

# Sacramento County Election Administration Plan Comments to Review

<b>Date Received:</b> 2018-01-22 14:32:15	<b>Comment:</b> I am pleased to see the proposal is in the various languages most widely spoken in Sacramento. I wish that for events like on public comment, your meetings had a Facebook event. I didn't quite find out about the meetings you were holding for LAAC until the very last one and I had a schedule conflict by then. All in all, please ensure you reach out to linguistic minority groups. How could I be part of the board? Thank you.
<b>Organization:</b> Laguardia Translations	
<b>Date Received:</b> 2018-01-25 13:56:00	<b>Comment:</b> Section 1A More detail is needed about how blind and deaf voters will be reached, such as through ASL PSAs, braille signs, etc. Section 2B "County Voter Information Guide" should also state it will include information about requesting a remote accessible vote by mail ballot. Currently it just states information will be provided on using remote accessible vote by mail ballot. Language should be modified thus: Detailed instructions for obtaining and using the .... In addition, there is still no information about by when an accessible remote accessible vote by mail ballot request should be received by the County Elections Department. Section 1D It is our understanding at least one of the vote centers will not be fully accessible. How does that reconcile with your assertion in the EAP that vote centers will be located in fully accessible facilities as required by Election Code section (a)(4)(C and D)? Section 2F This section is not detailed enough. The VCA in §4005(a)(10)(i)(vi)(X) states that the described services for voter with disabilities are not limited to just voting equipment and modifications. You should include a more detailed description of vote center worker training. Further, this section needs a description about how workers will be trained. Appendix F Thank you for including the currently know vote centers and your assurances that they will be updated weekly.
<b>Organization:</b> Disability Rights California	
<b>Date Received:</b> 2018-01-26 16:51:28	<b>Comment:</b> January 26, 2018 Sacramento County Voter Registration and Elections Sent via comment boxes on Sac County Elections website Re: Additional DRC comments on Voter's Choice Act Election Administration Plan Dear Sacramento Elections Office, We would like to submit additional comments on the amended draft Elections Administration Plan (EAP). We previously sent comments on January 25th. The amended draft plan, like the first draft plan, is missing an important requirement. The voter education and outreach plan is required to include a description of how county election officials will educate and communicate the provisions of the Voter's Choice Act to the disability community. Similar to the requirement that the county elections office provide details of their community outreach plan regarding the language minority communities in their EAP's Education and Outreach Plan, the VCA requires that the EAP contains: (i) A voter education and outreach plan that is approved by the Secretary of State and that includes all of the following: (VI) A description of how the county elections official will educate and communicate the provisions of this section to the public, including... (ib) The disability community, including organizations and individuals that advocate on behalf of, or provide services to, individuals with disabilities. The county elections official shall hold at least one voter education workshop to increase accessibility and participation of eligible voters with disabilities. Elections Code Sec 4005(a)(10)(i)(VI)(ib) The amended draft EAP does not contain a community outreach plan for voters with disabilities other than the required voting workshop. Section 1-K is the only section relating to voters with disabilities in the education and outreach plan that talks about the voter education workshop. Unlike with language minority communities in section 1-F, there is no mention about media, social media, public service announcements, billboards, or working with community partners. Please note that Sec 4005(a)(10)(i)(VI)(ib) requires a description of the communication plan and not just the workshop for the disability community. The amended draft plan needs include a section comparable to 1-F for the disability community that discusses media, materials, and public outreach plans. Sincerely, Fred Nisen Supervising Attorney for Voting Rights Disability Rights California
<b>Organization:</b> Disability Rights California	
<b>Date Received:</b> 2018-01-27 23:37:50	<b>Comment:</b> It's racist. It discourages minorities who often vote in a group. It makes it very difficult to receive a ballot in a timely fashion for voters who register near the deadline. It disadvantages younger or more transient voters who may change addresses frequently. There is no way to confirm my ballot is ever counted. It encourages voters to make up their minds weeks in advance, which heavily favors incumbents. i There is no drop off site for MILES from where I live. MILES. The only way I would ever feel comfortable with remote voting is if it was possible to be emailed my ballot or pick one up in person. I would also require that voters be able to scan their ballots through a QR code or other secure means on a mobile vote or other device. I would also want same day registration available.
<b>Organization:</b>	



January 27, 2018

Jill LaVine, Registrar of Voters  
Sacramento County Voter Registration and Elections  
7000 65<sup>th</sup> Street, Suite A  
Sacramento, CA 95823

Dear Ms. LaVine,

We write as a coalition of local organizations committed to seeing the Voter's Choice Act (VCA) successfully implemented in Sacramento County, such that voter participation increases, particularly among underrepresented communities. Thank you for the opportunity to comment on Sacramento County's Amended Election Administration Plan (EAP). We were pleased to see that your office appears to have secured additional funding in the county's revised budget for advertising and voter education and outreach. This is a positive development, and we look forward to seeing more details about the plans for that funding.

We have attached our previous letter, as most of our comments were not addressed in the amended plan, and we continue to believe Sacramento's EAP would benefit as a more transparent and useful document if our suggestions are incorporated.

We also again make the request that your office extend the comment period for the EAP at least another week, so as to ensure community members have had an opportunity to review and comment. By releasing the amended EAP on a Saturday during a three-day weekend and not notifying your advocate email list, your VCA email list, or the Sacramento Voter's Choice Coalition, we are concerned that a number of individuals and organizations that are committed to successful VCA implementation may not have had time to review the amended EAP or provide public comment. We appreciate that your office did eventually agree to email interested organizations on January 22<sup>nd</sup>. We thus request extending the comment period to two weeks from that date, on February 5<sup>th</sup>.

The following are some suggestions we wish to highlight from our previous letter. We look forward to discussing these suggestions with you and your staff.

### **Section 1-C: Use of Resources for Voter Education and Outreach**

Appendix J shows the "estimated funding for the VCA advertising and voter outreach requirements" at \$187,812 for advertising and \$701,434 for voter outreach. The specificity of these figures suggest the VRE office has a more detailed breakdown. We understand that the plans for voter outreach is subject to change and that you will need to be responsive to conditions as they arise, but we continue to believe the EAP should include a more detailed breakout of how

you anticipate spending this money. For examples of the level of detail we seek, please see Nevada and Napa Counties' EAPs. Their plans break down anticipated costs for labor, VBM printing, other printing, postage, outreach (further breaking out outreach into sub-categories), equipment, and site rentals.<sup>1</sup>

Now that the county has allocated additional funding in its revised budget, and the Secretary of State's office has made an additional \$98,000 available to your office, we again request that the EAP provide more information to the public on how it intends to spend public money on advertising and education and outreach. We also request that the budget explain how spending on advertising, education and outreach will be divided for the June election and November elections, so the public can understand when the additional funding is coming and when it will be spent.

## **2-H: Ballot Drop Boxes**

We continue to have questions and concerns about the plan for drop boxes. The EAP currently identifies 28 of its projected 52 drop off locations as libraries. While libraries have advantages as drop off locations, including being places we believe voters trust and are comfortable in, they also present a challenge because of their hours. We believe the EAP would benefit from a discussion about how the county will address this challenge, including:

- Ten of libraries will not be open until noon or 1 pm on Election Day.
- None of the libraries will be open until 10 am on Election Day,
- Ten of the libraries are scheduled to close at 6 pm on Election Day.
- Only one library is open on Monday, the day before the election.
- Only two libraries will be open the Sunday before the election.

We urge you to address these issues in the EAP, including considering:

- Working out an agreement with the libraries to extend their hours and remain open in the four days prior to and including Election Day.
- Going above the minimum number of drop off locations, as a way to supplement the limited access at libraries.
- Re-consider the decision to only have only one exterior, 24-hour drop off location.
- Paying for postage for voters to return their vote-by-mail ballots as voters transition to this new system.

## **Language Access**

The Secretary of State's office recently determined that Sacramento County must recruit bilingual poll workers, and translate facsimile ballots into two new languages: Punjabi and Hmong. The Secretary of State also determined that Sacramento no longer was required to

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<sup>1</sup> For Napa County, see Appendix VIII: <http://ca-napacounty.civicplus.com/DocumentCenter/View/6908>  
For Nevada County, see Appendix K: <http://elections.cdn.sos.ca.gov/vca/nevada-draft-plan.pdf>

provide services in Japanese. We urge you to acknowledge this new responsibility in the plan, including how your office will outreach to the communities now covered, and ensure that voters who speak Japanese are informed they will no longer have access to services they have come to expect. We also continue to urge you to consider providing services in languages that may not be covered, but where there are significant needs, including Russian.

We appreciate our partnership with you and your office and look forward to continuing to collaborate with you on implementing the VCA in Sacramento. Please do not hesitate to contact us with questions.

Sincerely,

Raul Macias  
ACLU of California

Nicolas Heidorn  
California Common Cause

Theresa Riviera  
Cruz Reynoso Voter Project

Chris Chaffee  
Emerging Latino Leadership Foundation

Cha Vang  
Hmong Innovating Politics

Paula Lee  
League of Women Voters of Sacramento County

Tamie Dramer  
Organize Sacramento

*Encl:* Draft EAP Comments, December 27, 2017

*CC*

Supervisor Don Nottoli, Chair  
Supervisor Susan Peters, Vice Chair  
Supervisor Phil Serna  
Supervisor Patrick Kennedy  
Supervisor Sue Frost  
James Schwab, Secretary of State's office

# Previously received Sacramento County Election Administration Plan Comments to Review

<b>Date Received:</b> 2017-12-05 20:57:45	<b>Comment:</b> Hi there, I was looking at the map and wondering if there will be a voting place on ARC's campus? Thanks!
<b>Organization:</b> ARC Progressive Democrats	
<b>Date Received:</b> 2017-12-06 09:23:47	<b>Comment:</b> Please put a voting place on my campus. It would make it easier for students to vote.
<b>Organization:</b> American river college	
<b>Date Received:</b> 2017-12-14 20:16:40	<b>Comment:</b> Make the voting process more accessible and keep ARC a voting site.
<b>Organization:</b>	
<b>Date Received:</b> 2017-12-14 20:19:06	<b>Comment:</b> GO VOTE
<b>Organization:</b>	
<b>Date Received:</b> 2017-12-14 21:04:42	<b>Comment:</b> We need a vote center on ARC campus.
<b>Organization:</b>	
<b>Date Received:</b> 2017-12-14 23:14:58	<b>Comment:</b> ARC students want a vote center on the ARC campus so it easier for us to vote!!
<b>Organization:</b>	
<b>Date Received:</b> 2017-12-15 12:38:04	<b>Comment:</b> I attend American River College and believe that having a voting place on campus would make it easy and comfortable for other students and I to participate in voting. I never know where polls are and it discourages me from getting out on voting day. If I could vote at ARC it would benefit me greatly. I also believe it would encourage many young people to vote when they might not otherwise.
<b>Organization:</b>	
<b>Date Received:</b> 2017-12-18 18:05:21	<b>Comment:</b> Please host a voting center on the Sacramento State campus! We need a central location for all students to come and vote outside of the residence halls. I and the student government at Sac State would be happy to support these efforts!
<b>Organization:</b> N/A	
<b>Date Received:</b> 2018-01-02	<b>Comment:</b> 1. Signature w/ any "x", since the signatures can vary what happens w/ the "x" is not matching the voter registration form 2. Budget information not clear as to the expenses and out reach plan 3. Signature not matching the voter registration form 4. Explanation of provisional ballot and conditional ballot
<b>Organization:</b> Justice Cruz Reynoso Voter Project	



Submitted via Email

To: Sacramento County Registrar of Voters,  
c/o Alice Jarboe, Assistant Registrar of Voters, JarboeA@sacounty.net  
From: Kim Alexander, President, California Voter Foundation  
Date: January 3, 2018  
Re: Feedback on Sacramento County's draft Election Administration Plan

Thank you for the opportunity to comment on the county's draft Election Administration Plan (EAP), which has been prepared in anticipation of Sacramento's implementation of the new California Voters Choice Act (VCA). The California Voter Foundation's (CVF) comments are below and were provided during oral testimony at a public hearing conducted at the Registrar of Voters' office on December 12, 2017.

## **1) The document requires better editing and proofreading.**

Overall, there are numerous typos, problems with punctuation, missing words, inconsistencies and other errors in the draft EAP. For example, the abbreviation "VRE" is used as shorthand for the "Voter Registration and Elections" department. But the term "department" is also used as shorthand. It should be consistent throughout the document. Before it is updated again and certainly before it is translated again into six additional languages, CVF recommends that someone with good editing skills first review it.

## **2) The EAP should provide the public with a full picture of the changes the county will implement to facilitate the Voters Choice Act.**

We understand that the EAP is not intended to be a summary of all of the county's election procedures. But many longstanding election procedures will change under the VCA model. These procedures should be written out and available to the public upon request. CVF also suggests that you include reference to these written procedures in the EAP so that the reader understands a fuller picture of the overall election process.

Below is a list of new procedures that CVF requests be available to the public in writing upon request prior to the June 2018 Primary election:

- The process for checking voters in to vote centers;
- The equipment choices voters will have at vote centers and what voters need to do to if they want to be sure they do not spoil their own votes on contests by overvoting (it is our understanding that in-precinct scanners, which served this function in Sacramento polling places for the past 10 years, will no longer be available at vote centers);

- How voters who arrive at vote centers without their vote-by-mail ballots will be processed;
- Whether voters will have the right to fill out their vote-by-mail ballots at home and deposit their voted ballots into a vote center ballot box without putting their ballot inside an envelope bearing their signature for verification; and
- How the technology used for connecting to the county election management system deployed in vote centers will be secured and what the backup plan will be for lost connections.

**3) The EAP should describe the county's general outreach strategy to inform and educate all county voters about the coming voting changes (Page 1, Section 1).**

We understand that this plan includes details about the activities that are required by the VCA to be described in an implementing county's Election Administration Plan. Although these requirements do not explicitly say a county must describe its general outreach strategy to voters, we think Sacramento's EAP should include some description of how the county will conduct media outreach to all voters generally, not just those with disabilities or needing language access. Moving to the vote center model represents a huge shift in the way our county votes and for hundreds of thousands of people it will be the first time they will be encouraged to vote by mail. The county must plan for a robust media outreach campaign and messaging to all Sacramentans, not just subsets of our population.

You may wish to consider adding some description about this outreach in section 1-C on page 3, "Use of Resources for Voter Education and Outreach".

**4) Provide a reference for how "geographic communities" communities will be determined.**

The draft EAP says "VRE will make every effort to reach all areas of the County including cities and geographic communities, as well as communities of interest" (Page 2, Section 1-B).

It is our understanding that the elections department is utilizing the county's 25 "Community Boundaries with Incorporated Areas" map to help determine vote center locations and is committed to locating at least one of the 78 vote centers in each of these designated geographic communities. We recommend including this commitment to utilize this and a link to the county's Community Boundaries map in the EAP. The map is online at:

[http://www.per.saccounty.net/Documents/Maps/Community%20Boundaries\\_0211.pdf](http://www.per.saccounty.net/Documents/Maps/Community%20Boundaries_0211.pdf)

**5) Spell out acronyms.**

Many organizations' acronyms are included in the draft EAP, especially on Page 3. We recommend that the EAP spell out the full name of organizations listed in it and only use acronyms after the full name has been provided.

## 6) Remove “on-line” from description of how to obtain replacement ballots through the Remote Accessible Vote-by-Mail system

On page 7, in the “Ballot Access, 2-B” section, the draft plan says any voter may request a replacement ballot in a number of ways, one of which is “through the on-line RAVBM system”. We did not realize this was being planned and are concerned about how this will be managed in a secure way? We are also concerned with describing the RAVBM system as “on-line” since it may lead some to believe it is a form of online voting. If this replacement ballot method is going to be available, you could simply say “through the RAVBM system”.

## 7) Clarify that only certified equipment will be used in vote centers.

On page 7, the draft plan says:

“All voting conducted at Vote Centers follows the Secretary of State's security standards, VRE's security procedures, and regulations in the California Elections Code and the California Voting System Use Procedures. This includes, but is not limited to ensuring all equipment at the Vote Center is sealed, stored, delivered and used in compliance with these regulations.”

We recommend you add the word “certified” so that the last sentence in this paragraph instead reads:

“This includes, but is not limited to ensuring all equipment at the Vote Center is sealed, stored, delivered, **certified**, and used in compliance with these regulations.”

## 8) Edit and clarify the “Security and Contingency plan” section on Page 8.

This is an important section of the plan that requires some editing and clarification. CVF’s suggested edits are in bold below:

“Under California voting system requirements, all certified equipment must run on battery power in the event of a power outage. All locations will have a cell phone. Emergency responders will receive a list of all Vote Center locations. Each Vote Center will be provided with emergency procedures and be provided with an instruction manual for the operation of a Vote Center and processing voters **during an emergency**.”

“VRE immediately works to resolve the disruption at a **polling voting** site, and each disruption will have its own response.”

“If there is a natural disaster or other disturbance **occurs** that affects a Vote Center or ballot drop-off site’s physical location, additional notifications, signage...”



“VRE will attempt to open a replacement Vote Center and extensively ~~notice~~ **publicize** the change.”

**9) Clarify the reference to 772,782 registered voters on Page 9.**

The EAP refers to 772,782 registered voters as a “high point” and we are not sure what this means. If this is a record high number of registered voters for Sacramento County, that should be clearly stated.

**10) Clarify how voters will be informed of drop box locations.**

On page 10, the EAP says, a list of drop box locations and hours will be included in election materials provided to voters” but does not saw how this will be provided. The EAP should clearly state that this list will be mailed to all registered voters.

**11) Provide a timeline for submitting data to the Secretary of State regarding rejected ballots and commit to publishing this information on the county’s web site.**

Page 11, 2-K states that the county will provide election statistics to the Secretary of State. Specifically, the VCA requires that:

4005 (g) (1) (A) Within six months of each election conducted pursuant to this section or Section 4007, the Secretary of State shall report to the Legislature, to the extent possible, all of the following information by categories of race, ethnicity, language preference, age, gender, disability, permanent vote by mail status, historical polling place voters, political party affiliation, and language minorities as it relates to the languages required under subdivision (c) of Section 14201 and Section 203 of the federal Voting Rights Act of 1965 (52 U.S.C. Sec. 10101 et seq.):

- (i) Voter turnout.
- (ii) Voter registration.
- (iii) Ballot rejection rates.
- (iv) Reasons for ballot rejection.
- (v) Provisional ballot use.
- (vi) Accessible vote by mail ballot use.
- (vii) The number of votes cast at each vote center.
- (viii) The number of ballots returned at ballot dropoff locations.
- (ix) The number of ballots returned by mail.
- (x) The number of persons who registered to vote at a vote center.
- (xi) Instances of voter fraud.
- (xii) Any other problems that became known to the county elections official or the Secretary of State during the election or canvass.

We request that the EAP include a timeline for providing this information to the Secretary of State and also that it state that this information will be posted on the County of Sacramento's election web site. Given that another election will be held under the VCA model just five months after the first one, it will be crucial for election officials and advocates to review data from how the first election went and determine ways to remedy problems and unintended consequences before the November 6, 2018 General Election. We suggest this data be compiled and published no later than eight weeks after the June 5 Primary, which would be July 31.

**12) Add a provision stating the county will contact voters who forgot to sign their vote-by-mail ballot envelope and provide them with an opportunity to submit a valid signature so their ballot can be counted.**

Section 4006 of the VCA requires implementing counties to conduct outreach to voters who fail to sign their ballot envelopes. Sacramento County already voluntarily implemented this outreach program in 2016, resulting in 1,273 voters' ballots being "cured" and counted after voters supplied their missing signatures. It is CVF's view that this outreach program should be referenced in the EAP to give the public assurance that voters will not be disenfranchised if they forget to sign their ballot envelopes. This section could be added to the "Additional Considerations" section of the EAP starting on Page 10.

**13) Provide realistic numbers for the estimated cost savings.**

We strongly object to the inflated numbers provided in Appendix J, comparing the costs to the county for a polling place model to a vote center model. In the last election, there were 550 polling places. To project that in the near future there will be 800 polling places is not reasonable and greatly inflates the cost numbers for the polling place model. Also, it appears the costs featured in this section are not comprehensive and many costs for the vote center model have been left out of this budget analysis.

Overall, we found the budget number provided in the EAP appendix to be not very helpful, as they do not provide details for specific budget categories such as staff, printing and postage costs.

**14) Modify the Security Plan in Appendix K to ensure vote center workers are instructed on using text messaging.**

While it is a good step to ensure that cell phone are available to vote center employees in case of an emergency, it would also be wise to ensure that employees are instructed how to use their cell phones to send text messages. During emergencies, voice functions on cell phones often do not work because the network becomes overloaded; however, text messages which use different technology often do make it to their recipients during an emergency. The election office will need to have a cell phone or way to receive text messages from employees as well.

**15) Reduce the number of appendices and clarify their purpose.**

The EAP includes numerous appendices, making it a very large and unwieldy document overall. Simply having a roster of the LAAC and VAAC members and a list of all the meetings held with links to where minutes and agendas are available online would suffice and make the overall document more accessible.

In addition, if the intention of the appendices is for them to be more flexible and easier to amend than the EAP itself, then their function should be clearly stated at the beginning of the EAP.



**LEGISLATION & PUBLIC  
INFORMATION UNIT**

1831 K Street  
Sacramento, CA 95811-4114  
Tel: (916) 504-5800  
TTY: (800) 719-5798  
Toll Free: (800) 776-5746  
Fax: (916) 504-5807  
[www.disabilityrightsca.org](http://www.disabilityrightsca.org)

December 26, 2017

Sacramento County Voter Registration and Elections

Sent via email to: James Schwab [JSchwab@sos.ca.gov](mailto:JSchwab@sos.ca.gov); Courtney Bailey [baileyc@saccounty.net](mailto:baileyc@saccounty.net); Alice Jarboe [JarboeA@saccounty.net](mailto:JarboeA@saccounty.net); Jill Levine [LavineJ@saccounty.net](mailto:LavineJ@saccounty.net)

Re: Voter's Choice Act Election Administration Plan

Dear Sacramento Elections Office,

Disability Rights California (DRC) appreciates the opportunity to comment on the Sacramento County's draft Election Administration Plan (EAP). DRC is the protection and advocacy system for California. Under the Help America Vote Act of 2002 (HAVA), DRC is charged with ensuring "the full participation in the electoral process for individuals with disabilities, including registering to vote, casting a vote and accessing polling places." See 42 U.S.C. § 15461.

We appreciate the time and effort put into developing the EAP. Generally, we thought there should be more detail included in the Voter Education and Outreach Plan.

**Section 1A**

The required media outreach to the disability community is not a separate section; rather it is included with general requirements in 1A. We recommend that the disability outreach be pulled out of the general section into a stand-alone detailed section similar to Section 1F for the language minority outreach plan. Additionally, more detail is needed about how blind and deaf voters will be reached, such as through ASL PSAs, braille signs, etc.

This section needs better information about how a voter can obtain a remote accessible ballot. The VCA in §4005(a)(10)(I)(i)(II) requires a detailed “description” of how the county will use different media formats to inform voters about remote accessible ballots. Section 2B, to which this section refers, is not detailed enough. It should include information about how voters will be informed about remote accessible ballots, such as through the sample ballots and on-line, and by when the request needs to be made.

### **Section 1E**

Preferred term is accessible format rather than alternative format.

### **Section 2B**

Remote accessible ballots are not on-line. This language should be changed. On-line ballots are not secure. Remote accessible ballots will be downloaded on a person’s personal computer so they can use their own assistive technology with a password or other identifying information. Thus, the ballot will not be on-line.

### **Section 2F**

This section only describes the available accessible equipment and planned physical modifications at vote centers. It should include information about vote center worker training. Properly trained and knowledgeable workers are critical to making voting at vote centers accessible.

The VCA in §4005(a)(10)(I)(vi)(X) states that the described services for voter with disabilities are not limited to just voting equipment and modifications. You should include a description of vote center worker training, which includes information on working with voters with disabilities and operating and troubleshooting the accessible equipment. Further, this section needs a description about how workers will be trained.

### **Section 2J -- Budget**

We are concerned that Appendix J states it will cost nearly \$800,000, but the budget is only \$72,000. How will the County resolve this? This issue needs to be explained and addressed.

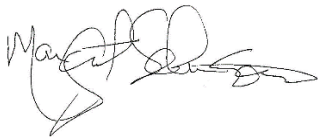
### **Appendix F**

Vote center locations should have been included in the EAP. Without vote center locations, it is difficult to properly assess proximity to voters with disabilities and public transportation. The elections office was supposed to

include vote center locations “to the extent available at the time of publication.” At this point, it seems reasonable to expect more locations would have been confirmed.

In an effort to make the best of the situation, we urge that locations be added to the EAP, as they become known. Even though at recent meetings, we were told there were three confirmed locations, they do not appear in the EAP. Without listing vote center locations, the public cannot comment on them or provide information about their usefulness. The County can continually update the vote center locations in the appendix. Updating the appendix is not the same as updating the EAP and does not create translation logistic issues.

Very truly yours,

A handwritten signature in black ink, appearing to read "Margaret Johnson". The signature is fluid and cursive, with a large initial "M" and "J".

Margaret Johnson, Esq.  
Disability Rights California



December 27, 2017

Jill LaVine, Registrar of Voters  
Sacramento County Voter Registration and Elections  
7000 65<sup>th</sup> Street, Suite A  
Sacramento, CA 95823

*Sent via email*

Dear Ms. LaVine,

We write as a coalition of local organizations committed to seeing the Voter's Choice Act (VCA) successfully implemented in Sacramento County, such that voter participation increases, particularly among underrepresented communities. First, congratulation the completion of Sacramento County's draft Election Administration Plan (EAP). This is a huge step in the implementation of the Voter's Choice Act in Sacramento. We appreciate the hard work and collaboration that the Voter Registration and Elections (VRE) office put into drafting this important plan.

The following are some suggestions for making the EAP a more transparent and useful tool for the public. We look forward to discussing these suggestions with you and the VRE staff.

### **Introduction - Specify When a Voter Education Commitment Is Aspirational**

On page 1, the EAP states "many of the actions listed in this Plan are future-looking, and are listed as a framework for what may be accomplished." We are unclear if this means that voter outreach commitments listed in the EAP beyond what SB 450 requires are merely aspirational and hope the VRE office can clarify this point in the EAP.

### **Section 1-A: Media for Access to Ballots and Public Service Announcements (PSA) for Election Notice**

- Consider including more specifics so the public has a sense of the television, radio, and newspapers that will be partnered with. We request that the EAP list all the media outlets (radio, TV, electronic, print) the VRE will be contacting regarding the VCA, similar to what has been done in other county EAPs. We recommend that the county create a chart in the appendix where all media outlets the county plans to reach out to are listed, by name, type, and language served. An example is provided below. This will help identify which communities are potentially being reached, and enable advocates, including the Sacramento VCC Hub, to suggest other outlets that may have been missed, particularly serving language minority communities.
- To the extent available, please include information on the reach of different outlets, for example the circulation of a particular newspaper. If information is available about the demographics, or regions that a television channel, radio station, or newspaper reaches,

Raúl Macías – [rmacias@acluca.org](mailto:rmacias@acluca.org) • Tami Dramer – [organizesacramento@gmail.com](mailto:organizesacramento@gmail.com) •  
Chris Chaffee – [cchaffee@gmail.com](mailto:cchaffee@gmail.com) • Nicolas Heidorn – [NHeidorn@commoncause.org](mailto:NHeidorn@commoncause.org) •  
Paula Lee – [paula.lee@comcast.net](mailto:paula.lee@comcast.net)

include this information. It can help the public assess whether there are populations that are missing.

Name	Type	Language	Audience Size (if known)	Audience Served (Demographics, Region, etc)
Sacramento Bee	Newspaper	English	130,000	General
KGRB Radio Lazer 94.3	Radio	Spanish	?	Latino

- The EAP states that PSA information “will include the option to use an accessible voting device at any Vote Center, and how to use the device; and, the method for requesting, marking and submitting an accessible ballot.” This is valuable ballot access information and we support its inclusion. However, we think the EAP also needs to specify that the VRE will provide general PSAs explaining to voters their different voting options under the new model.
- While it may be too soon to know the precise amounts that will be spent on the different types of media, consider including the overall budget for advertising. This will help the public understand what resources are available when they make recommendations.
- At past meetings the VRE office has said that the social media accounts are managed by the county rather than the VRE office. The VRE office has also indicated that they have already developed some messaging. Include information about the partnership with the county, messaging, and more detail on the social media plan that has been developed so that the public has an opportunity to provide feedback.
- Please list the community partners, disability advocate organizations, community based organizations, and faith-based organizations that the VRE office will partner with.

**Section 1-B: Community Presence to Educate Voters on the Voter’s Choice Act**

- The listing of the community events that the VRE plans to attend is very useful. The Sacramento VCC Hub plans to ask coalition members for additional suggestions of community events, which we will provide to the VRE. For example, there are typically Martin Luther King Jr. Day events that the county or a county partner should attend.
- In addition to listing specific community events that the VRE will attend, the EAP should include the number of community events the VRE is planning to attend per week or per month, to give a better sense of the scope of this outreach.
- The EAP should similarly specify the number of presentations the VRE anticipates giving.



- The EAP should also be more specific about who the county plans to partner with, to the extent the information is available, for example by listing neighborhood associations and faith-based communities.
- We recommend that, in the EAP, the VRE also plan to present to, and seek the assistance of:
  - National Voter Registration Act (NVRA) Agencies -- such as the DMV, Covered Sacramento, IHSS, and the county Department of Health and Social Services – who may particularly help with educating low-income and harder-to-reach eligible voters;
  - Labor organizations – since they represent a significant proportion of voters and, like the county central committees, are active in mobilizing voters; and
  - Candidates running in the 2018 election.

### **Section 1-C: Use of Resources for Voter Education and Outreach**

Appendix J shows the “estimated funding for the VCA advertising and voter outreach requirements” at \$187,812 for advertising and \$701,434 for voter outreach. The specificity of these figures suggest the VRE office has a more detailed breakdown. Understanding that exactly how the county spends money on voter outreach is subject to change and will need to be responsive to conditions as they arise, the EAP should include a more detailed breakout of how it anticipates spending this money. For example, Nevada and Napa Counties’ EAPs breaks down anticipated costs for labor, VBM printing, other printing, postage, outreach (further breaking out outreach into sub-categories), equipment, and site rentals. The EAP should also explain how much of this funding the VRE office has on hand versus how much would need to come from a later supplemental appropriation from the Board of Supervisors.

### **Section 1-D: Direct Contacts with Voters Providing Information on the Upcoming Election and Promoting the Toll-Free Voter Assistance Hotline**

The EAP explains the County will contact each voter twice, as required by statute, but does not indicate how that contact will be made (e.g. by mail, not including the sample ballot). We request that the EAP include how those two contacts will be made.

### **Section 1-E: Postage-Paid Postcard for Requesting Materials in an Alternate Language or an Accessible Format VBM**

Please explain if each postcard will include instructions in all federal and state required languages. We also recommend giving the LAAC and VAAC opportunities to review the postcard.

### **Section 1-F: Inform Voters of the Upcoming Election and Promote the Toll-Free Voter Assistance Hotline with Media Serving Language Minority Communities**

- Please include the budget for paid media in television, newspapers, and radio.

- To the extent available, include information on the circulation, and demographics of the media outlets the VRE is planning on using, as well as which language groups each publication is being used to target. This will help the public identify areas of need.
- Please list community based organizations and faith-based organization and other partners the VRE office is planning to partner with. This will help the public identify areas of need.
- Does the VRE office currently use social media in all federal and state covered languages? If so, please list those accounts. If not, it would be helpful to share the plan to create those accounts and create a following for those accounts. This is an important area for outreach and more detail would be helpful to understand how the county plans to use social media to get information out to voters.
- Please share examples of how the PSA will be distributed so that the public can identify areas of need.
- Consider working with LAAC on translations and messaging on materials and advertising.

### **Section 1-G: Identifying Non-English Speakers**

Consider using robocalls to identify non-English speakers to send them language-appropriate ballot materials.

### **Section 1-H: Voter Education Workshop for Minority Language Voters**

Sacramento County includes many large, non-English-speaking populations that the county will likely not be legally required to send translated materials to. The EAP should discuss how the County plans to reach out to these communities, including, for example, the Russian, Punjabi, and Hmong populations.

### **Section 1-J: Website has Publicly Available Accessible Information**

- Please explain how the VRE verifies that its website is accessible.
- We recommend increasing the font size on the website to help voters with visibility impairments.
- Consider adding a page that explains accessibility features. For example, see Disability Rights California’s website, which features a link at the top of the page that leads to a page with accessibility information (<http://www.disabilityrightsca.org/access.htm>).

### **Section 2-B: Access to a VBM Ballot by Voters with Disabilities**

We recommend not using the shorthand “online ballot” to refer to RAVBM, as it suggests online voting and may promote fears of vote hacking.

## **Section 2-D: Vote Centers**

- The EAP should indicate how often the appendix with vote center and drop-off site locations will be updated as well as an anticipated timeline and deadlines for selecting final site locations.
- We appreciate that the EAP lists the number of vote centers and drop-off sites as minimums; we strongly encourage the county to base siting decisions on need and not treat the minimum number of sites as maximums.
- We strongly recommend the county consider creating a mobile vote center which could be taken to remote communities or prominent community events. Please include a discussion on the need for mobile vote centers.
- Please include a discussion on the use of non-permanent vote centers.

## **2-H: Ballot Drop Boxes**

- The list of drop boxes should be updated as sites are confirmed, not as they are established.
- Many of the drop box locations will not be open until noon on Election Day, and will not be open on the two days before the election, when interest in the election is at its highest. This another reason to go above the minimum number of drop box locations.
- The county should strongly consider installing additional exterior, 24-hour drop boxes located in convenient areas of the county.

## **Appendix E:**

It would be helpful to include more information on how the maps are used and the definitions of the “priority A-M” in the combined maps. For example, did the county weight all of the factors equally? If so, it would be helpful to understand why the county considers all the factors to be equally important. If not, it would be helpful to show the weighting of the different factors.

## **Appendix G:**

We understand the county is not planning on locating vote centers in police centers, in recognition that some communities have mixed feelings regarding law enforcement. We would encourage the county to remove the box saying “Denver Police Department District 3” on the Denver Colorado example vote center diagram.

## **Appendix J:**

The budget for advertising and voter outreach are significantly below estimated costs. Please include a discussion on how the county plans to close this gap.

We appreciate our partnership with you and your office and look forward to continuing to collaborate with you on implementing the VCA in Sacramento. Please do not hesitate to contact us with questions.

Sincerely,

Raul Macias  
ACLU of California

Nicolas Heidorn  
California Common Cause

Tamie Dramer  
Organize Sacramento

Chris Chaffee  
Emerging Latino Leadership Foundation

Paula Lee  
League of Women Voters of Sacramento County

CC

Supervisor Don Nottoli, Chair  
Supervisor Susan Peters, Vice Chair  
Supervisor Phil Serna  
Supervisor Patrick Kennedy  
Supervisor Sue Frost  
James Schwab, Secretary of State's office

November 14, 2017

Dear County Elections Officials,

First, we want to thank you for your willingness to move forward with the Voter's Choice Act, starting in 2018. We believe that with a lot of hard work from you and the community to make sure that the Voters Choice Act is implemented smoothly, with good outreach and public education, this could make voter participation more accessible to Californians across your county.

We know that young people continue to be underrepresented in the political process and at the polls. Numerous studies have shown that voting is habit forming, and young people who vote are more likely to become life-long voters. Our collective goal is to make sure young people are registered to vote, know how, where, and when to vote, and that they turn out to vote on Election Day, so that they become life-long voters and active participants in our democracy.

Unfortunately, only 52 percent of eligible young people between the ages of 18-24 were registered to vote in 2014, the last midterm election year in California, and only 8 percent voted. In addition to being under-registered, we are also concerned that many younger voters may not receive their vote by mail ballot, because they tend to use the mail less and also move more frequently than older age groups.

For those two reasons in particular, we are very interested in making sure that vote centers are accessible and visible to the eligible young voters in your county.

Therefore, as you move forward, we are writing to encourage you to consider siting vote centers in locations that are considered community centers for young people. In particular, we would like to make the following suggestions for siting vote centers on college campuses, including community college campuses.

1. Given that one vote center should be available per 10,000 registered voters for three days up to, and on Election Day, we urge you to site at least one vote center on each campus that has enrollment of close to or above 10,000 students. For larger campuses, more than one vote center may be appropriate and needed.
2. Additionally, we urge you to work with the school administration, student government, and other engaged student groups at those campuses to site the vote center(s) in a location that works best for the student body to see and access the vote center. At many schools, the student center would be an ideal location.

We are eager to work with you to both site vote centers effectively, and help do outreach to our communities about the coming changes in the Voters Choice Act, so that implementation is a success in your county. Please let us know how we can assist you in implementing these recommendations and other public outreach needed.

Thank you,

1. Emily Rusch, California Public Interest Research Group
2. Jen Tolentino, Rock the Vote
3. Kathay Feng, Common Cause
4. Gustavo Herrera, Young Invincibles
5. Robert Brandon, Campus Vote Project
6. Maggie White, California State Student Association
7. Manveer Sandhu, Student Trustee, Napa Valley College
8. Nooria Munir, Student Trustee, Sierra College
9. Harrison Anderson, President, Sacramento State Residence Hall Association
10. Travis Legault, Legislative Affairs Director, Associated Students at Sacramento State
11. Amirah Tulloch, Senator, Associated Students of Skyline College
12. Michelle Tam, Senator at Associated Students of Skyline College
13. Lidia Lara, Senator, Associated Student Body at American River College
14. Jeremy Trujillo, Vice President, Associated Student Body at Sierra College
15. Natalia Gomez, Director of Publicity, Associated Students of College of San Mateo
16. Edgar Verduzco, Director of Campus Affairs, Associated Student Body at Sierra College
17. Gulnar Amandurdyeva, Senator, Associated Student Body at Sierra College
18. Cinthya Alvarez, Senator, Associated Student Body at Sierra College
19. Ahmad Affas, Director of Public Relations, Associated Student Body at Sierra College
20. Veronica Lucido, Director of Finance, Associated Student Body at Sierra College
21. Rena Yamamoto, Senator, Associated Student Body at Sierra College
22. Sheryl Lal, Director of Communications, Associated Student Body at Sierra College
23. Josh Vines, Director of Social Media, Associated Student Body at Sierra College
24. Mollie Murbach, Co-president, Feminist Action Club at Sierra College
25. Megan Tanahashi, Co-President, Feminist Action Club at Sierra College
26. Emma Peterson, ICC Liaison, Civil Liberties Club at Cañada College
27. Carmina Cruz, President, Astronomy Club at Cañada College
28. Blake Mann, President, Young Entrepreneurs Club at Napa Valley College
29. Judianne Orozco, President, Umbrella Spectrum at Napa Valley College
30. Nicholas Mendoza, President, Society of Hispanic Professional Engineers at Napa Valley College
31. Amanda West, President, National Pan Hellenic Council at Sacramento State
32. Khalil Ferguson, President, Gamma Pi Fraternity at Sacramento State
33. Raven Kauba, President, Progressive Democrats at American River College
34. Leo Hobbs, President, Campus Crusades for Christ at American River College

35. Alysun Littlefield, President, Model United Nations at American River College
36. Wendy Callejas, President, Puente at American River College
37. Lizeth Espinoza, President, Latinos Unidos at American River College
38. Elena DeNecocochea, President, Feminists United at American River College
39. Jacqueline Lawler, President, Fierce at American River College
40. Ashley Richardson, President, American River College Cyber Security
41. Jason Lisic, President, SOARD at American River College
42. Tennison Big Day, President, Native American Student Union at American River College
43. Courtney Borders, President, Sociology Club at American River College
44. Gustavo Cruz-Velasquez, President, American Medical Student Association at Sacramento City College