publication, all Vote Centers under consideration are subject to change.

Boundary Category	Minimum Requirement	Proposed⁸ Number
11-Day Vote Centers (1 for every 50k registered voters)	20	22
4-Day Vote Centers (1 for every 10k registered voters)	80	88

The figures provided in the table are based on the projected number of registered voters. The actual calculation will be determined 88 days before the election pursuant to the Elections Code⁹.

Traditionally, the ROV sees a spike in registration during a Presidential Election year. As of July 2019, approximately 910,000 voters were registered in Santa Clara County. The ROV anticipates that number to climb up to 1 million registered voters before the March 2020 Presidential Primary Election. Voter registration is anticipated to grow even more by the 2020 November Presidential General Election. To ensure consistency between elections, as well as to maintain an adequate number of Vote Center sites, the ROV is recruiting based on an estimated 1.1 million registered voters by the November General Election. This will allow the ROV to potentially keep the same Vote Center locations for both the March and November elections in addition to the unchanging locations creating stability for voters amidst other changes that will come with the implementation of VCA.

⁶ The ROV is still in the process of procuring Vote Centers and all specific locations and hours of operation were not available at the time of publishing.

⁷ See Elections Code §4005

⁸ The boundaries drafted by the ROV are based on estimated population numbers and are meant to serve as guidelines. The number set by VCA should be thought of as serving “up to 50,000” voters; this means that the projected number of voters in each boundary do not always add up to the total amount defined by VCA. The Proposed numbers indicated are the minimum target for recruitment. The ROV will consider additional locations as needed to provide adequate coverage to any areas that may demand more support.

⁹ See Elections Code §12223

No. of Eligible Voters	No. of Registered Voters	No. of Eligible but Unregistered	No. of Projected Registered Voters
1,200,000	910,000	290,000	1,000,000

Voter Registration

Vote Centers will be able to provide many more services than what has previously been provided by the traditional Polling Place Model. One of the expanded services offered at Vote Centers is voter registration. Voters will now have the ability to register to vote, update their voter registration, and vote conditionally at any Vote Center. Voters who are found eligible to vote under Conditional Voter Registration (CVR), will receive a ballot with a CVR envelope.

CVR is a way for members of the community, who are not registered to vote after the 15-day close of registration, to go to a Vote Center to register and vote on the same day. Voters may also use CVR to update their address or political party after the 15-day close of registration. Once the completed CVR ballot is returned to the ROV office, the potential voter will be screened for eligibility. The ballot will only be opened and counted upon verification that the voter meets all eligibility requirements. The CVR envelope will also serve as the voter's Affidavit of Registration and the voter may tear off their receipt from the envelope so they may track the status of their ballot on the ROV's website¹⁰.

Replacement Ballots

Vote Centers will now be able to provide replacement ballots to voters upon request. A voter may request a replacement ballot at any Vote Center upon verification that a ballot for the same election has not been received from the voter by the ROV¹¹. If the ROV cannot determine if a ballot has been received from the voter, the ROV may allow the voter to vote provisionally.

Provisional Voting¹²

At any Vote Center, a voter may vote provisionally. A voter claiming to be registered, but whose registration and eligibility cannot be immediately determined by ROV staff, is entitled to vote a provisional ballot. The ROV must advise the voter of his or her right to do so and provide the voter with:

- A provisional ballot along with written instructions regarding the process and procedures for casting a provisional ballot
- Written affirmation regarding the voter's registration and eligibility to vote, which must be signed by the voter

To vote provisionally, a voter must execute (sign), in the presence of ROV staff, the written affirmation stating the voter is eligible to vote and registered in the County of Santa Clara. The voter must then seal the ballot in a provisional ballot envelope for the return to the ROV's main office.

During the official canvass, staff must verify the voter's address and ensure the signature on the provisional ballot envelope matches the signature on the voter's affidavit of registration or another signature in the voter's registration file. A variation of the signature substituting initials for the first, middle name, or both does not invalidate the ballot. Staff must also verify additional eligibility

¹⁰ Vote-by-Mail Ballot Tracking Website: <https://eservices.sccgov.org/rov?tab=ab>

¹¹ Elections Code §4005

¹² Elections Code §14310

requirements before opening and counting the ballot.

Any voter who casts a provisional ballot may tear off their receipt from the envelope so they may track the status of their ballot on the ROV website¹³. Voters may contact the ROV or use the website¹⁴ to discover whether or not their ballot was counted, and, if not, the reason why it was not counted. It is expected that the number of provisional ballots cast will significantly decrease with the implementation of the new voting system and use of electronic pollbooks.

Accessible Voting in Vote Centers

The Santa Clara County Registrar of Voters (ROV) aims to ensure voter accessibility is considered throughout the planning and implementation of VCA. Accessibility is a major topic of consideration as the ROV contemplates Vote Center selection, voting machines, and the training and placement of Election Officers in order to provide compliance with any and all needs of the voters. The ROV will be using new voting machines, along with previously established programs, such as Remote Accessible Vote-by-Mail (RAVBM) voting, to promote a safe, accessible, and independent voting experience for every voter. The County of Santa Clara has, and will continue to provide, accessible voting at all Vote Centers¹⁵.

The ROV will be using the California Secretary of State's Accessibility Checklist Survey to determine the features of the Vote Center facilities that meet standards, and those that will require modifications. All modifications will be notated into the delivery system and the individual Vote Center booklet with maps, illustrations and photos that will be given to the supervisors in charge of setting up and operating the facility. Modifications are expected to meet Americans with Disabilities Act (ADA)¹⁶ requirements, and may include ADA parking spots, ramps, doors, pathways, and others.

Each Vote Center in the County of Santa Clara will be equipped with at least three (3), but up to six (6), accessible Ballot Marking Devices (BMD). The Dominion Voting System ICX BMD will provide an independent voting experience for some voters with disabilities. The BMDs for each Vote Center will have ADA compliant features and accessories with a variety of voting method options. These units will be programmed with all ballot types and language versions.

Santa Clara County's voting system contains many features that provide for a more accessible voting experience. This system allows for visual, audio, and tactile interfaces that can be used in any voter-preferred combination to navigate and mark a ballot. In regard to visual screen modifications, the size of the font on the screen can be changed and the screen resolution can be switched to a high-contrast white on a black background. In addition to screen modifications, the Audio Tactile Interface (ATI) keypad can be attached. The ATI unit is equipped with a volume-controlled audio voting component that allows voters to listen to their ballot, adjust the pace of speech (if needed), and make their choices. The ATI also has a full range of large buttons for navigation with corresponding brail descriptions and inputs for "Sip and Puff" or paddle selection devices. Voters who are unable to utilize these features independently may bring up to two individuals to assist them throughout the voting process. Additionally, the ROV provides audio tapes of the County Voter Information Guide (CVIG), available upon request.

In the event that one or more of the BMD fail or malfunction, the ROV will promptly initiate procedures to replace any devices as necessary. The replacement process will be prioritized by the locations' available functioning units, capacity needs, and the severity of malfunction. The support operation ratio is one (1) support site with three (3) teams for every six (6) Vote Center groups.

¹³ Vote-by-Mail Ballot Tracking Website: <https://eservices.sccgov.org/rov?tab=ab>

¹⁴ Provisional Ballot Tracking Website: <https://eservices.sccgov.org/rov?tab=pb>

¹⁵ Elections Code §19240

¹⁶ Americans with Disabilities Act website: <https://www.ada.gov/>

Additional accessibility services that will be available at each Vote Center are curbside voting and having greeters who will be trained to assess and direct all voter needs through the Vote Center process.

Language Assistance

The goal of the ROV is for each Vote Center to provide some form of language assistance in all languages required¹⁷. For the County of Santa Clara, these languages will include:

- English
- Chinese
- Spanish
- Tagalog
- Vietnamese
- Khmer
- Korean
- Hindi
- Japanese

Depending on the needs of a specific community, the ROV will attempt to recruit bilingual staff that can speak the languages prominent in any given community. Areas requiring specific language needs will be identified, however, if bilingual staffing is not available, Vote Center staff will contact the ROV and connect the voter to bilingual office staff or to the County's phone translation service.

In conjunction with mapping and language data from the voter database, the ROV is able to target the placement of bilingual staff at locations where they will best serve the community in the most efficient way. Targeting the placement of bilingual Election Officers to Vote Centers located in certain language communities will occur if there are not enough bilingual Election Officers of every language to staff each Vote Center throughout the county.

All voting materials will be available in the four federally mandated languages. Official Ballots, CVR and provisional envelopes, and all Vote Center signage will include the four federally mandated languages, the two state mandated languages of Khmer and Korean, as well as the inclusion of Japanese and Hindi, which are not required but have been historically provided by the County.

When a specific bilingual worker is not available, Vote Center staff can call the ROV office and talk to one of our bilingual staff. In addition, we can also meet any language request we receive through the County's phone translation service.

All voting information will be available in the four federally mandated languages both in printed media as well as electronically (laptop containing the County Voter Information Guide (CVIG), as used at the June and November 2018 Early Vote Centers). Signs will be posted at all Vote Centers noting the availability of language assistance.

¹⁷ Elections Code §12303

Vote Center Placement Consideration

The ROV used the same 14 criteria mandated by the Secretary of State as outlined in the **Ballot Drop-off Locations** section. Data collected from several available sources (e.g. American Community Survey, ROV Voter Database, VTA bus stops) were used to quantify some of these criteria. These criteria include public transportation, traffic patterns, population centers, language minorities, disability, low vehicle ownership, low income, low vote by mail usage and low voter registration (see Appendix G for the data maps used to target potential Vote Centers and Ballot Drop-off Locations).

A siting tool called “DOTS” was developed to help the ROV determine the optimum locations for Vote Centers. The model divided the county into 0.5-mile grids. Each grid was rated a score from one to five for each criterion listed above. Each individual score was added to get a total score at the end. The potential Vote Center and Ballot Drop-Box Locations were then overlaid on top of the score map. The locations that fell into, or near, high score grids were given preference because they met more of the criteria.

Input from the public was also taken into consideration in this process. The most important considerations from the public feedback received included proximity to population centers, traffic patterns, language minority communities, voters with disabilities, and public transit. The ROV added additional importance to proximity to communities with historically low voter registration and Vote-by-Mail usage, as these communities will be able to make the best use of the services provided by a Vote Center, such as Conditional Voter Registration or voting in person. The criteria chosen by the public and ROV Staff were given higher weights in the siting tool development process. Other criteria, such as availability, price, size, shape of room, and access to parking were evaluated on a case by case scenario.

The ROV has worked to ensure adequate coverage in high density areas, historically low voter turnout areas, and areas with underserved communities. In addition, Vote Center boundaries were established to help limit the distance and time a voter must travel to a Vote Center. In lieu of mobile Vote Centers, the ROV plans to have additional Vote Centers above the minimum requirement and place them closer to each other throughout these areas in order to better serve the local community. Upon examining the communities outside of major metropolitan areas, the south-eastern region of Santa Clara County was identified as a community that could benefit from additional Vote Centers.

Composition of Election Officers

The ROV will hire Election Officers (referred to by the Elections Code as Election Boards¹⁸) to staff Vote Centers. Election Officers will be from as many diverse communities as possible to maximize the skills needed to process voters¹⁹. Vote Center staff should exhibit experience in customer service, bilingual ability, sensitivity to diversity and inclusion, leadership qualities, technological capabilities, and interest in the civic duty of community participation. They will be trained on new Vote Center technology, how to process voters, and crowd control management. Additional customer service training topics will include accessibility for seniors and voters with disabilities, inclusivity, and proper communication. The ROV will select the best candidates based on eligibility and the needs of the community. Past Election Officers will also be informed of the new volunteering possibilities and may be recruited if they meet the new staffing needs commitment.

The composition of Election Officers will be a combination of Extra Help County employees and

¹⁸ Elections Code §4005

¹⁹ Elections Code, Division 12, Article 1 of Chapter 4

stipend volunteers. Leads and clerks will be hired as hourly county workers and greeters will mostly be stipend workers (e.g. previous Election Officers, High School students). All Vote Center staff will be trained per role and will work anywhere between one day (stipend workers) to multiple days, if not, all election days. ROV Outreach events will include recruitment for Election staff where they can fill out an application on the spot that will be submitted to the County for approval.

Staffing for Vote Centers will be based on Vote Center size and the proximity to Election Day. The plan is to have six (6) to fifteen (15) Election Officers at each Vote Center. More staff will be deployed to the larger Vote Centers and during busier times and days as Election Day approaches. There will be an effort to recruit as many bilingual Election Officers as possible in order to support the County's language needs.

Electronic Pollbooks (E-Pollbooks)

In order to effectively implement the changes under VCA, Vote Centers will be updated with E-Pollbooks²⁰. An E-Pollbook is the combination of electronic hardware and software used to ensure secure electronic communication between Vote Centers and the ROV Election Information Management System (EIMS). The ROV EIMS then communicates information to VoteCal. VoteCal is the centralized statewide voter registration database that interacts and exchanges information with county election management systems and other state systems such as Department of Corrections and Rehabilitation, Department of Public Health, and the Department of Motor Vehicles. This new VCA technology will operate on either a laptop or tablet, but will be "*HARDENED*"; meaning, only the ROV approved E-Pollbook software will be operable on the device.

E-Pollbooks contain an electronic list of registered voters (Roster Index) that may be transported and used at Vote Centers. The Roster Index is the official list of all registered voters eligible to vote in the election. It is primarily used to verify a voter's eligibility to receive a ballot and capture voter history in near real-time to prevent double voting.

Under the new VCA model, E-Pollbooks will be maintained in a secure locked waterproof case and be placed inside a secondary secured locked cage with strict lock and key access assigned to personnel for daily storage. During operating hours, the data stored in these units are updated continuously. E-Pollbooks are programmed with user access allowing only authorized users to log in using a secured connection to a secured cloud server. This cloud server maintains the database and connection to the ROV's Election Information Management System for transmission of any updates to voter data. More information about the security of voter data in E-Pollbooks can be found in the **Voting Security** section in **Part 2: Voter Education and Outreach Plan**.

E-Pollbooks may be used to verify voter registration data, including name, address, date of birth, preferred language, party preference, precinct, and vote-by-mail status. Furthermore, E-Pollbooks never store the following voter information: driver's license number, or any reference to a social security number. E-Pollbooks provide near real-time searching and voter status information; essentially, creating a better voting experience for both voters and ROV Election Officers.

Outreach

Public Consultations

- In an effort to have inclusive participation in the Election Administration Plan (EAP) process, the County of Santa Clara held twelve (12) public consultation meetings as follows: Two (2) meetings with the general public:

²⁰ Elections Code §2183

General June 12, 2019 2:00-3:30pm	Santa Clara County Social Services Room 116	379 Tomkins Ct. Gilroy, CA 95020
General July 13, 2019 1:00-2:30pm	Registrar of Voters Auditorium	1555 Berger Dr., Bldg 2 San Jose, CA 95112

- Two (2) meetings with the public with accessibility concerns:

Accessibility June 13, 2019 5:00-7:00pm	County Government Center Room 157	70 W. Hedding St. San Jose, CA 95110
Accessibility July 10, 2019 11:00am-12:30pm	Silicon Valley Independent Living Center Board Room	25 N. 14 th St. Suite 1000 San Jose, CA 95112

- Eight (8) meetings with the public from the county's targeted language communities with language accessibility concerns:

Vietnamese June 17, 2019 6:30-8:00pm	Tully San Jose Branch Library Community Room	880 Tully Rd. San Jose, CA 95111
Khmer June 18, 2019 5:30-7:00pm	County Government Center Room 157	70 W. Hedding St. San Jose, CA 95110
Tagalog June 21, 2019 4:30-6:00pm	Milpitas Library Auditorium	160 N. Main St. Milpitas, CA 95035
Spanish June 24, 2019 4:00-5:30pm	Mayfair Community Center Lincoln Room	2039 Kammerer Ave. San Jose, CA 95116
Chinese June 25, 2019 5:30-7:00pm	Quinlan Community Center Social Room	10185 N. Stelling Rd. Cupertino, CA 95014
Korean June 27, 2019 2:00-3:30pm	Registrar of Voters Auditorium	1555 Berger Dr., Building 2 San Jose, CA 95112
Hindi July 8, 2019 7:30-9:00pm	Indian Community Center Gita & Ashok Vaish Room	525 Los Coches St. Milpitas, CA 95035
Japanese July 11, 2019 4:30-6:00pm	Joyce Ellington Branch Library Community Room	491 E. Empire St. San Jose, CA 95112

The schedule and public notices for the EAP meetings were posted on the website at least 10 days before each meeting. Public notices were also posted outside the Santa Clara County Government Center at 70 W. Hedding Street, San Jose, CA 95110. Additionally, the ROV used Nextdoor, Facebook, Twitter, and Instagram to advertise the meetings. Appendix H includes all the notices for the meetings related to the development of the EAP.

In the EAP meetings, the targeted topics were:

- Potential Vote Center locations
- Potential Ballot Drop-off Locations
- Various language accessibility needs
- Various voter accessibility needs
- Suggestions for community outreach through media and events

Among the materials provided at the meeting were a Vote Center recruitment flyer and a site selection survey (shown in Appendix I) to help gather information and suggestions for potential Vote Centers. All the input from the meetings were documented in the meeting minutes (Appendix J).

Election Administration Plan (EAP) Development Timeline²¹

Publish proposed draft of EAP	August 16, 2019
14-day public comment period on draft EAP	August 16, 2019 to August 30, 2019
Issue 10-day public notice of hearing to consider draft EAP	August 20, 2019
First Public Hearing to consider draft EAP	August 30, 2019 5:30-7:30pm 70 W. Hedding Street San Jose, CA 95110 Board of Supervisors' Chambers
Second Public Hearing to consider draft EAP	September 4, 2019 6-8pm 70 W. Hedding Street San Jose, CA 95110 Board of Supervisors' Chambers
Period to amend the draft EAP after public hearing	August 30, 2019 to September 18, 2019
Publish amended EAP in all languages	October 11, 2019
14-day public comment period on amended EAP	October 11, 2019 to October 25, 2019
Adopt and publish final EAP	November 15, 2019
Education and outreach portion of EAP sent to Secretary of State for Approval	November 15, 2019

Public Notices

Through two direct mailers, the public will be notified that all voters will be receiving a vote-by-mail ballot. The notices will inform voters that an all-mailed ballot election will be conducted, and that voters can cast their ballot one of three ways: by mail (postage paid), at any Ballot Drop-off Location, or at any Vote Center in the county. The notices will also include a link to where voters can access the dates, locations, and hours that Vote Centers and Ballot Drop-off Locations will be open, as well as the deadline for requesting a vote-by-mail ballot in an accessible format or in one of the eight languages offered, other than English. Additional information provided in the direct mailers include:

²¹ The timeline is an estimation and subject to change.

content regarding residency confirmation and voter information verification, business reply mail, important Vote Center information, County and State Voter Information Guide details, and instructions on updating name and/or party affiliation. The notices will also provide voters with a link to the ROV website, phone numbers, and the toll-free hotline to request assistance at (866) 430-VOTE.

The first set of direct mailers will be mailed approximately 90 days before the election (E-90) followed by the next set to be mailed approximately 29 days before the election (E-29).

In addition to the two direct mailers required by the Elections Code, the ROV is also preparing a third mailer for voters who register late and do not receive a County Voter Information Guide. This set of direct mailers will be mailed approximately 15 to 10 days before the election. All public notices and information related to VCA will be posted on the ROV website in an accessible format.

Language Accessibility and Voting Accessibility Advisory Committees

The Santa Clara County Registrar of Voters (ROV) has established two advisory committees through the coordinated process of internal process development, stakeholder and public input and through feedback from counties that have adopted the Voter's Choice Act (VCA). The first committee is the Language Accessibility Advisory Committee (LAAC) which will seek input from the minority language communities on ways the Vote Center Model could better serve voters who primarily speak a language other than English. The second committee is the Voting Accessibility Advisory Committee (VAAC) which will seek input from voters with accessibility concerns, such as seniors or voters with disabilities, to ensure that their voting needs and concerns are addressed.

Membership for these committees will be engaged through the networking and collaboration of various contacts ranging from non-profits and community-based organizations to municipalities within Santa Clara County. The first meetings of both the LAAC and VAAC were used to establish the committees and determine the goals of each committee. The date, time, and locations of the first few meetings of each committee are below:

Language Accessibility Advisory Committee (LAAC)		
Date	Location	Time
June 5, 2019	Sobrato Center for Nonprofits 1400 Parkmoor Ave., San Jose, CA 95126	3:00 – 5:00pm
June 19, 2019	Sobrato Center for Nonprofits 1400 Parkmoor Ave., San Jose, CA 95126	3:00 – 5:00pm
July 17, 2019	Sobrato Center for Nonprofits 1400 Parkmoor Ave., San Jose, CA 95126	2:00 – 4:00pm

Voting Accessibility Advisory Committee (VAAC)		
Date	Location	Time
June 7, 2019	ROV Auditorium 1555 Berger Dr. Bldg. 2, San Jose, CA 95112	3:00 – 5:00pm
June 18, 2019	ROV Auditorium 1555 Berger Dr. Bldg. 2, San Jose, CA 95112	3:00 – 5:00pm
July 16, 2019	Silicon Valley Independent Living Center Board Room 25 N. 14 th St., Suite 1000, San Jose, CA 95112	10:00am – 12:00pm

A list of all the LAAC and VAAC meetings will be posted and maintained on the ROV website at www.sccvote.org/voterschoice. The LAAC meeting agendas and minutes can be seen in Appendix K and the VAAC meeting agendas and minutes is in Appendix L.

Part 2 – Voter Education and Outreach Plan

The Voter's Choice Act (VCA) mandates any county implementing VCA also implement a voter education and outreach plan that informs voters about the provisions of VCA. More specifically, the law also mandates targeted outreach to voters who primarily speak a language other than English, as well as voters with disabilities, to educate communities on the services available.

The Santa Clara County Registrar of Voters (ROV) has an existing outreach team and program, and often attends several events throughout the year to maintain community presence, as well as to provide voter registration services and general voter education. This Voter Education and Outreach section of the EAP outlines how the ROV will leverage their existing outreach methods and combine it with new ways to reach out to the communities in order to educate the public about VCA. Outreach activities will be designed with the goal of increasing community partnerships, expanding civic engagement opportunities, and improving voter experience with the Vote Center Model.

Section 1: Voter Contact – General

In addition to the events that the ROV has attended and conducted outreach in the past, further voter education and outreach is planned to cover as many of the county's demographics as possible. There are plans to reach out to communities that have historically underserved populations.

Some of the communities that the ROV plans to reach out to include senior communities, ethnic/language communities, youth communities, student communities, underserved communities, and neighborhood groups. The ROV also plans on engaging with over 100 community-based organizations (CBOs) to learn about the work they provide to their communities and how the ROV's outreach team can take part. The goal is to work together with the CBOs and all communities to ensure a successful voter education program.

Use of Media

ROV will provide information about the Vote Center Model, the vote-by-mail process, early voting options, and opportunities to work at a Vote Center in a media campaign starting in late summer or early fall 2019. The campaign represents a significant investment in the effort to educate the public on the upcoming change in the election model and amounts to the largest advertising undertaking in ROV history. Media outlets include, but are not limited to, the following:

1. Local television and community cable stations
 - a. Comcast
 - b. Univision
 - c. Telemundo
 - d. Namaste TV
 - e. Crossing TV
2. Newspapers (regional and community)
 - a. The Mercury News
 - b. Metro
 - c. Morgan Hill Times
 - d. Gilroy Dispatch
 - e. El Observador
 - f. Epoch Times
 - g. India West
 - h. Korea Times
 - i. Nichi Bei Weekly
 - j. Philippine News
 - k. San Jose State Spartan Daily
 - l. Santa Clara University Newspaper

- m. Stanford Daily
 - n. Viet Nam Daily
 - o. World Journal
 - p. N & R
 - q. China Press
 - r. JWeekly
 - s. Spotlight
 - t. Bayspo Magazine
 - u. Daily Post
 - v. India Current
3. Radio
 - a. KBAY/KEZR
 - b. KFOX
 - c. KRTY/KLIV
 - d. Sound of Hope
 - e. Sing Tao
 - f. Univision
 - g. Vien Thao
 - h. Celina Rodriguez
 - i. China Press
 - j. Radio Zindagi
 4. Use of social media and websites for ROV and County
 - a. ROV Facebook page: <https://www.facebook.com/sccvote>
 - b. County Facebook page: <https://www.facebook.com/county.of.santa.clara>
 - c. ROV Twitter: <https://twitter.com/sccvote>
 - d. County Twitter: <https://twitter.com/SCCgov>
 - e. ROV Instagram: www.instagram.com/sccvote
 - f. Nextdoor app: (search for Communication and Media Santa Clara County)
 - g. County newsletter subscription lists
 5. ROV YouTube: <https://www.youtube.com/sccvote>
 6. Public transit messaging on Valley Transportation Authority buses
 7. Advertisements through major league sports franchises located in Santa Clara County
 8. Television monitor ads at Department of Motor Vehicles branch offices
 9. Materials sharing with such groups as community partners, disability advocate organizations, elected officials, special districts, school districts, community-based organizations, and faith-based organizations throughout the county
 10. Public Service Announcements (PSAs) will be used to supplement and complement the advertising campaign on available outlets. These PSAs will cover topics including general information about VCA, language-specific information about VCA and the toll-free language assistance hotline and accessibility options at Vote Centers and via Remote Accessible Vote-by-Mail.

ROV will also use audio and visual media that will be broadly distributed in accessible formats to inform voters of the upcoming election. The goal is to reach all county voters, including voters with disabilities such as those who are deaf or hard of hearing, and voters who are blind or visually impaired.

Community Presence Plan and Voter Education Materials

The ROV continuously participates in hundreds of community events throughout the year. To inform voters of the change in how elections are conducted, VCA information is being added to the various outreach events. The ROV is also actively working with CBOs on how to best inform their communities of the new voting model. Instructional materials and staff are being made available to

facilitate voter education.

Presentations have already been made to organizations that knew about the upcoming Vote Center Model and wanted to learn more, such as the following:

- League of Women Voters Cupertino-Sunnyvale
- League of Women Voters Mountain View-Los Altos
- Democratic 21st Century Club
- Office of Women's Policy
- South County Democratic Club
- Almaden Valley Community Association
- Santa Clara County Office of Education
- API Justice Coalition
- Women's Equality 2020 Leadership Council
- Silicon Valley Community Foundation (SVCF) and Silicon Valley Council of Nonprofits(SVCN) Community Engagement Luncheon
- Orchard City Indivisible
- Girls Achieving in Non-traditional Subjects
- CalWORKs Employment Services Office

A VCA kick-off meeting was held and more than thirty CBOs attended who were potentially interested in assisting the ROV in various ways. The ROV's goal is to train all CBOs who are interested in helping the ROV educate the County on the Vote Center Model.

Other community engagements are currently in the planning process as of this writing. In the meantime, the ROV is continuing to develop public materials, such as Vote Center recruitment flyers and VCA presentations, to be distributed to all organizations and individuals interested in educating their own communities. More details about the community outreach plan can be found in Appendix M.

Direct Mailers

The ROV will contact each registered voter in Santa Clara County in two (2) separate mailings to inform voters of the upcoming election and promote the toll-free voter assistance hotline, (866) 430-VOTE. The mailings will provide information to voters on the new election model, the upcoming election, where they can find more information about these changes, and a link to where voters can access the dates, locations, and hours that Vote Centers and Ballot Drop-off Locations will be open. Additional information provided in the direct mailers will include content regarding residency confirmation and voter information verification, business reply mail, important Vote Center information, County and State Voter Information Guide details, and instructions on updating name and/or party affiliation. A third mailer will be for voters who register late and will not be receiving a County Voter Information Guide. One of the three mailers will include a residency panel allowing voters to update specific information on their voter record. Each mailer will be translated into eight languages to be distributed to registered voters who primarily speak a language other than English.

Voter Education Resources on ROV Website

All ROV's outreach voter education materials including Voter's Choice Act information are and will be available in electronic format on the ROV's website. Before the March 2020 Presidential Primary Election, the ROV website will have the following information:

- General Information about VCA
- Vote Center and Ballot Drop-Box Locations and Hours
- ROV toll-free voter assistance hotline
- EAP Document
- VCA promotional materials

- VCA educational videos and presentations
- Outreach and Workshop Schedules
- VCA-related maps
- Availability of in-person language assistance at each Vote Center

Section 2: Voter Contact – Language Minority Communities

The Registrar of Voters (ROV) established a Language Accessibility Advisory Committee (LAAC) on June 5, 2019 to seek input from minority language communities on ways the Vote Center Model could better serve voters who primarily speak a language other than English. This committee will provide feedback on various aspects such as Vote Center locations, as well as any features and services that will be, or should be, provided. This committee will remain in place through the 2020 election cycles as an ongoing means to hear from the community.

Identifying Language Minority Communities

Language minority communities can be identified based on the preferred language requests from registered voters in Santa Clara County. Using this information, in conjunction with census information and other publicly available demographic information, the ROV has created a map of predominant language areas. Outreach will be geared towards targeting these locations as part of the planned voter education and outreach. The ROV is also seeking input from the various language minority communities to identify other methods of outreach and community events that may be useful to attend.

Language Minority Communities to be Served

The ROV provides services in nine (9) languages, including English. Five languages are federally mandated: English, Chinese, Spanish, Tagalog, and Vietnamese. Two languages are state-mandated: Khmer and Korean. The remaining two languages, Hindi and Japanese, have historically been provided by the ROV due to the large presence of these communities in the County. Official Ballots, Conditional Voter Registration and Provisional Ballot Envelopes, and all Vote Center and ballot drop-box signage will be provided in all nine languages. County Voter Information Guides (CVIGs) will be available only in the federally mandated languages as previously practiced. In addition, bilingual Vote Center staff may be available to support other languages and dialects spoken within the county, such as Cantonese, Farsi, Gujarati, Nepali, Portuguese, Punjabi, Russian, Syriac, Tamil, Telugu, and Thai. Based on mapping and targeting specific language communities, the ROV will aim to place appropriate language support in the form of bilingual Election Officers in the various communities. Upon finalizing Vote Center staffing, the ROV will post information on the ROV website regarding the availability of in-person language assistance at each Vote Center.

The practice of attempting to support as many languages as possible has been used in recent elections, therefore the ROV will reach out to former Election Officers, in addition to practicing traditional recruitment in these language communities.

Voter Education Workshop for Language Minority Communities

The ROV will provide bilingual voter education workshops in the nine (9) languages previously mentioned. These workshops will provide an opportunity for language communities in Santa Clara County to receive information about the Vote Center Model process, in addition to materials and assistance available in each specified language. The ROV will use input from the Language Accessibility Advisory Committee (LAAC) members to select the workshop venues and dates and all workshops will have language specific interpreters to support attendees. As of this writing, the ROV is

planning to conduct bilingual voter education workshops with Korean American Community Services beginning October 2019 and is currently in the process of planning workshops with Chinese, Spanish, Tagalog, Vietnamese, Hindi, Khmer, and Japanese language communities.

Use of Media Targeting Language Minority Communities

The various language minorities will be provided with information about the Vote Center Model and Vote-by-Mail voting, as well as given the Office of the Registrar of Voters' toll-free hotline (866) 430-VOTE, and (408) 299-VOTE for general voter information. Numerous language-specific media outlets will be leveraged, with all federally mandated languages represented. Media outlets include, but are not limited to, the following.

1. Local television and community cable stations
 - a. Univision (Spanish)
 - b. Epoch Times (Chinese)
 - c. Telemundo (Spanish)
 - d. Namaste (Hindi)
 - e. Crossing TV (English + all 8 additional)
2. Newspapers (regional and community)
 - a. El Observador (Spanish)
 - b. Epoch Times (Chinese)
 - c. India West (English)
 - d. Korea Times (Korean)
 - e. Nichi Bei Weekly (Japanese)
 - f. Philippine News (Tagalog)
 - g. Viet Nam Daily (Vietnamese)
 - h. World Journal (Chinese)
 - i. N & R (English)
 - j. China Press (Chinese)
 - k. JWeekly (Japanese)
 - l. Spotlight (English)
 - m. Bayspo Magazine (Japanese)
 - n. Daily Post (English)
 - o. India Currents (Hindi)
3. Radio
 - a. Univision (Spanish)
 - b. Celina Rodriguez (Spanish)
 - c. Sound of Hope (Chinese)
 - d. Sing Tao (Chinese)
 - e. Vien Thao (Vietnamese)
 - f. China Press (Chinese)
 - g. Radio Zindagi (Hindi)
 - h. Korean American Radio
4. Social Media and Department's website
 - a. ROV Facebook page: <https://www.facebook.com/sccvote>
 - b. County Facebook page: <https://www.facebook.com/county.of.santa.clara>
 - c. ROV Twitter: <https://twitter.com/sccvote>
 - d. County Twitter: <https://twitter.com/SCCgov>
 - e. ROV Instagram: www.instagram.com/sccvote
 - f. Nextdoor app: (search for Communication and Media Santa Clara County)
 - g. County newsfeed subscription lists
 - h. ROV Youtube: <https://www.youtube.com/sccvote>
 - i. ROV website: <https://www.sccvote.org>

5. Language minority community newsletters
6. Public Service Announcements (PSAs) will be used to inform voters in minority language communities of the upcoming election and of the toll-free assistance hotline. The PSAs will be translated in all federal and state mandated languages and distributed through minority language television, radio, newspapers and online sources.

Other opportunities for reaching out to language minority communities include providing bilingual staff during media information sessions, such as a planned open house where the ROV will demonstrate the new voting system that will be placed in Vote Centers.

Election Officers

To determine the composition of Vote Center staff, the ROV will hire Election Officers (referred to by the Elections Code as Election Boards)²². Staffing for Vote Centers will be based both on the proximity to Election Day and Vote Center size. The plan is to have six (6) to fifteen (15) Election Officers staff each Vote Center. More staff will be deployed to the larger Vote Centers and during busier times as Election Day approaches. From 10 days before Election Day until 4 days before Election Day, Vote Centers will have a minimum of 6 staff members. From 3 days before Election Day until 1 day before Election Day, Vote Centers will have a minimum of 11 staff members. On Election Day, there will be a minimum of 15 staff members in each Vote Center.

There is also a plan to have at least one Election Officer per language, or at the very least, one Election Officer per the most common languages in that Vote Center's area. The ROV will hire Vote Center staff from diverse communities, as much as possible, to maximize the skills needed to process voters, while also being certified to act as a translator for voters as well. Recruitment will begin with contacting previous bilingual Election Officers, as well as the typical open-recruitment application process.

Section 3: Voter Contact – Voters with Disabilities

The Registrar of Voters (ROV) established a Voting Accessibility Advisory Committee (VAAC) on June 7, 2019 to seek input from voters with accessibility concerns, such as seniors or voters with disabilities, on ways the new election model can best serve them. This committee will provide feedback on various aspects such as Vote Center locations, as well as any features and services that will be, or should be, provided. This committee will remain in place through the 2020 election cycles as an ongoing means to hear from, and work with, the community.

Methods Used to Identify the Needs of Voters with Disabilities

The ROV is constantly improving upon how the needs of voters with disabilities are being addressed. In order to do so, the ROV analyzes recommendations regarding voters with disabilities from four (4) primary sources: (1) citizens with disabilities, (2) CBOs that provide supportive services to voters with disabilities, (3) other Counties implementing VCA, and (4) the Secretary of State's office. With VCA turning a completely new chapter to the way voting is conducted, the ROV is also taking this opportunity to begin a new phase in developing relationships with voters who have disabilities (and the CBOs that support them).

Disability Rights California and Silicon Valley Independent Living Center are two organizations that directly reached out to ROV regarding the needs of voters with disabilities. From that initial engagement, the ROV has continued to foster relationships with the following organizations:

²² Elections Code, Division 12, Article 1 of Chapter 4

- Vista Center for the Blind and the Visually Impaired
- State Council on Developmental Disabilities – Central Coast Office
- Handicapables
- Santa Clara Valley Blind Center
- San Andreas Regional Center

This new phase emphasizes the importance of input directly from voters with disabilities. The ROV is committed/open to reviewing/exploring all recommendations coming directly from the voters.

Outreach to the Disability Community

In addition to the general media campaign, the ROV will also focus on providing information to voters with accessibility needs. This will include information about the availability of a minimum of three accessible voting devices at every Vote Center, as well as the option to request the use of the Remote Accessible Vote-by-Mail (RAVBM) system. The RAVBM system is designated for use only by registered voters with disabilities, as well as for military and overseas voters²³.

Other opportunities for information dissemination include:

1. Organizations that provide services and support to seniors or have disabilities, such as Silicon Valley Independent Living Center, Silicon Valley Council of the Blind, Santa Clara Valley Blind Center Incorporated, and Greater Opportunities, among others
2. Community partners, cities, special districts, school districts, faith-based organizations, and Public Information Officers throughout the county
3. Accessibility options highlighted at an “Open House” public demonstration and any media opportunities to experience a mock Vote Center
4. Radio and television Public Service Announcements highlighting accessibility option at Vote Centers
5. Public Service Announcements will be used to highlight the accessibility options at Vote Centers, as well as the availability of the Remote Accessible Vote-by-Mail system.

Services for Voters with Disabilities

All Vote Centers will comply with the Americans with Disabilities Act (ADA). When necessary, other available doors and entry ways will be made available to ensure proper access for all voters. In addition, depending on size, Vote Centers will be equipped with three to six voting devices, also known as Ballot Marking Devices (BMD), that have ADA compliant features to allow voters with disabilities to cast a ballot with independence and privacy. For those voters who would rather vote in the comfort of their home, they will also have the option to apply for and access the RAVBM system. With RAVBM, voters will be sent an email with a link to download their Official Ballot, along with instructions on how to print, complete, and return their ballot to the ROV. Voters with disabilities can also seek help via ROV’s toll-free hotline at (866) 430-VOTE, in addition to (408) 299-VOTE for general voter information. Either line provides language assistance.

Voter Education Workshop for Disability Community

The ROV will hold voter education workshops to provide information about the available accessibility options and the Vote Center process to the elderly and voters with disabilities. The workshops will include, but not be limited to, education about the Vote Center Model, new voting equipment demonstrations, accessibility of voting equipment, ballot drop-box information, and options for obtaining an accessible Vote-by-Mail ballot electronically. The ROV will use input from the Voting Accessibility Advisory Committee (VAAC) members to select workshop venues and dates. Recently, the ROV has conducted a workshop with Vista Center for the Blind and Visually Impaired and as of

²³ See California Elections Code §303.3

this writing, is currently in the process of planning workshops with Silicon Valley Independent Living Center, San Andreas Regional Center, and State Council on Developmental Disabilities.

Draft Materials Used in Educating Voters with Disabilities

The ROV is creating audio, visual, and written materials that will be used to disseminate information; and information gathered from VAAC meetings will be used throughout the development of these materials. These materials will also be made available as resources on the ROV website.

For any videos used for VCA promotion or education, closed captioning is made available. Examples include the VCA promotional video posted on the ROV website and the EAP Public Hearings that were streamed online (and uploaded). Additionally, the ROV is working to transcribe the VCA informational flyer into braille.

Election Officers

To prepare for the 2020 Primary Election, the ROV is developing training materials specifically for Election Officers. Certain training materials will focus on the cultural sensitivity aspect of engaging voters with disabilities. Other training materials will help Election Officers with the technical aspect of operating and connecting various listening and/or visual assistive devices that voters with disabilities may bring with them and require to use at Vote Centers. A diversity video is provided in the training for Election Officers to understand how to respectfully provide services to all individuals with and without disabilities. Other training includes properly setting up a Vote Center for voters with disabilities. All Election Officers take an oath to be responsive and respectful to the uniqueness of each voter as a commitment to the diversity of all voters. Election Officers promise to make all voters feel welcomed, respected, and valued.

Section 4: Vote Center and Ballot Drop-off Location Information

Vote Center Locations

The California Elections Code requires counties to have Vote Centers open for two early voting periods. The first early voting period requires Vote Centers to be open ten (10) days before Election Day, and including Election Day, for a total of eleven (11) days. This calculation is based on having one Vote Center for every 50,000 registered county voters. The second early voting period requires Vote Centers to be open three (3) days before Election Day, and including Election Day, for a total of four (4) days. This calculation is based on having one Vote Center for every 10,000 registered county voters.

The Registrar of Voters (ROV) is currently in the process of securing approximately twenty-two (22) Vote Centers to be open for eleven (11) days and eighty-eight (88) Vote Centers to be open for four (4) days for a total of one hundred ten (110) Vote Center locations. Some of the Vote Center hours may be staggered to cater to individuals with irregular schedules or could be due to the availability of the individual locations. At the time of publication, a number of locations have confirmed their availability, but the selection of Vote Center locations will be finalized once the analysis of public input and ROV priorities is complete. Based on the projected number of registered voters by the March 2020 Presidential Primary Elections, the ROV would be required to have at least 100 Vote Centers for the 2020 Presidential Primary and General Elections. To better serve the needs of the County, the ROV is proposing to have approximately 110 Vote Centers, ten more Vote Centers than required by VCA. The breakdown of Vote Centers is as follows:

Estimated Number of Vote Centers			
Boundary Category	Minimum Requirement²⁴	Proposed Number²⁵	Number Finalized²⁶
11-Day Vote Centers (1 for every 50k registered voters)	20	22	TBD
4-Day Vote Centers (1 for every 10k registered voters)	80	88	TBD
Total	100	110	TBD

Appendix E has the maps showing the 50,000 and 10,000-voter boundaries used to help identify potential Vote Center locations. For the current list and map of proposed Vote Center locations and hours, see Appendix F.

Ballot Drop-off Locations

The Registrar of Voters (ROV) plans to operate 91 total Ballot Drop-off Locations. Based on the projected number of registered voters by the March 2020 Presidential Primary Elections, the ROV would be required to have at least 67 Ballot Drop-off Locations for the 2020 Presidential Primary and General Elections. To better serve the needs of the county, the proposed number is based on having at least one drop-off location in every district in the County. For the current list and map of proposed Ballot Drop-off Locations, see Appendix D.

Estimated Number of Ballot Drop-off Locations			
Boundary Category	Minimum Requirement	Proposed²⁷ Number	Number Finalized
Ballot Drop-off Locations (1 for every 15k registered voters)	67	91	TBD

Preventive Measures

The ROV will have the following preventive security measures in place, prior to and during the election, to prevent a disruption in the voting process:

²⁴ The minimum required number of Vote Centers is based on the projected number of voters in Santa Clara County by the March 2020 Primary Election.

²⁵ The boundaries drafted by the ROV are based on the estimated number of registered voters and are meant to serve as guidelines. The number set by VCA should be thought of as serving "up to 50,000" voters; this means that the projected number of voters in each boundary do not always add up to the total amount defined by VCA.

²⁶ This number reflects the number finalized by the time of publication.

²⁷ The boundaries drafted by the ROV are based on estimated population numbers and are meant to serve as guidelines. The number set by VCA should be thought of as serving "up to 15,000" voters; this means that the projected number of voters in each boundary do not always add up to the total amount defined by VCA.

<u>Preventive Security Measure</u>	<u>Purpose</u>
Standard Security Measures	To limit access to election-related materials & equipment and ultimately prevent any potential disruptions.
Server and Network Backup	To prevent a disruption of information flow should the main server or network go down.
Backup Set of Polling Site Equipment	To prevent a disruption in the voting process should any equipment become unusable.
Backup Equipment	To prevent a disruption in the voting process should any equipment go missing.
Backup Voting Supplies	To prevent a disruption in the voting process should any Voting Supplies become unusable or go missing.
Vote Center Employees on Standby	To prevent a disruption in the voting process should Vote Center Employees be absent.
Suspicious Person or Object Procedures	To prevent a disruption in the voting process should a suspicious person or object appear.
Manual Systems in Place	To prevent a disruption in the voting process should electronic voting equipment become unusable.

For a detailed breakdown of each of the preventive security measures above, please see Appendix N.

Contingency Plan

The ROV will take every measure possible to ensure a smooth election process, however, in case a disruption does occur, the ROV has specific measures in place to continue doing business in the event of a disruption. The ROV has identified several key potential disruptions:

- Election Information Management System outage
- Power outage
- Inclement weather
- Fire or other disaster
- Voting equipment malfunction
- Ballot on Demand machine stops working
- Internet connection failure
- Vote Center employees do not show up
- Unusable Vote Center

For a breakdown of these disruptions, ROV's solutions, and additional ROV contingency measures, see Appendix O.

Section 5: Vote Center Ballot Security and Privacy Plans

Vote Center Design and Layout

The ideal Vote Center would be at least 60'x60' to ensure optimum flow while providing ample space for designated private voting areas. There will be a designated queue system to direct voters to the appropriate staff, a sign-in table to process voters on the new electronic pollbook, the Ballot on Demand printer area where ballots will be printed, and voting booths and Ballot Marking Device areas. Appendix P shows the general layout design which will be used as a guide, but each Vote Center will likely have a customized layout.

Voting Security

All necessary steps are being undertaken to ensure the confidentiality, integrity, and security of voter data. All County voter data is stored in databases and servers using security measures that are designed to protect the data while keeping it available for use by County staff.

At the main Registrar of Voter's (ROV) office, the voting system will be air-gapped, meaning it will have no access to the outside network. The only access to the voting system is by physically entering the server room which houses the system. In regard to computer security, if there is no time to safely shut down desktop computers, staff should lock the computer by using Ctrl+Alt+Delete. The reason for this is simply pushing the power button once may not be enough to break connection and shut it down completely. If there is no power, staff should wait for direction from the Help Desk about the best way to handle the computers.

At Vote Centers, staff will have access to near real-time information of registration data and voter history for all voters as they come to any of the Vote Centers. Any voter data that will be made available at Vote Centers and will be transmitted between the Vote Centers and the County data servers will be encrypted using the latest encryption technologies. Only specific election devices and equipment at Vote Centers will be allowed access to voter data and the data will be encrypted in transit and while at rest. Regular data backups will be performed, as well as detailed audit trails of user interaction and processes to help ensure transparency and security.

Ballots completed at Vote Centers will be scanned and tallied on-site using ballot tallying machines that are not connected to any network. The ballot data will be encrypted and saved in a cartridge that will only be accessible by physically removing it from the machine. The cartridges from each of the ballot tallying machines will be transported back to the ROV main office for recording after the close of voting at 8:00 pm on Election Day.

Vote-by-mail (VBM) ballots received are collected at the ROV main office and stored in a secured ballot room until counted. Before the ballots can be counted, the signatures on the VBM ballot envelopes are verified to ensure that each ballot is from a registered voter. After the signatures have been verified, the ballots are extracted and sorted into precincts and submitted for counting. After being counted, the ballots will then be stored, by precinct, in a separate secure location.

If an emergency occurs that requires staff to remove ballots from the building, staff shall tape the boxes, or bins and move them to the new location. If they cannot be removed from the building, ballots will be placed in one of the secured rooms. Blank, unissued ballots should be left behind if there is no time to remove them. If there is time, the ROV or designee will advise staff on what to do with blank, unissued ballots.

Section 6 – Budget

The Registrar of Voters (ROV) has drafted a budget and plan for necessary resources to cast a wide net to inform voters about the Vote Center Model voting process. For the last two election cycles under the Polling Place Model, Santa Clara County spent an average of about \$163,000 for voter education and outreach, including advertising. The ROV spent about \$186,000 for the June 2018 election, while approximately \$140,000 was spent for the November 2018 election. More was spent for the June election because in January of that year, all necessary materials were purchased for the whole year. Any additional materials for the November election were purchased as needed. Additionally, outreach for the June election has a larger outreach period than from June through November for the November election. Appendix Q provides the outreach events breakdown for the June 2018 and November 2018 elections.

With the implementation of Voters Choice Act (VCA), the budget for outreach and advertising grew to almost \$3 million for the March 2020 Presidential Primary Election to support the effort to educate the public about their new voting options. The projected budget does not include staffing and other costs

associated with outreach. The breakdown for the VCA budget and the comparison with the last two elections are shown in the table below:

ACTIVITY	JUN 2018 ACTUAL COSTS (POLLING PLACE MODEL)	NOV 2018 ACTUAL COSTS (POLLING PLACE MODEL)	MAR 2020 BUDGET (VOTE CENTER MODEL)
Advertising Total	\$165,521	\$114,754	\$1,048,900
Newspaper Ads/Radio Spots/Social Media/Print Ads	\$165,521	\$114,754	\$418,900
New Radio Spots			\$210,000
Sports Franchises			\$420,000
Outreach Total	\$20,478	\$25,359	\$1,837,015
Outreach Supplies and Displays	\$3,758	\$3,281	\$97,547
Outreach giveaways (swag) at events	\$11,611	\$12,436	\$162,513
Outreach giveaways for CBO distribution			\$120,180
Outreach equipment			\$20,550
County Printshop/Printed materials	\$5,109	\$9,643	\$100,000
Vehicle Rentals and Fuel			\$16,225
2 direct mailings to each registered voter			\$1,320,000

There is currently no estimated projected short-term savings and the estimate of the projected long-terms savings is unknown at this time.