Washoe County, Nevada
Registrar of Voters (ROV)
2022 Election Operational Review

Final Assessment Report

May 31, 2023

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Executive Summary

Election administration is among the most difficult local government jobs in America. In Washoe County, the Registrar of Voters (ROV) faces a unique set of challenges. Population growth, legal and technology changes, under-resourcing, and a strained relationship with local officials and community stakeholders have resulted in staff burnout and turnover. This manifested in many of the challenges the public witnessed in 2022.

There is an opportunity for leadership to position the ROV team for success and improve public relations primarily through investing in appropriate staffing levels, documenting standard operating procedures, improving certain processes, and actively communicating with the public and observers.

This assessment provides numerous forward-thinking recommendations to improve the ROV's operational accuracy, efficiency, security and transparency. For the reasons that immediately follow, we strongly recommend the ROV focuses on three significant areas for improvement well in advance of the 2024 Presidential Primary Election:

- Reorganize the overall ROV staffing structure to both increase staffing levels and add additional proficiencies in technology and communications.
- Document a comprehensive set of standard operating procedures for both critical and routine processes.
- Prioritize voter registration processes to ensure accurate precincts and district addresses, add new residential developments to the street file index, prevent backlog of paper applications, check responses to notices and update voter statuses where appropriate, and ensure all list maintenance procedures are performed regularly.

The ROV office has experienced significant turnover in leadership and staffing since the 2020 election cycle. The current team did everything possible in 2022 and 2023 given the unprecedented turnover; inadequate staffing levels, experience and institutional knowledge; and significantly limited instructions and documentation available to them. Through hard work, they made required changes and ran a secure mid-term election. Nevertheless, service-level expectations were not met. Brute force labor is not a sustainable solution to the challenges facing the ROV. Only investment in capacity building and a concentrated effort to institute best practices and build documentation will enable Washoe County to deliver the election experience its constituents deserve.

In the months ahead, the ROV will implement technology changes that would challenge a seasoned elections professional. Most notably, in 2024, Nevada is migrating to a new voter registration and election management system. Staff must be positioned to navigate data migration, user acceptance testing, and training in order to be successful. While transitioning to the new voter registration and election management system, they must also be prepared in the event that a new system is not online in time for the upcoming election cycle. And they must handle this change while advancing better practices across the board. Further, all efforts to improve the accuracy of the current voter registration

database now will make the implementation of the new statewide system go more smoothly and will improve the mail ballot processes for any elections that must be conducted using the old system.

Since 2020, local officials have faced unique and urgent communication challenges due to heightened public scrutiny of elections. We learned election observers do not feel informed and perceive an adversarial relationship with staff. The ROV lacks a dedicated communications professional and a communications plan. There is a great opportunity to improve transparency by educating the public and building better relationships with election observers and other stakeholders by adding a communications professional to its executive team.

Stress and burnout are real issues for the under-resourced office. Reorganizing the office and expanding current staffing levels is essential. Instituting better practices and making the job easier by equipping staff with easy to follow SOPs is equally important. The pressures on the office and the pace of change are unlikely to abate soon. Early voting for the next election begins January 27, 2024. A larger team with specified professional knowledge, skills and abilities in a more structured office will help Washoe County meet expectations of the voters.

How We Got Here

Washoe County's Office of the County Manager contracted with The Elections Group (TEG) to provide an operational review of the ROV's 2022 elections processes and staffing and make recommendations to the County Manager. The project goal is to improve the operational effectiveness and accuracy of the Washoe County election process.

This report, including findings and recommendations, is based upon onsite meetings and interviews with the ROV staff and internal and external stakeholders, a tour of the ROV workspace and warehouse, and observation of ROV staff at work. TEG's team never had access to sensitive data such as personally identifiable information (PII), nor did they touch any election technology equipment. TEG staff were always supervised by the ROV or her staff. Further, TEG did not receive any voter or tabulation database system files. Documents shared with TEG staff, such as sample election worker guides, were publicly available.

The Statement of Work specifically lists the following areas to be included in the review:

- Ballot development and proof-reading process (What led to ballot errors?)
- Ballot mailing process with K&H printing (Why were mail ballots delayed getting to voters?)
- Ballot distribution process with the United States Postal Service (USPS) (Why were mail ballots delayed getting to voters?)
- Best practices options for tracking mailed ballots
- Best practices for documenting standard operating procedures (SOPs)
- Managing automatic voter registration (AVR) and voter record maintenance
- Washoe County ROV staffing model (essential areas of expertise and operational redundancy)
- ROV full-time and temporary staff training

- Communications and coordination with:
    - Nevada Secretary of State (SOS) office
    - Internal stakeholders
    - Voting locations
- Washoe County elections technology infrastructure
    - Electronic pollbooks
    - Voting machines
    - Ballot sorter
    - Election software platforms and applications

Part 1 - Staffing, Organizational Structure and Training

Observations

Washoe County is growing quickly, putting significant pressures on the ROV to keep records and maps up to date. In January 2010, Washoe County had 238,965 active and inactive registered voters and a total population of around 420,000.[1] A little more than a decade later, Washoe's total active and inactive registered voters increased to 364,311 with a total population exceeding 500,000. That is more than a 50% increase in registered voters without an increase in staff positions to match the increased workload.

In addition, the ROV has had to adapt to rapidly changing laws and regulations. In 2021, Nevada lawmakers required the ROV to mail a ballot to all registered voters and made other significant reforms demanding increased technical and professional support.

The role of the Registrar of Voters should entail managing the entire office, including:

- Formulating and implementing long-term strategic goals
- Assessing and providing feedback on proposed legislation and its potential impact on Washoe County and its voters
- Improving transparency through community outreach
- Identifying and adopting the best practices utilized by other states and jurisdictions nationwide.

This is not to mention leading internal and external communications, managing legal compliance, fundraising and budgeting, organizational risk management across cyber, physical, reputational and operational risk sets, and also ensuring the office hits the nuts and bolts of election administration.

However, the ROV is currently burdened with the minutiae of daily office operations due to understaffing, and the present situation necessitates a collective effort to handle each task. Ultimately this compromises the ability to focus on process improvement and long-term strategic planning.

Positions are siloed and there are not enough staff to ensure redundancy in task management. When only one staff member knows how to do a job, it creates a "single point of failure" because without them, work cannot be completed. They increase systemic risks due to each staff member being highly specialized without the benefit of cross-training. If someone is out of the office, there is no one who can complete their assigned tasks. Further, because specialized tasks take significant time to complete, documentation for the work has not been created or maintained, and staff have not been cross-trained.

[1] See NV Secretary of State's website and the Nevada Regional Economic Analysis Project

In an environment where staff taking time off to rest and recharge is essential the ROV must prioritize documentation and cross-training without disrupting normal daily tasks.

The County's Technology Services Division (TS) plans to cease support of the ROV's specific technology and software applications and convert to a network support-only role. While this may make business sense for TS, it will exacerbate the technology support gap inside ROV and further underscores the need to increase technology support within the ROV office.

We found a disconnect between how the ROV and the County felt they were communicating externally and internally, and how stakeholders who received the communications felt. County leadership and the ROV felt strongly that they were adequately communicating about issues and problems with the election, rules surrounding the election, and other matters. Regardless, findings include:

- External and internal stakeholders felt strongly that they were not being communicated with enough.
- A skeptical portion of the public is demanding more information so they can understand election administration.
- Stakeholders and observers shared their desires to understand election processes.
- When observers had questions, they had trouble finding someone available who could answer their questions. Documentation explaining the procedures was non-existent.

Closing this communications gap can decrease confusion and increase transparency. This is not unique to Washoe – increased professional communications staffing in election administration is a national trend.

Findings

The increase in registered voters, combined with a major overhaul in how elections are administered, requires additional staffing and a revised organizational structure to successfully administer elections without significant issues, support the growth in population and voters, and implement changes to election law enacted over the last two election cycles. The office is recruiting to fill existing vacancies, but even with all positions filled, the current staffing levels are not adequate.

Recommendations

Recommendation 1: Increase executive team management capacity and overall team size. Adding additional executive positions or reclassifying existing specialist positions to management roles will enable increased oversight of staff, including temporary workers, and increase successful execution of tasks. Additionally, the ROV will be free to concentrate on management of the executive team, engage with community and legislative leaders, focus on long-term strategic planning, and implement the best practices presented in this document. Together, these changes will increase Washoe County's ability to continually improve its administration of elections.

There is no one-size-fits-all organizational structure for election administration offices. To reshape the current structure, we suggest the county consider two options. Either one will accomplish the county's goals of a more functional ROV and the ROV's goals of allowing for staff specialization with cross-training, redundancy and proper oversight.

In both options, we argue for an increased number of office assistants, which will reduce the ROV's reliance on temporary employees to perform critical tasks. Election administration is complex. It also requires staff to work with sensitive personal identifiable information (PII). Temporary employees are best used to accomplish simple and repetitive tasks or tasks where there is plenty of direction and oversight. The ROV is delegating too many complex administrative tasks to temporary employees at this time without performing quality control checks. Using temporary employees does not allow for long-term knowledge retention and temporary staff members are less accountable to breaches than permanent employees.

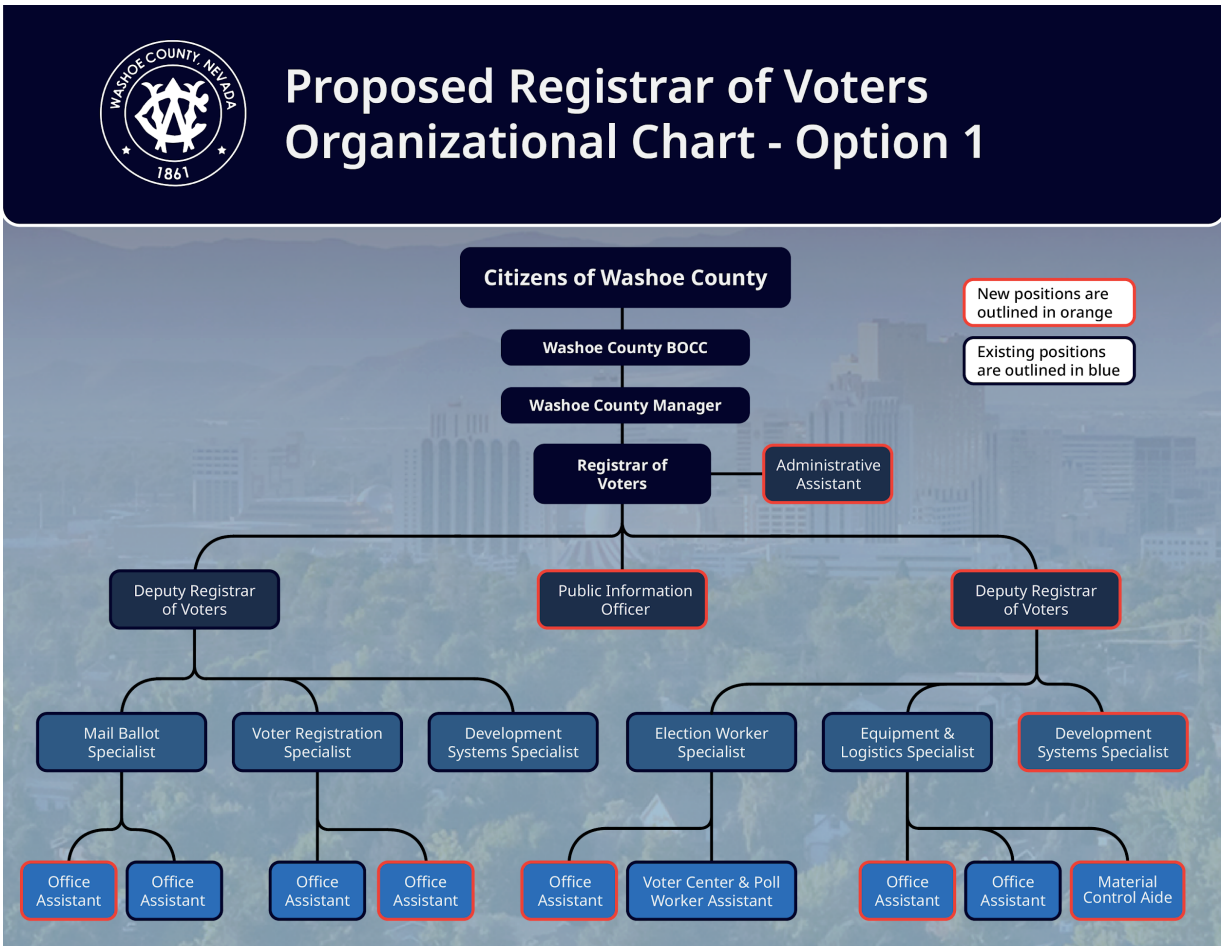
Option 1: Hire an additional deputy registrar of voters (DROV).

Under this option, the current duties split between the ROV and the DROV would be moved to two deputy ROVs. The two DROVs would oversee the election administration and operation tasks.

Both DROVs would oversee a development systems specialist (DSS) responsible for supporting technology and applications for their specific sections. However, the DSS employees would be cross-trained on the entire technology infrastructure, increasing the organization's resiliency and allowing for redundancy in the area of technology. At least one of these DSS positions should be a certified project manager or have project management experience to ensure technology projects are managed successfully.

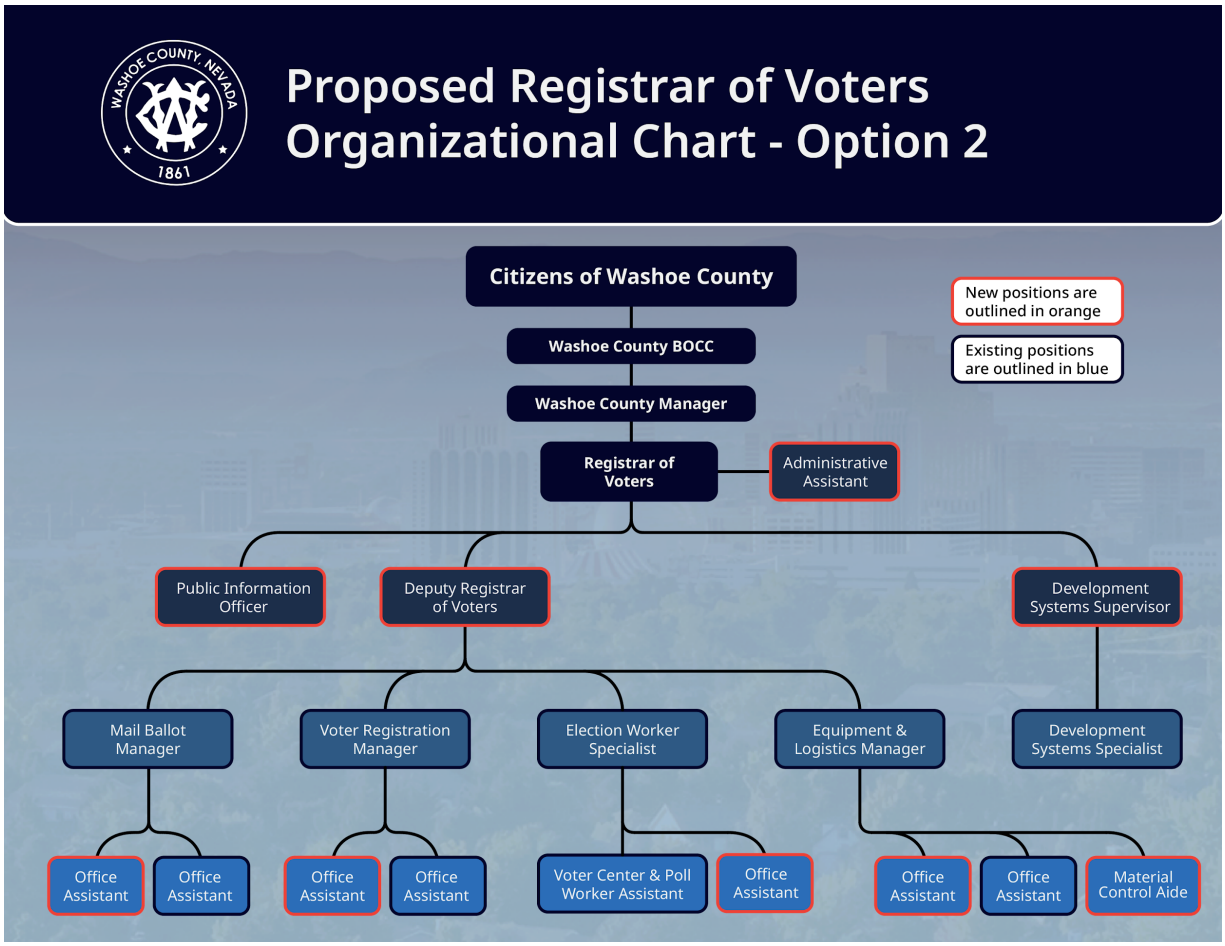
One DROV would directly oversee a voter registration specialist, a mail ballot process specialist, and several office assistants to accomplish the complex tasks involved within those process areas. The second DROV would oversee election operations including early voting and Election Day responsibilities. The equipment and logistics specialist (E&L)[2] will be coordinating the warehouse activities, including inventory and delivery of supplies, as well as programming, testing, and maintaining the voting systems and electronic pollbooks.

[2] The ROV's current organizational chart has four positions called election specialists. TEG renamed these election specialists with descriptions as to their primary job duties only to add clarity to the recommended changes to the organization and workflow.



Option 2: Reclassify specialist positions as managers.

A second option would flatten the organizational chart by keeping one DROV but reclassifying existing specialist positions to managers. In this option, less executive oversight would increase the need for more experienced individuals with strong management skills to ensure smooth operations and oversight of technical positions. Under this option, we suggest the technology team report directly to the ROV to ensure adequate coverage of all election technology and software applications. Further, one DSS should be reclassified to development systems supervisor. This individual should be a certified project manager or have experience in project management to ensure technology projects are managed appropriately.



Recommendation 2: Hire a full-time public information officer (PIO).

A full-time public information officer can address many of the observations and findings listed above by:

- Creating a comprehensive communications plan, a crisis communications plan, and educational materials for voters and observers
- Providing an accessible point of contact for media and observers
- Managing the ROV website and its content
- Building relationships with community groups, non-profit organizations, and other government departments and institutions
- Drafting answers to common questions for staff responding to voters by phone, email, and the 311 hotline
- Helping the ROV respond to media inquiries and prepare for interviews
- Providing subject matter expertise for SOPs, forms, and user guides to ensure they can be understood by staff and observers
- Coordinating with Washoe County Communications and the Secretary of State's office to ensure consistent, effective messaging.

Further, it is necessary to place the full-time position within the ROV department and on the ROV's leadership team. This will ensure the PIO fully understands Washoe County's election procedures and state and federal laws so they can support the information needs of the public. The PIO can help increase understanding by creating information sheets and observer training materials on subjects from logic and accuracy testing[3] to early voting precinct ballot acceptance procedures, through ballot processing and tabulation.

Recommendation 3: Hire a senior-level election security officer or allocate funding for this function as a contracted position.

This recommendation is not found on our options for proposed organization charts. However, a county the size of Washoe requires focused and dedicated attention to the physical and cybersecurity aspects of election functions and the integration of those into the County as a whole. Considering the sizable national risk profile of elections, the ROV should strongly consider hiring a senior level election security officer or planning to fulfill these duties through a contracted position. This can take the form of a chief technology officer (CTO), a chief information security officer (CISO), a program manager with critical infrastructure experience, or some hybrid of these. Whether this position is housed in the ROV, within TS, or added to the duties of the new development systems supervisor position proposed in Option 2 above, the focus on this area is critical.

While TS offers some networking and hardware technical support, it is doing likewise for other County agencies and staff. In our meeting with TS staff, they expressed a desire to reduce direct support of software applications for ROV. Washoe County and the ROV face significant risks and the County should prepare to adequately address issues related to software usability and suitability questions (noted elsewhere in this report), the State's intentions to move forward with new voter registration system, and the general cybersecurity environment.

The State's implementation of a new "top-down" voter registration system[4] will create significant challenges for Washoe County both during and after the project. Even though the State will be leading the project, Washoe needs to protect its interests and its voters' interests by creating a county risk identification and mitigation plan, which can guide efforts during the transition and as the new system becomes fully operational. The ROV should take a proactive approach to working with the SOS office and the County to ensure it can conduct elections in an efficient, secure and professional manner.

This position will work with TS, the County Manager, County Commissioners, the ROV, and the SOS to ensure that the County is applying best practices and managing the responsibilities to voters. Specific

[3] Logic and accuracy testing (LAT) is pre-election testing of the voting equipment to verify the proper functioning of electric and mechanical system components and to make sure the equipment is reading, tallying, and reporting ballot results correctly.

[4] Washoe County currently uses DIMS, or Data Information Management Systems, as its voter registration management software. It was acquired by Runbeck Election Services, Inc. from Elections Systems and Software (ES&S). A top-down elections system allows counties to manage voter registration, list maintenance, ballot distribution, and other essential functions. Nevada will begin phasing in a top-down system for use in the 2024 elections. This transition is discussed more fully in Part 4.

initiatives that should be undertaken by this position are addressed below in Part 6, “Elections Technology Infrastructure.”

Recommendation 4: Hire an administrative assistant for the executive team (ROV, DROVs and PIO).

The ROV reported that many sensitive administrative functions consume significant amounts of time in the office. These tasks can be addressed through a support position, freeing senior staff from burdensome tasks that draw them away from essential duties. Essential job functions for this position would include:

- Coordinating fulfillment of public records requests
- Scheduling and organization for the ROV
- Updating and monitoring election management and legal compliance calendars
- Supporting the elections specialists with front counter and customer assistance tasks
- Daily support of traditional administrative tasks (e.g. preparing copies, sorting mail)

Recommendation 5: Hire additional office assistants.

To meet the demands of the 2024 elections and beyond, as well as the new statewide voter registration and election management system, it is crucial to add permanent office assistant positions. While temporary workers may seem viable, constant turnover of temps creates challenges in training and knowledge transfer. The most viable solution is to hire full-time, permanent office assistants, greatly improving consistency and retention of institutional knowledge.

Recommendation 6: Contract with a project manager to coordinate with the County and the election technology providers to ensure a smooth transition to the new voter registration and election management system and to implement other planned technology projects.

Major technology transitions come with many risks to normal operations. Washoe County may soon implement several new systems:

- Voter registration and election management system
- Ballot sorter project
- Ballot tracking system
- Ballot duplication system (Sentio[5])
- Electronic pollbooks

This transition is complex and will require internal project planning and coordination between the ROV, TS, and the vendors to ensure all pieces of the projects are being completed on time, that each vendor is fulfilling its requirements in the contract, and that the County is providing all information necessary for

[5] Sentio is a software and hardware system by Runbeck Election Services, Inc. that allows counties to print individual ballots that are compatible with the tabulation system.

the project to be delivered successfully within the proposed budget. The project manager will also coordinate with the appropriate TS personnel involved with data migration and validation, GIS, electronic pollbook implementation, and other aspects of this project. An experienced project management professional (PMP) will have the necessary skills and abilities to complete these tasks and allow ROV staff to continue focusing on their specific tasks and duties in preparation of the 2024 election.

Recommendation 7: Create SOPs and regularly test and perform quality control checks of the procedures.

The ROV lacks comprehensive documentation for many essential processes. This problem is exacerbated by the 100% turnover in permanent staff and a loss of institutional knowledge. SOPs will help ensure that work is done accurately, completely, and in compliance with state and federal law. The SOPs are most helpful if they are regularly tested by having supervisors perform quality control checks to determine if the procedures are adequate and being followed. Development of SOPs supports the successful cross-training of staff and eliminates single points of failure should additional staff turnover occur.

Recommendation 8: Build a staff development and onboarding program.

Due to extensive turnover in the office, several positions have been filled by individuals with limited experience administering elections (including the ROV). It is imperative that the County invest in a robust staff development and onboarding program to improve retention.

A staff development and onboarding program could include a training academy for onboarding to develop core competencies and an understanding of the various aspects of election administration. The onboarding can be driven by the SOPs and other documentation. It can cover voter registration and election management systems, electronic pollbooks, voting machines, data entry and voter list maintenance, and election worker recruitment and management. Finally, as part of onboarding, new staff should be assigned a mentor.

Staff development should include regular review of the proposed onboarding program and investment in staff development classes. This may include enrollment in one of several nationally accredited university programs in election administration.

Recommendation 9: Hire temporary workers to support mail ballot processing.

Currently, mail ballot processing is mainly performed by County employees. There is a need for more workers in most of the mail ballot processing areas. With the development of SOPs, the ROV should hire temporary workers who can be trained to process mail ballots. These workers should be supervised by full-time employees to ensure compliance with SOPs.

Table of Recommendations Part 1. Staffing, Organizational Structure and Training	
Recommendation 1. Increase executive team management capacity and overall team size.	
Total TEG Hours	N/A
Recommendation 2. Hire a full-time public information officer.	
Total TEG Hours	N/A
Recommendation 3. Hire a senior-level election security officer or allocate funding for this function as a contracted position.	
Total TEG Hours	N/A
Recommendation 4. Hire an administrative assistant for the executive team (ROV, DROVs, and PIO).	
Total TEG Hours	N/A
Recommendation 5. Hire additional office assistants.	
Total TEG Hours	N/A
Recommendation 6. Contract with a project manager to coordinate with the County and the election technology providers to ensure a smooth transition to the new voter registration and election management system and to implement other planned technology projects.	
Total TEG Hours	N/A
Recommendation 7. Create SOPs and regularly test and perform quality control checks of the procedures.	
Total TEG Hours	See Part 8
Recommendation 8. Build a staff development and onboarding program.	
Total TEG Hours	N/A
Recommendation 9. Hire temporary workers to support mail ballot processing.	
Total TEG Hours	N/A
Total Estimated Hours	0 hours

Part 2 - Ballots

Section 1 - Ballot Development and Proofreading Process

Creating accurate ballots requires precision and attention to detail. Avoidable mistakes can add significant financial costs, create legal implications, and harm public confidence in elections. Ballot proofing, the process of ensuring accurate ballots, deserves a high degree of attention.

Standardization of the process, meticulous record keeping, and diligent follow-up will help ensure ROV staff do not miss items that are supposed to appear on the ballot – and that all information on the ballot accurately matches primary sources.

This section addresses the request to examine the ballot development and proofreading process that led to errors and ballot reprints in the 2022 November Election.

Observations

The ROV does not have adequate SOPs or a documented business process for ballot development and proofreading. Staff was challenged because of their collective inexperience and lack of institutional knowledge of the process and legal requirements. They also had little in the way of documentation to instruct or direct them. All of these factors led to issues during the proofing process.

Ballot development begins with having a complete picture of what offices are up for election each cycle for each jurisdiction. This includes developing a template for candidate office titles, terms of office and ballot access standards. For each election there should also be a checklist and organizational method for all candidate filings, ballot measures, and certified lists of candidates and ballot measures from the SOS. The source material, including the original filing paperwork, must be saved as well as any supplemental information such as amendments to how a candidate's name should appear on the ballot. Ideally, all documentation would be scanned and saved on the network drive. ROV staff indicated that they had issues with their network folders and that sometimes documents would disappear, leaving ROV staff to primarily rely on a paper filing system.

Due to turnover, there is inadequate experience and training for staff in ballot development and programming the ballots in the election management system (EMS). Some jurisdictions, including ROV, contract with the voting system vendor to program and lay out the ballot. The vendor uses a variety of definition files, including an approved list of contests, candidates, ballot measures, and other ballot information. In these cases, staff must still proof the inputs sent to the vendor as well as the files that come back from the vendor. The same is true for print vendors. Ultimately, it is the responsibility of the election official, not a vendor, to ensure the ballot is correct. The EMS should be reviewed for functionality and SOP development.

At a minimum, the process should look something like this:

- Collect and input all contest, candidate, and ballot measure data into the voting system.
- Using a master list generated by the voting system, proof all contests, candidates and ballot measures data against primary source materials to ensure clean ballot production.
- Once approved, print and secure the master list for future proofing.
- Proof ballots against the master list to ensure no inadvertent changes were made to the voting system data during the printing and production process.
- Proof unique collections of contests, also known as ballot styles, against a ballot style report generated by the EMS, showing for each ballot style the jurisdiction list and affected precincts.
- Send a ballot proof to each candidate or coordinating entity for approval.
- Proof preproduction and postproduction ballots from ballot printer against the approved images.

Finding

A lack of standards in the ballot development and proofreading process for the 2022 November election led to several errors that were not identified until after sample ballots were mailed to voters. The ballots had missing content, an incorrect contest was included, and typographical errors resulted in a costly reprint of ballots.

Recommendations

Recommendation 1. Use strong record-keeping practices with SOPs for each task set.

It is not uncommon for teams to lose track of what work has been done and what remains to be done. The typical response to that uncertainty is to reset and proof everything again. Having predefined task sets will allow staff to track the progress of ballot proofing by logging the results at a summary level. With this information, those assigned to proofing will be able to avoid the extra work of unnecessarily rechecking everything because they will have a record of what has been done. Furthermore, this information is essential to manage progress and to determine if the pace of work is adequate to meet printing deadlines.

An electronic record keeping system will help with organization. The first tier of organization should include a comprehensive index of elected positions and districts built into a two-year, four-year, and six-year spreadsheet. The end result is a working list of every office up for election in every district, including term of office, the number of open seats, and at-large versus district-specific contests. Staff can verify the spreadsheet prior to each election cycle by actively contacting each district and verifying all open seats for the election year.

A second tier of organization is receiving and managing all candidate and ballot question filings for each election. All paper and electronic filings should be saved as PDFs and stored on a secure network drive folder for ease of access. Staff should adopt a standard naming convention for files (e.g. “Candidate Name_DDMMYYYY”). A spreadsheet should be created each election and include contact information for each candidate and district as well as fields to track official candidate names, dates of

filings, copies of communications, and other pertinent information so that all source material is easily identified during the proofing process and accessible to all involved.

SOPs for ballot development and proofing tasks should include:

- Pre-election – preparing for ballot composition
- Candidate paperwork
- Ballot information flow from all groups
- Ballot data Master List
- Ballot layout
- Audio ballot.

Recommendation 2. Review EMS and conduct quality control checks of the district and precinct assignments.

Periodic quality control checks of the voter database and election management system ensures voters are correctly placed in their appropriate voting districts and precincts and assigned the correct ballot style. This is key to preventing ballot style errors where voters receive a ballot that includes a question or contest they are not eligible to vote on or excludes a question or contest they are eligible to vote on.

- In coordination with GIS technical services, develop an SOP that checks for non-standard addresses, the address location sources (GIS or manual placement), and the district and precinct boundaries using a map-based visualization to validate voters have been correctly assigned.
- Before implementing VREMS, ROV should reach out to all of the districts (cities and special districts) for updated maps and legal descriptions, and coordinate with the assessor and GIS technical services to ensure the accuracy of the districts and precincts assignments within DIMS.
- A good resource for election officials is the National States Geographic Information Council (NSGIC) Geo-Enabled Elections Project.

Recommendation 3. Incorporate expectations for proofing into the ROV's intergovernmental agreements (IGAs) with coordinating districts.

The ROV should have an IGA or memorandum of understanding with every locality that submits ballot content. That agreement should establish a timeline and expectations for ballot content review. For example, Washoe County can agree to send each district sample ballots by a specified date prior to each election. The district would agree to review and either approve or recommend edits to the ballot artwork within a designated time frame.

Ballot artwork should be proofread prior to being sent to coordinating districts. Asking districts to proofread their own ballots does not shift the responsibility for accuracy away from the ROV. Rather, it can help reduce errors, enhance transparency, and foster productive communication.

TEG can provide IGA sample language. Any legal agreement should be reviewed by the County Attorney and routed for needed approvals. Communicate early with coordinating districts when implementing such changes.

Section 2 - Ballot Mailing and Distribution Process

Observations

In Nevada, mail ballots must be sent to in-state voters no later than 20 days prior to Election Day. Normally, the ROV would send ballot faces to the print vendor along with an initial voter list data file. This data file contains all the voters eligible for a mail ballot, each voter's mailing address, and the correct ballot style for each voter. Verifying the accuracy of the data extracts is the responsibility of the election official.

The ballot mailing in November was delayed due to errors in ballot development and an inaccurate proofing process. The print vendor accommodated a reprint of the county's ballots as quickly as possible; however, the ballot mailing was delayed. In the course of providing the print vendor with corrected ballot faces, the ROV also provided the print vendor with a whole new voter data file. This was unusual; the list of eligible mail ballot voters ought to remain the same. The ROV provided no explanation to the print vendor for this.

The vendor quality control process revealed that the number of voters in the new voter data file was different from the number of voters in the initial voter data file. As a result of this discrepancy, the ROV sent the vendor a supplemental voter data file.

Unfortunately, some voters who received Primary Election ballots did not receive General Election ballots in November, according to media reports. All voters in the media reports resided in one remote area of the County. This may indicate an error in the voter database extract process and/or defining the search parameters used to generate the voter data file. According to our interviews with the print vendor, the voters named in the media report did receive ballots in the Primary Election but did not appear in the November voter data file provided by the ROV.

The print vendor currently under contract with the ROV utilizes IMB tracking for all outgoing mail and provides access to ballot delivery reports for all their customers. These reports are an administrative tool that provide ballot tracking data on when ballots enter the USPS mail stream and are delivered. The ballot delivery reports for the ROV indicate that once dropped at the USPS, 99% of the November General Election ballots were delivered within five days. While there was not substantial evidence of widespread or systemic USPS delivery delays, there were issues of delivery delays in rural areas that should be addressed. It does not appear the ROV utilized these reports.

Stakeholder interviews indicated a significant breakdown in communication and absence of a crisis communications plan for addressing ballot mailing issues. Internally, more information about the ballot

error and mailing issues came from the media than through an internal problem identification and resolution process.

Detailed and accurate information on the issues was not identified nor communicated effectively among the primary stakeholders. This increased public confusion, brought scrutiny and eroded trust.

Identifying the problem and providing accurate public information was hampered by a lack of experience and training in database extracts, version control and tracking protocols, and an inability to use and monitor extracts and the technical reports available for quality control. Additionally, there are best practices in USPS mailing and ballot envelope design that may be available to enhance visibility by postal workers to help improve the rural delivery delays.

Finding

The 2022 ballot mailing and distribution process was delayed due to errors in the ballot development and proofing process (see Section 1 above for findings and recommendations related to ballot proofing). Some voters who received primary ballots reported not receiving their ballots in November. Designing and building ballots accurately and efficiently is critical.

Recommendations

Recommendation 4. Develop a business process map, SOPs, and quality control (QC) checks for voter database list extracts and the ballot printing and mailing process.

Efficient and timely ballot production and mailing are key to voter confidence. A business process map for producing voter lists for third-party vendors (print and mail, ballot tracking, etc.) is critical. A quality control process ensures the correct information is extracted by the ROV and received by the print vendor.

Documentation and development of the business process map, SOPs and QCs should consider:

- Process for verifying extracted voter data file and verification the vendor received and processed each file in full
- Voter list version control and document security protocols
- ROV monitoring of the ballot mailing via ballot delivery reports and validation
- Establishing a multi-year contract with the print vendor to ensure adequate planning for supplies and to establish relationships between vendor and ROV

Recommendation 5. Redesign the ballot packet to improve tracking and processing.

Depending on the passage of AB 192, a review and redesign of the outgoing envelope should be conducted to evaluate the use of best practices in USPS mailing options.

- Fully using intelligent mail barcodes (IMB) and ballot service type identifier (STID) technology enhances transparency in tracking through the USPS mail stream for quality assurance. It may also enhance functionality for voter-facing ballot tracking applications.
- Ballot design and full use of IMB technology would improve the ballot sorter process.

Recommendation 6. Develop a strong working partnership with print and mail business partners.

The ROV's local postmaster and print vendor are key business partners. Developing and maintaining best practices for communications and business processes are critical to successful ballot printing and mailing. This opens up a line of communication for addressing any issues throughout the election and increases an understanding of each organization's business processes. Before every election:

- Meet with the print vendor.
    - Review the mail delivery reports from prior elections together to evaluate the ZIP codes where delivery delays occurred in the past.
    - Establish a communication protocol for print and mail issues and USPS coordination.
    - Include the print vendor in the ballot packet review and redesign to leverage their experience in mailing best practices.
    - Review the election calendar, supply orders, and mailing timelines and expectations.
- Meet with the USPS Manager of Customer Relations.
    - Review the election calendar and all election mail needs, including ballots.
    - Establish communication protocols with the agency, including points of contact for local postmasters.
    - Use ElectionMail.org to report delivery issues and for election mail resources.

Recommendation 7. Ensure that ballot development and voter and ballot mailings are included in a crisis communications plan.

A recommendation for a crisis communication plan for the ROV is outlined in Part 5. Specifically addressing problems and delays in voter mailings and materials, including ballots, is essential. It is critical to include all administrative stakeholders, including print vendors and USPS, in crisis communications strategies.

Section 3 - Returned Mail Ballot Processing

Because processing returned mail ballots is complex – and is a process area we were asked to focus closely on – we divide the observations, findings and recommendations for this section by processing areas.

1. Initial ballot intake and collection
2. Process mapping, ballot tracking, and ballot accounting
3. Signature verification
4. Batch and cut

5. Ballot preparation
6. Scanning

Initial Ballot Intake and Collection

Ballot receiving begins with the initial intake of the ballots via mail (USPS) or by polling place drop box. Initial intake of the ballot should be straightforward for the voter, secure, and documented accurately for accounting purposes. Ballot chain of custody and security is a key component of intake and collection practices. The chain of custody should be in line with ballot processing and include utility for reconciliation and accounting, rather than simply to demonstrate they are counted.

Observations

Polling place intake

Returned mail ballot envelopes are deposited in drop boxes by voters or election workers after being counted by hand and date stamped by the polling location teams. Additionally, a barcode piece count system is used to receive mail ballots deposited in the polling place drop boxes.

Election workers have a hard time using the barcode piece count system, which results in misreads and miscounts. It often results in a different piece count than the hand count, which is logged but not reconciled. It provides little administrative or security benefit. The barcode system causes some voter confusion and creates unnecessary lines at the polling location. Because the barcode system is standalone, it does not update the voter's record to give voter credit or indicate a received ballot. Voters have expressed confusion because they see their envelope being scanned, but they do not see their record updated immediately online. This system is producing an error-prone piece count and is not useful in processing returned mail ballots.

Ballot drop box collection

Polling places have two sizes of ballot drop boxes. The large white drop boxes are used for early voting while the smaller, silver drop boxes are used for Election Day. The ROV should reconsider use of the small silver box for best practices in security, capacity, and collection. The size and design of these boxes allow ballots to spill out onto the floor when they are opened by collection teams.

While there is a report showing the aggregate number of mail ballots returned by precinct, the ROV does not have a reporting process to review ballot volume by individual dropbox location and date as a mechanism to evaluate voter usage, optimize collection schedules, and monitor dropbox capacity.

Ballot collection teams are assigned color-coded collection bags, seals, and custody forms. However, they are not provided with identifying apparel (such as vests or lanyards) or vehicle placards to help the public identify them as official collection teams.

Receiving (ROV ballot processing room) and ballot tracking

Teams of two workers receive USPS collections at the ballot processing room. Collections are completed daily, at a minimum. Teams of two workers also receive mail ballots from the ballot collection teams. This takes place at the ballot-receiving workstation, located across the room from the entry door used by ballot collection teams. This work area frequently experiences traffic and backlogs of waiting collection teams.

The receiving team hand counts the returned ballots and scans them using the same error-prone barcode piece count system used at polling places. Like the polling places, the team notes any discrepancies and attempts to resolve and reconcile the differences. There are times when the numbers from the chain of custody form do not match the numbers from the piece count report. This is most likely due to a poll worker incorrectly using the scanner to check a voter in or the piece count system not functioning correctly. There is risk to using error-prone and flawed technology that most certainly can result in election legal challenges. While this provides the public with an appearance of security, it can be dangerous if not accurate.

Space and staffing limitations, as well as separate locations for elections operations (warehouse and ballot processing), requires the ROV to suspend mail ballot processing at 7 p.m. on Election Night to receive and tally results from polling locations. In the 2022 General Election, there were more than 14,000 ballots returned on election night. (See Part 7: Space for additional recommendations.)

Mail Ballot Sorting System

The current configuration and functionality of the ROV's ballot sorter software and hardware restricts receiving and initial batching of mail ballots, as well as the accounting process. The staff has been very diligent in learning as much as possible about the system, but they would greatly benefit from support for this application and process area.

The ROV spends a great deal of effort during ballot processing on precinct sorting. The first sort of ballots into precincts requires maintaining ballots in a batch in precise order for signature verification. This has resulted in additional manual and technology processes, unnecessary ballot handling, and re-batching repeatedly in each process area. This makes batch and ballot accounting extremely complicated and nearly impossible. The law requires the ROV to report results by precinct, but does not require physically sorting by precinct.

The ballot envelope is designed with an envelope flap that covers the signature for privacy. The ballot sorter uses a laser removal system to cut the flap to expose the signature. Exposing the signature is necessary to validate the signature. Staff reported that the flap removal is error-prone and requires an additional step to remove the flaps that were missed or not fully lasered. In the future, if signatures are imaged[6], this will require an additional pass through the sorter. The flap is not a statutory requirement,

[6] The future implementation of VREMS will enable the signatures from returned ballot envelopes to be imaged and uploaded to the voter record for more accurate and efficient processing.

and jurisdictions that have moved away from it did not experience significant public concern or any reports of security issues.

The sorter is operated and managed by one staff person with support from two temporary staff. Additionally, this staff person has overall operational responsibility for the mail ballot processing room. This is inadequate staffing for those responsibilities. There is a lack of a fully dedicated technical staff person trained in uploads and reports, maintenance, and reconciliation. This operation should be supported by one permanent staff person solely dedicated to the operation and managing temporary workers assigned to move ballots to batches and labeling trays. Sufficient SOPs, job aids, and training are lacking for the ballot sorting system.

Finding

The ROV maintains an overlapping and duplicative system of electronic logs (barcode system) and chain of custody logs for the intake and receiving of ballots, which result in inaccuracies. The current system of ballot intake is inefficient and creates backlogs. Improvements can be made in simplifying the documentation and procedures and providing a more secure, accurate, and transparent process for ballot collection and intake.

Recommendations

Recommendation 8. Develop a simpler and more accurate ballot intake process.

There are simpler and more secure best practices for ballot receiving that are accurate and efficient and will eliminate errors and backlogs. Ballot security can be assured through chain of custody protocols, simpler and effective piece count protocols, and ballot receiving logs. Specifically:

- Eliminate the barcode ballot scanning system in the vote centers and the ballot processing center. Security protocols such as two-person teams, seal verification, and accurate and complete chain of custody forms provide more accurate security.
- Develop returned mail ballot processing SOPs with sections specifically addressing ballot receiving and intake procedures.
- Eliminate the manual date stamp happening at polling locations and during initial receiving.
- Use the sorter for date and time stamps. Work with the equipment vendor to adjust the date and time stamp to a location on the return envelope that is readable. This should also include maintenance or replacement of the components performing this function to ensure that every envelope receives a legible date and time stamp.
- There are space limitations in the current ballot collection room, but ballot receiving should be relocated at or near the primary entry door for collection teams.
- Develop a FAQ document for communicating ballot collection and accounting protocols to the public.

Recommendation 9. Improve ballot collection security and chain of custody protocols and documentation to enhance transparency and security.

- Develop a ballot drop box SOP with emphasis on security protocols with strategies to increase transparency and consistency.
- Provide branded collection team apparel, identification, and transportation for transparency.
- Replace the small silver drop boxes with the larger white ballot drop boxes for Election Day. As an alternative, reconfigure the smaller silver drop boxes with a bag or box insert to eliminate spillage.
- Review and update all chain of custody documentation for usability and best practices in security protocols, including an incident reporting and resolution protocol for any seal discrepancies or violations of secure chain of custody.
- Develop a system for estimating daily drop box and USPS volume.
    - This should include a log recording an approximate piece count by day for each location (see example).
    - This can be done efficiently by weighing mail trays. If scales are unavailable, an approximate piece count can be done by hand.
    - This will support optimizing the deployment of drop boxes and collection teams and schedules.

Drop Box/USPS Receiving Log							
Location	Oct. 30	Oct. 31	Nov. 1	Nov. 2	Nov. 3	Total	Location %
USPS	231	250	275	300	500	1,556	35.60%
Courthouse	100	125	160	175	210	770	17.62%
Public Library	50	82	101	135	152	520	11.90%
County Admin Bldg.	224	265	301	335	400	1,525	34.89%
Total	605	722	837	945	1,262	4,371	
Daily %	13.84%	16.52%	19.15%	21.62%	28.87%		

Recommendation 10. Improve ballot sorter functionality or consider a replacement.

The ROV's ballot sorter was purchased on the secondary market and, due to turnover and lack of process documentation, the County is not getting the full benefit this technology can provide. A good starting point will be a review of the current contract and any service/maintenance agreements to determine if the vendor can provide assistance in improving the current functionality. This should include:

- Ease by which data can be imported and exported out of the sorter for updating DIMS.
- Data exchange mapping to ensure functionality with future VREMS.

- Entering receiving location name for batches on first pass (e.g. USPS, ballot dropbox location name, polling location name).
- Capturing signature images from return envelopes for improving efficiency and security of the signature verification and cure process.
- Configuration of tray labels (including pocket piece count), predetermined batch sizes, audit reports, custom reports, and administrative functions that support ballot accounting.
- Calibrating the slicing/milling function so the sorter can be used for opening on a second pass; slicing open envelopes accepted during signature verification and diverting (not opening) envelopes that have been rejected.
- Documentation and user training.

If the vendor is unable to provide support in these areas, the county should consider replacing the equipment with newer, proven technology.

Recommendation 11. Eliminate the practice of physically sorting ballots by precinct.

Replace precinct sorting with precinct reporting and tracking. Enhancements to sorter functionality (allowing the sorter to bring the scanned image of the envelope signature and the reference image signature on screen for comparison)[7] and batch/ballot accounting makes precinct sorting unnecessary for providing detailed information on ballot tracking, receiving, or voter research.

At a minimum, an improved process should look something like this:

- Returned ballots are received from drop box collection teams and USPS by verifying custody logs and recording the piece count for each drop box location and/or USPS in a tracking spreadsheet.
- Envelopes are transferred to mail trays and processed through the sorter to;
    - credit voters for returning a ballot;
    - divert envelopes that appear to be too thick or too thin; and
    - divert envelopes where there is an issue with the voter ID or mail ballot tracking number.
- Trays are stored on carts in a staging area near the sorter while signature verification is performed using the electronic image of the envelope signature and the reference image.
- Once signature verification is complete, envelopes are run through the sorting equipment on a second pass designed to send those envelopes that have been accepted to “good” pockets and those that have been rejected to “bad” pockets.
    - Accepted/good envelopes should be sliced open during this second pass.
    - Program the sorter to stop filling pockets at a predetermined batch size, such as 100 ballots, for all batches of accepted ballots.

[7] This process is distinct from automated signature recognition, which is discussed below under Recommendation 15. Under this recommended process (Recommendation 11), the signature verification workers would compare the scanned image of the envelope signature against the signature on file in the voter registration database; both side-by-side on a computer screen. All decisions to accept or reject envelope signatures would be made by the election workers.

    - Program the sorter to create a batch identifier and a piece count. Batch ID and quantity should be printed on a tray label that accompanies the batch.
    - Rejected/bad envelopes are sent to a designated pocket and transferred to trays and a designated secure storage area for “cure” processing.
- Trays of accepted envelopes are sent to ballot extraction and preparation along with a batch tracking form and tray tag.
    - Piece count and batch ID from the tray tag are transferred to the batch tracking form (see example page 27). This becomes the starting piece count. Each time a tray of ballots is moved to a new processing area this number must be accounted for.
- Empty envelopes are zip tied together using a pre-drilled hole in the return envelope and the sorter tray tag is attached to the bundle for storage.
- Prepped ballots are sent to scanning stations programmed to accept any style of ballot.
    - Scanner should indicate the counting group prior to scanning, i.e. Early Voting, Election Day, Mail Ballots, Provisional, etc.
    - The card count/piece count provided by the scanning equipment for each batch is verified against the batch tracking form. If the count does not match, ballots should be counted by hand.
- Batch ID, scanner ID and batch size should be transferred to a batch label (along with additional information required for chain of custody) and also entered into the ballot manifest.
- Information from batch labels should be transferred to storage container labels if multiple batches are stored in the same container.
- In the event of a recount, all batches are rescanned with only the recounted contests being read.

Process Mapping, Ballot Tracking, and Accounting

Observations

Ballot and batch accounting forms are siloed for each ballot processing stage. While these forms do log the process, they do not effectively contribute to best practices in accounting and reconciliation. The current system is error-prone and makes it nearly impossible to reconcile. This creates much frustration and stress. By simplifying and designing a more efficient path for the ballot and using best practices for technology and procedures, the ROV can improve accounting and reconciliation for ballot tracking.

In several process areas, there is a manual and duplicative re-batching and sorting process. This is a result of limitations in DIMS and the ballot sorter, as well as policy decisions to sort by precinct. There is no cohesive or consolidated ballot batch tracking that connects one process to the next.

The ROV staff has implemented a well-organized tray and color-coding system for ballot batches and storage. Trays of ballots are transported back and forth across the room. The space and table configuration should be redesigned to create a circular flow of ballots from receiving to scanning. The ballot processing space is inadequate (see Part 7: Space). A cart system for tray storage and transport is recommended.

Evaluating and enhancing that process with improved ballot sorter labeling, eliminating physical precinct batching, and reviewing the physical path and transport of ballots and the space will improve and simplify the steps, and then the accounting.

ROV staff have worked diligently to develop some helpful job aids that document the current process in several areas (e.g. signature verification, opening and extraction, duplication, scanning, imprinting). However, there is room for improving those job aids in simplifying processes, as well as more clearly outlining the steps for the users (numbering, checklists, quick guides).

Providing and displaying the process flow and job aids would enhance election worker performance, public observation, and education. Once the recommended returned mail ballot process is implemented, the *Life of a Ballot* poster should be revised.

Finding

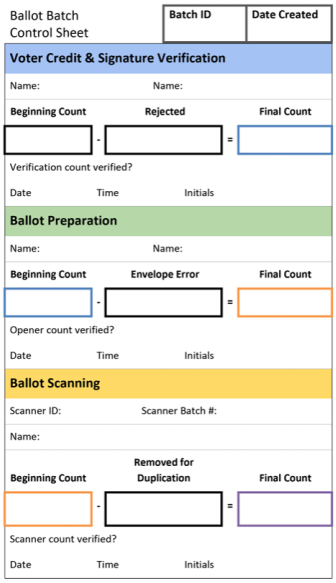
A straightforward and efficient process for ballot batch tracking and accounting is critical to election administration. It ensures the integrity and accuracy of the process and results in increased confidence and an organized and efficient path for counting ballots. The ROV uses many separate and unconnected logs to track each step of the inbound ballot process. The inbound processing logs are confusing and not effective in accounting and reconciling ballot tracking. Ballots are manually rebatched and criss-cross across each area multiple times.

Recommendations

Recommendation 12. Develop and implement SOPs for returned mail ballot processing and ballot accounting practices.

Improved and cohesive batch and ballot accounting forms document and follow the inbound ballot process in a way that will enable tracking and reconciliation of the ballots to balance and canvass the election more accurately. New procedures should include:

- Implement a single Ballot Batch Control Sheet (see figure example) that will follow the batch of ballots through the entire life cycle. This will provide accounting controls and transparency from one process to the next.
- Reevaluate the precinct batching process for simplifying batch and ballot tracking. Improving the functionality of the ballot sorter will support this recommendation.
- Train staff in the best practices of batching and accounting for ballot batches.


Ballot Batch Control Sheet

Batch ID | Date Created

Voter Credit & Signature Verification

Name: Name:

Beginning Count - Rejected = Final Count

Verification count verified?

Date Time Initials

Ballot Preparation

Name: Name:

Beginning Count - Envelope Error = Final Count

Opener count verified?

Date Time Initials

Ballot Scanning

Scanner ID: Scanner Batch #:

Name:

Beginning Count - Removed for Duplication = Final Count

Scanner count verified?

Date Time Initials

Recommendation 13. Develop and display visual support products throughout the returned ballot processing areas.

- Develop process flow charts, quick guides, and data visualization products for ballot processing and other areas.
- Consult and collaborate with public information and communications staff.

Signature Verification

Observations

Signature verification is currently an intensely manual process. Election workers physically handle batches of ballots with cumbersome accounting and logging procedures. There are seven stations with two temporary staff leads and a rover for transferring trays. The trays and batches must remain in order because the manual process requires envelopes to remain in order in the batch to work with the DIMS module.

The verifiers manually hold up the envelope to the signature reference displayed on the screen. The ROV staff have documented a job aid to help navigate the complicated DIMS process. The verification process is cumbersome and not a true ”two-tiered” verification process. The verifier manually reviews each envelope with the batch report and codes only any obvious missing signatures and deceased records. The signature envelopes with discrepancies are identified, but a lead worker reviews (“tier 2”) the batch before coding all challenged envelopes in the module. This appears to be an inefficient and inadequate quality assurance for a tier-two procedure.

The verifier (as indicated in the job aid) has a complicated number of steps in the module, and also physically sorts and stamps each envelope. This process is significantly dictated due to functionality and limitations of the DIMS module and ballot sorter. For example:

- The verification must use the physical ballot envelopes and manually handle and sort accepted and challenged ballots. The DIMS system and the sorter do not import images for signature verification from the first pass of the sorter.
- The verifier has many steps and “clicks” in the module to review signatures.
- The verifier is instructed not to use certain codes, such as “SPOUSE SIGNED.”
- The signatures for a batch are on the screen with one signature showing on a line for each. ballot. The verifier can click into the signature and click through additional images for review.
- The batch must remain in envelope order.
- There are circumstances that cause a batch to be displayed in reverse order.
- The process is also driven by the inability to correct the coding of an envelope within a batch or “go back” in the View Batch module. This can only happen in the AV module. It is unclear if this would be an appropriate process change for a true ”two-tier” verification process.

The Nevada SOS requires election workers to watch a signature verification training video. This training could be enhanced with written training, development of a quick guide, and revision of the job aid.

Note: The limitations with the database (DIMS) may make short-term improvements challenging.

Finding

The signature verification process is critical to access and security of elections. Administration of the process requires attention to the people and the technology. The process in Washoe County is mostly effective, but extremely inefficient and manual due to the technical limitations of the current voter database (DIMS). Staff shared that signature verification processing is at approximately 250 ballots per hour. This is very slow. There are opportunities for short-term improvements with the development of SOPs and job aids and for long-term improvement with the new statewide VREMS and a new mail ballot sorter.

Recommendations

Recommendation 14. Implement a two-tier signature verification process.

There are significant limitations in the modules for signature verification in the database (DIMS). However, there are efficiencies and quality assurance checks and balances in a two-tiered signature verification process that would be beneficial.

- Separate tier 1 and tier 2 signature verification and streamline tier 1 verification.
- Consider bipartisan teams for tier 2 review of challenged ballots.
- Ensure documented deficiencies in DIMS and sorter functionality are addressed in VREMS and ballot sorter implementation projects.
- Explore automated signature verification (ASV) technology if possible to maximize the efficiency of a two-tiered signature verification procedure.

Recommendation 15. Consideration of a new mail ballot sorter should include the positive improvements to the current signature verification process.

Modern ballot sorter technology has reporting and data capabilities that can be used for more efficient signature verification processes. There may be some challenges and limitations with DIMS that cannot be resolved until the new registration and election management system is implemented. The recommendation to improve the functionality of the current sorter or invest in a new sorter should include considerations for a system that can provide:

- Automated signature recognition (ASR).[8]
- Signature verification modules that use electronic images of the scanned signature from the envelope along with the voter's reference signature from the voter database.
    - Eliminates the need to physically handle and process ballot batches.

[8] ASR technology allows the user to set a threshold for how closely the signature from the scanned envelope must match the reference image to be accepted. In jurisdictions that leverage this technology (setting the threshold to require an almost perfect match) there are big gains in efficiency, saving much needed space and labor. Consider including this function for new equipment purchases should the Board decide to allow for it in the future.

    - Eliminates the need to transport ballots from the ballot sorter to signature verification and back.
    - Eliminates the need to keep batches in specific envelope order.
- Signature image uploads from DIMS or VREMS for faster and more efficient verification.
- Audit logs showing the number of envelopes accepted and rejected by each reviewer.

Recommendation 16. Enhance signature verification training and documentation.

- Develop additional signature verification training with presentation and documentation.
- Revise signature verification job aid.
- Develop a signature comparison quick guide.

Batch and Cut

Observations

The staff uses the Omation envelope slicer. It takes two people to run the equipment and batch, count, and document the process. Staff hand counts the batch (25-50 ballots), and reviews the precinct sort. This is time and labor intensive as well as redundant. Large batch sheets (READY TO CAST) are used for opening/extraction and scanning and replacing the previous batching information. This breaks the batch accounting. Along with the batch sheet, precinct number flags are inserted into the tray.

Finding

The ROV uses two Omation envelope slicers and staffs each with one person to slice open the accepted, return mail ballot envelopes and batch into a predetermined quantity. The ballot sorter has a slicer function, but staff reports that while it does not work well, it is a resolvable maintenance issue. This process is a redundant technology, labor, and space footprint.

Recommendations

Recommendation 17. Eliminate the duplicative batch and cut process and use ballot sorter technology for the batch and cut process.

A well-functioning ballot sorter has an envelope slicer function that would open the accepted ballots in the sort pass. This can eliminate the need for the separate cut and batch process.This would save space and labor, and eliminate the extra process step. The separate opening process, labor, and equipment also would provide for more efficient batching and counting. If implemented, it would significantly save labor and space.

Recommendation 18. Eliminate the Ready to Cast batch sheet and implement the single ballot batch control sheet.

Implementing the single ballot batch control sheet (see Recommendation 12) will provide for continuity and controls in accounting throughout the process.

Recommendation 19. Increase the final batch size from 50 to 100.

Each batch comes with a time cost associated with stopping and starting a procedure, completing batch control logs, and moving trays from one processing station to another. Increasing the batch size to 100 will reduce ballot processing time and increase efficiency in every stage of mail ballot processing.

Ballot Preparation

Observations

Ballot preparation has up to 12 people working as openers/extractors. Openers perform the work individually, not in teams. Working one envelope at a time, openers extract the ballot, remove a stub from the ballot, and then inspect for damaged or signed ballots. There is a quick guide on the wall for ballot inspection criteria, which was amended during the election to update new ballot inspection instructions. Staff commented on some confusion or inconsistency in extraction for what goes to reject/duplication. There is also confusion about the need for a ballot stub.

There are markers provided on the table for completing the “Ready to Cast” batch tracking sheet. Openers physically count the number of envelopes and ballots. However, there is nothing to match or compare the piece count to. The number is simply recorded on the batch tracking sheet. A different color batch tracking sheet is required each day.

Extracting ballots is time-consuming and it is not uncommon to have a processing backlog. Staff estimated that a single person could extract 200-250 ballots in 45-60 minutes. If fully staffed, that would be 2,400-3,000 per hour. This requires observation to confirm and seems optimistic. The productivity of an efficient and experienced team of openers is 350-400 per hour. Given the current volume of ballots and the increasing demand, there are not enough openers and there is a need for more space and workers for ballot extraction.

A lead supervisor reviews the batch and paperwork and sorts and directs outsorted ballots to shelving. Outsorted ballots are logged based on status (damaged, wrong precinct, etc.).

Finding

The current process of extracting ballots is not efficient. There is insufficient space for staff to expand extraction to meet the demand and volume of processing necessary to be at maximum capacity on Election Day for timely results. Mail ballot processing stops at 7 p.m. on election night to provide the

needed space for receiving and vote center tally. The ROV urgently needs process improvements to maximize the limited space available.

Recommendations

Recommendation 20. Implement a simplified ballot preparation process that maximizes productivity.

Preparing ballots for scanning primarily involves removing and flattening them. Simplifying this process will reduce confusion and error by the workers. Working in teams is faster and provides important checks and balances for accuracy in repetitive tasks. Specifically:

- Streamline ballot inspection to outsort only visibly damaged ballots and move more detailed ballot inspection for duplication to the scanning process.
- Use of a comprehensive ballot and batch tracking form (See Recommendation 12) will provide a simple way to record the ballot piece count while supporting better ballot accounting.
- Make use of ballot storage carts to reduce the traffic in the room.
- Remove Sharpies from the table - only red or green pens.

Recommendation 21. Staff a supervisor or lead who can dedicate their time to review and confirm each batch ballot control sheet and direct prepared ballots to the staging area for scanning.

The ROV should also train and assign a backup for situations in which the primary person assigned has to attend to other matters.

Recommendation 22. Work with the mail ballot print vendor to replace the ballot stub with a wrap.

A ballot stub is typically used by mail ballot print vendors to ensure each voter receives the correct ballot style in their mail ballot packet. The vendor used by the ROV is able to replace the ballot stub with a wrap that goes around the ballot and includes voter instructions and the “I Voted” sticker. Eliminating the ballot stub will improve efficiency.

Recommendation 23. Develop process map, SOP and job aids for ballot preparation.

- Develop process map for ballot preparation.
- Develop a ballot preparation SOP.
- Include ballot preparation section in mail ballot processing guide.
- Develop training and quick guides.

Scanning

Observations

Scanning and Imprinting

The scanning and imprinting process is located in a narrow space in a floor-to-ceiling cage that can be secured at night. It is used for storing ballots in various stages of processing, and trays move in and out of the space and back and forth within the space for processing. There is a separate, and unnecessary, process and technology for imprinting ballots to enable the post-election audit. The scanning and tabulation software has functionality to imprint as ballots are scanned, and the ROV should explore using this feature. Current staff was unaware that the scanners have imprinting capability; however, it was done in the past and they moved away from a consolidated process. This should be evaluated as much for the space it would free up as well as the efficiency gains.

The space for scanning workstations and ballot trays is cramped and the work area is not large enough to accommodate all the necessary trays and supplies. Ballots still remain in batches of 50 and election workers are hand-counting each batch at either imprinting or before scanning. Both the imprint scanners and the voting system scanners have the functionality for an accurate page count.

Staff scanning the ballots must request that full-time staff log them on to the ballot scanning workstations. There are no unique sign-in credentials for each user. Election workers are not authorized to sign-in to the ballot scanning workstations themselves, nor are they given passwords.

Despite the effort to manually sort ballots by precinct at various points throughout mail ballot processing, there are issues during scanning with batches not being accepted because a ballot from the wrong precinct has made its way into the batch. When this happens, the batch has to be deleted, ballots from a different precinct pulled out and annotated on the “Ready to Cast” form, and the batch rescanned. The ballots removed must be rebatched and rescanned at a later time.

Audit Preparation

Some of the steps taking place during the scanning process to prepare ballot batches for the post-election audit are unnecessary or need to be improved. They include:

- Ballots being imprinted with a unique number using a separate scanning device prior to the voting system scan.
- Batching ballots in quantities of 50 or less with one to four batches per tray.
- Hand-counting ballots after the imprint process.
- Hand-counting ballots after scanning into the voting system.
- As previously outlined, the READY TO CAST form is not efficient nor is it effectively providing ballot accounting. It requires extra time during the scanning process to add information that is either redundant or could be pre-filled using a modified form.

- Ballots are not being securely stored in sealed containers after scanning.

Vote center ballots are printed on voter verifiable paper audit trail (VVPAT) paper rolls. Each ballot is stored on the roll in the order it was cast. During the audit, a spooling system is used to locate the vote center ballots selected for audit. This process is cumbersome, and in locations with small turnouts, presents potential voter privacy issues.

Relatively inexpensive modifications to the current voting system, such as on-demand printers, could eliminate this cumbersome process. Voters could mark their paper ballot at the vote center and deposit it into a container for tabulation at the ROV's central count facility. These paper ballots issued at the vote centers would be the same as the mail ballots and would be imprinted and scanned using the same processes. Under this scenario, the ROV's post-election auditing would be less cumbersome because there would be no need to locate and roll out the VVPAT paper rolls to find and audit selected ballots. The ROV would still need to have a minimum of one ICX machine at each voting center to serve the voters with disabilities who may have issues marking a paper ballot privately and without assistance. These machines can be attached to an off-the-shelf printer as opposed to the VVPAT paper rolls. As Washoe continues to grow, the ROV should evaluate the VVPAT system and consider improvements for audit and potential voter privacy issues.

Duplication

Ballots that are damaged or unreadable by the scanners must be replicated. The job aid for duplication documents the current process well, although the examples appear to be outdated (reflective of an old voting system). Documentation for voter intent in duplication is not extensive. A bipartisan duplication board of two teams is responsible for duplicating and logging the ballots, with the second team verifying the ballots and signing off. Staff reported challenges in managing the volume of duplication and maintaining bipartisan teams.

Adjudication

Adjudication is performed by three bipartisan teams. Adjudication is completed twice a day and conducted on workstations inside the tabulation cage. The adjudication job aid recently developed documents the process well. However, the voter intent guidance in the adjudication job aid is primarily taken from the voting system manual and is limited. The Nevada SOS Elections Procedures Manual (NVEPM) has significant content for voter intent guidelines and should be the primary source for a guide. State law requires the rejection of a ballot with identifying marks.

Ballots marked with anything other than blue and black ink are outsorted and duplicated. Staff reported that it was their understanding that any other color could result in inaccurate tabulation, which is not correct. This is resulting in outsorting for duplication at ballot preparation, and again in scanning. This is likely resulting in unnecessary duplication.

Tally and Election Night Reporting

The tally room is secured by security badge access with an additional sign-in log. Badge access is restricted to five ROV permanent, full-time staff. It contains five internal, network-only workstations for ballot definition programming and election night downloads.

There is a separate connected workstation for secure file transfers with the SOS and uploads of Election Night results. Election Night results are not displayed via a third-party platform, but by posting results reports to the ROV website.

Unofficial results are updated throughout the night until the last vote center is loaded. In 2022, mail ballot processing was suspended at 7 p.m. to transition the workspace to receiving vote center supplies. The ROV had processed all received ballots at that time. A sizable number of mail ballots were returned on Election Night. ROV staff needed 2.5 to 3 additional days to complete the processing of those mail ballots and uploading of results after Election Day.

Observers can view activity in the tally room via a mirror and observation window in the office reception area. A security camera covers the tally room door, but not the activity inside the room.

Finding

The process of scanning ballots includes the imprint of ballots for post-election audit, duplication of damaged or unreadable ballots, and adjudication of ballots with overvotes or indeterminate marks. There are redundancies in each of the processes and potential opportunities to reduce complexity and improve efficiency and accuracy.

Recommendations

Recommendation 24. Consolidate imprinting and scanning into a single process.

- Consolidating imprinting and scanning would reduce equipment and provide additional needed space. Both the ballot imprinting scanners and tabulation system scanners have imprinting functionality.
- Streamline the process by using a comprehensive ballot batch tracking form and page count from the voting system scanner to verify the quantity of ballots scanned is correct. This would eliminate the need to hand count each batch. If there is a discrepancy, then a hand count can reconcile the discrepancy.

Recommendation 25. Reconfigure the scanning work area to include tables large enough to accommodate all equipment, trays, and supplies.

- Consider improved cable management or improved power infrastructure.

Recommendation 26. Revise the duplication and adjudication process to improve efficiency.

- Conduct a technical project assessment of using the Sentio ballot duplication/printing system to streamline and improve the accuracy of duplication.
- Use a single team to log, duplicate and verify ballots in a batch, with a call/write and switch to verify process.
- Develop Duplication and Adjudication job aids and training. Review for legal requirements, particularly rejection for identifying marks.
- Continue cross-training staff in technology applications for scanning, adjudication, and duplication for redundancy.

Recommendation 27. Develop a new voter intent guide to be used in duplication and adjudication.

The guide must be based on statues, the guidance given in the NVEPM, and best practices. This will provide a consistent framework for adjudication and duplication teams in most cases. Written documentation of how the ROV treats adjudications holds legal importance in the event of election contests.

Recommendation 28. The ROV should move to a single consolidated elections operations center.

The ROV's administration of elections and the public would greatly benefit from a single consolidated space for all elections operations. It would improve efficiency, continuity of operations from logistics and deployment, and election night receiving and ballot processing and tally. A single location would enhance security and improve access for public observation.

Section 4 - Voter Programs

Observations

Federal and state laws provide voters who are in the military or live overseas, or who have disabilities, with protections to ensure they are able to exercise their right to vote. These protections include specific programs for voter registration, longer mail ballot mailing timelines, and options to access transmission of voting materials and absentee ballots electronically. Additionally, the Ballot Cure program permits voters whose ballots are challenged a process to cure the defect (such as a missing or challenged signature). The demands for these programs are increasing as voter participation increases.

The UOCAVA/Disability[9] program is an administratively intense process. It requires significant correspondence and voter contact within the voting period and throughout the year for registration. Military and overseas citizens and their dependents are mobile and therefore require more updates to voter registration and ballot replacements to ensure timely access for voting. There is a need for more frequent pre-election communication to UOCAVA voters. Under federal law, UOCAVA ballots must be sent by the 45th day before each election. Having more frequent and earlier contact with UOCAVA voters well before that mailing deadline would reduce some of the administrative burden at the busiest and more stressful time for voters and staff.

Similarly, the ballot cure program is administratively labor intensive and requires the additional dedicated temporary staff. The program requires communication to voters on a tight timeline and often working with the voters individually to complete their cure process.

The demand for the programs has increased dramatically. There are similarities with both the UOCAVA/Disability program and the ballot cure programs that warrant combining their administration and support. One staff member oversees the process, which is inadequate for managing ballot preparation, correspondence, etc., and results in backlogs and delays.

There is not a dedicated workspace sufficient for administration of these two voter programs and the process is dispersed, making organization and efficiency difficult. The program needs an area with a computer workstation, tables for processing requests and preparing materials and correspondence, and adequate storage for equipment and supplies.

ROV staff communicates with voters in the ballot cure program primarily by mail. This includes the cure letter sent to voters. Voters can return their cure affidavit in person, or by smart phone application, mail, email or fax. The staff is also managing voter inquiries with phone calls and emails. If staff is unable to respond rapidly to voters, it results in additional calls and email demand. Ballot cures are tracked with a written log.

In Washoe County, voters can track their ballot status online by entering their information into the ROV's website or by signing up for BallotTrax, which sends updates to voters about their ballots using text, email, or voicemail message. The DIMS system and the 24-hour lag caused by the nightly uploads to the State's system meant that ballot tracking was not instantaneous. This problem was exacerbated by internal ballot tracking and accounting issues that made confirming voter ballot status difficult and time-consuming.

Additionally, voters who dropped off their ballot in a drop box and saw that the ballot was "scanned in" with the ROV's in-house system assumed that it was tied to the tracking system. The barcode receiving system is not a voter-facing tracking system. This resulted in voter confusion and concern, and

[9] UOCAVA stands for the Uniformed and Overseas Citizens Absentee Voting Act. Throughout this report, UOCAVA refers to military and overseas voters and their ballots. In Nevada, UOCAVA and voters with disabilities may vote using the online EASE portal that is maintained by the Secretary of State. Ballots received from UOCAVA voters or voters with disabilities using EASE must be replicated onto ballots that can be tabulated.

increased calls and emails to the ROV. This appears to be a combination of training issues as well as application functionality.

Finding

The UOCAVA/Disability and ballot cure programs are under-resourced and require additional support in staffing, best practices in administration and controls, and improved voter communication.

Recommendations

Recommendation 29. Dedicate additional staff and workspace for the UOCAVA/disability and ballot cure programs.

- Dedicate a full-time staff (OA) and temporary support during the election for the UOCAVA/Disability program. It is administratively demanding and also requires a great deal of voter contact and support.
- Develop a process map, SOPs, and correspondence templates (mail and implementing email).
- Update written logs to electronic tracking spreadsheets or system for each program to track and log ballot activity (correspondence, ballots, cure) and status.

Recommendation 30. Improve use of the current ballot tracking system and adopt a cure application.

- If DIMS is still in use for the 2024 elections, work with the SOS to implement BallotTrax and to ensure that the codes used to track ballot status updates are being used by all ROV staff in the same way.
- Determine whether to continue using Incode as the text to cure voter application or investigate using another option.
- Develop ballot tracking communication plan for voters on tools and timing of tracking.

Table of Recommendations Part 2. Ballots	
Section 1: Ballot Development and Proofing Process	
Recommendation 1. Use strong record-keeping practices, with SOPs for each task set.	
Total TEG Hours	N/A
Recommendation 2. Review EMS and conduct quality control checks of the district and precinct assignments.	
Total TEG Hours	N/A

Recommendation 3. Incorporate expectations for proofing into the ROV's intergovernmental agreements (IGAs) with coordinating districts.	
Total TEG Hours	N/A
Section 2: Ballot Mailing and Distribution Process	
Recommendation 4. Develop a business process map, SOPs, and quality control (QC) checks for voter database list extracts and the ballot printing and mailing process.	
Total TEG Hours	40 hours
Recommendation 5. Redesign ballot packet to improve tracking and processing.	
Total TEG Hours	N/A
Recommendation 6. Develop a strong working partnership with print and mail business partners.	
Total TEG Hours	N/A
Recommendation 7. Ensure that ballot development and voter and ballot mailings are included in a crisis communications plan.	
Total TEG Hours	N/A
Section 3: Inbound Ballot Process	
Recommendation 8. Develop a simpler and more accurate ballot intake process.	
Total TEG Hours	40 hours
Recommendation 9. Improve ballot collection security and chain of custody protocols and documentation to enhance transparency and security.	
Total TEG Hours	80 hours
Recommendation 10. Improve ballot sorter functionality or consider a replacement.	
Total TEG Hours	N/A
Recommendation 11. Eliminate the practice of physically sorting ballots by precinct.	
Total TEG Hours	N/A
Recommendation 12. Develop and implement SOPs for inbound mail ballot processing and ballot accounting practices.	

Total TEG Hours	120 hours
Recommendation 13. Develop and display visual support products throughout the returned ballot processing areas.	
Total TEG Hours	40 hours
Recommendation 14. Implement a two-tiered signature verification process.	
Total TEG Hours	60 hours
Recommendation 15. Consideration of a new mail ballot sorter should include the positive improvements to the current signature verification process.	
Total TEG Hours	N/A
Recommendation 16. Revise and enhance signature verification training and documentation.	
Total TEG Hours	60 hours
Recommendation 17. Eliminate the duplicative batch and cut process and use ballot sorter technology for the batch and cut process.	
Total TEG Hours	N/A
Recommendation 18. Eliminate the Ready to Cast batch sheet and implement the single ballot batch control sheet.	
Total TEG Hours	N/A
Recommendation 19. Increase the final batch size from 50 to 100.	
Total TEG Hours	N/A
Recommendation 20. Implement a simplified ballot preparation process that maximizes productivity.	
Total TEG Hours	N/A
Recommendation 21. Staff a supervisor or lead who can dedicate their time to review and confirm each batch ballot control sheet and direct prepared ballots to the staging area for scanning.	
Total TEG Hours	N/A
Recommendation 22. Work with the mail ballot print vendor to replace the ballot stub with a wrap.	

Total TEG Hours	N/A
Recommendation 23. Develop process map, SOP and job aids for ballot preparation	
Total TEG Hours	60 hours
Recommendation 24. Consolidate imprinting and scanning into a single process.	
Total TEG Hours	N/A
Recommendation 25. Reconfigure the scanning work area to include tables large enough to accommodate all equipment, trays, and supplies.	
Total TEG Hours	N/A
Recommendation 26. Revise the duplication and adjudication process to improve efficiency.	
Total TEG Hours	40 hours
Recommendation 27. Develop a new voter intent guide to be used in duplication and adjudication.	
Total TEG Hours	30 hours
Recommendation 28. The ROV should move to a single consolidated elections operations center.	
Total TEG Hours	N/A
Section 4: Voter Programs	
Recommendation 29. Dedicate additional staff and workspace for the UOCAVA/disability and ballot cure programs.	
Total TEG Hours	N/A
Recommendation 30. Improve use of the current ballot tracking system and adopt a cure application.	
Total TEG Hours	N/A
Total Estimated Hours	570 hours

Part 3 - Election Worker Management and Training

Section 1 - Election Worker Management System

Observations

Election worker management systems help staff keep track of election workers. Features typically include worker profiles, communications (e.g. email messaging), polling place assignments, and payroll.

Washoe County uses Konnech's PollChief® Poll Worker Management System (PollChief), a common product used by election offices. PollChief is capable of tracking election worker details and assignments. It also generates email communications. However, staff identified several frustrations. They were unable to generate reports sufficient for their needs, including needed payroll files. It also lacked certain necessary features, including splitting shifts between two workers.

Staff worked around system limitations by building reports, tracking assignments, and creating payroll files using Microsoft Excel. While it is not uncommon to use Excel to supplement a business system, using Excel for primary system functions like creating lists of workers at each polling place hurts accuracy and efficiency. It also defeats the purpose of investing in a vendor-supported system.

The full-time and temporary staff who use the system do not use it in a consistent, collaborative way. For example, the full-time staff expressed concern that temporary staff often delete important worker details from the system when updating records. This results in available workers appearing as unavailable to work. That is evidence of both software user documentation issues, but also issues with managerial training and oversight.

Staff were not formally trained in PollChief, nor did they have access to training materials from the vendor prior to the Primary Election. The current office assistant responsible for election worker placement had the aptitude to teach herself the system. Prior to the General Election, the ROV had three full time staff and two temporary staff trained by the vendor on the system.

TEG is not positioned to analyze the PollChief's functionality during this engagement. It is not clear whether some perceived system limitations are the result of a lack of training.

New election worker management functionality will be integrated in the state's forthcoming election management suite. The system will be implemented in phases, with voter registration being a top priority. Poll worker management functionality will not be available until 2025. The ROV plans to assess

whether the new system meets their poll worker management needs at that time, and intends to continue using PollChief in 2024.

Finding

In 2022, staff used an election worker management system for which there was no training or documented procedures. New staff were self-taught and developed workarounds that led to confusion about election worker availability during the Primary Election. As a result, some polling places were not fully staffed with qualified, trained individuals.

Recommendations

Recommendation 1. Develop a project plan to either retain PollChief or migrate to the State's new election worker management system.

TEG can help staff map out the business processes that an election worker management system needs to provide. They should consider whether PollChief, the new State system, or an alternate system best meets those needs.

It may be advantageous to leverage the existing contract with PollChief and require the vendor to make any necessary modifications and provide training and documentation, rather than break the contract prematurely, especially since the State's timeline is still unknown. If staff plan to use PollChief as their management system, the ROV should reach out to the vendor to schedule training for new staff and request updated reference materials and job aids.

As a last resort, staff can use their business process mapping as the basis of a new procurement. Staff should consider current contractual obligations and adhere to County purchasing policies.

Section 2 - Documentation and SOPs for Training and Recruitment

Observations

Election workers must be registered voters and have the ability to perform the job. Beyond that, Nevada counties have great discretion when hiring election workers. Recruitment in Washoe County is transparent and accessible – interested persons simply apply online. Staff conduct scripted interviews by phone, which they feel is an important step in screening applicants.

Election workers are classified as County employees and receive online links to Washoe County Human Resources' onboarding materials that they are required to complete. Staff explained some applicants have trouble navigating the portal, sometimes requiring staff to spend 30-45 minutes

assisting individual applicants. Staff do not believe this additional effort is a deterrent for election workers. While classifying election workers as employees for tax purposes is a common practice, TEG has not yet encountered these additional onboarding requirements in other counties with which it has worked.

No current staff is familiar with how election workers were trained in the past. The former assistant registrar of voters *was* the election worker training program. The primary reference during training was the election worker manual. However, there was no additional documentation such as slide decks, job aids, or sample training materials. When the position became vacant, the County was left without a training program.

Staff explained the previous instructor had a very good handle on things and was very adept at running the training classes. The trainer would use the manual as a training guide. However, training election workers is more than reading a manual. Teaching itself is a learned skill and familiarity with the subject matter and equipment is critical for hands-on, participatory learning. Whoever conducts election worker training for the February election will be doing so for the first time and without any documentation.

Staff experimented with having experienced election workers from previous elections come back to conduct training for new election workers. Feedback from new election workers was overwhelmingly negative, and staff learned that experienced election workers did not necessarily make effective teachers. This is an indicator of the importance of having an experienced trainer and amplifies the need for documentation and a well-designed training program.

The office has done well navigating the various components of election worker recruitment and onboarding as well as developing good relationships with election workers. However, there is a lack of mentorship and standard procedures.

Findings

Election worker onboarding and training has increased in complexity now that they are classified as employees. Recent turnover in the ROV has led to entry-level and temporary staff struggling to navigate an interagency effort without the benefit of experienced staff or SOPs. A standard, organized plan to onboard and train election workers is needed. The ROV needs to address the growing gap between job complexity and staff experience.

Recommendations

Recommendation 2. Develop SOPs for election worker management and training.

SOPs should be prepared to cover the end-to-end process from recruitment through payroll. Policies are just as important as procedures. Staff should have clear direction regarding County onboarding requirements, even if they ultimately fall under the purview of the Washoe County Comptroller's Department or HR.

ROV may consider whether there is an opportunity to connect with other Nevada counties who may have the institutional memory to help develop an election worker training plan.

Comprehensive SOPs should document business practices, identify key stakeholders (including other agencies), set forth generic timeline templates that can be modified each election cycle, include sample forms, and cite relevant policies or laws.

Recommendation 3. Develop and support a pool of instructors for election worker training.

Election administration and adult education and training are different skills, and it is important to support instructors by providing them with pointers, outlines, and other teaching support. Election worker instructors do not necessarily have to be permanent staff. Some jurisdictions hire temporary employees with a background in adult education and training and task them with developing course curriculum and accompanying materials. The ROV must establish the level of support and direction permanent staff will provide to temporary instructors – for example reviewing lesson plans and slides to ensure accuracy and maintain educational standards.

An adult education standard is that it takes roughly four hours of preparation time along with an hour of rehearsal to develop each hour of engaging, practical instruction. If instructors do not devote enough time and attention, their trainings may fall flat.

TEG can assist by developing an election worker training module, delivering custom training materials, and providing “train the trainer” sessions.

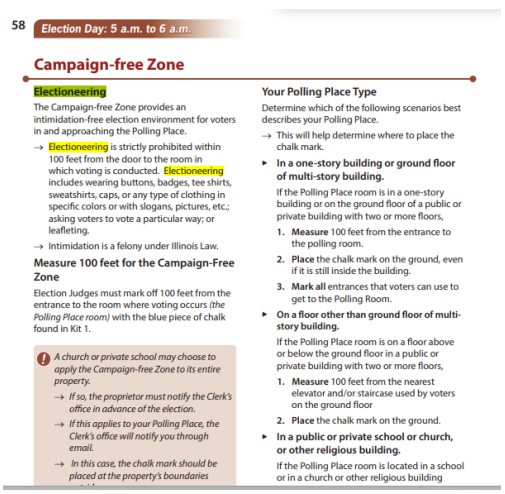
Section 3 - Election Worker Manual

Observations

Election workers perform complex tasks on unfamiliar equipment in a highly regulated environment under stressful conditions. The manual should help them find quick answers to common questions and easy-to-follow job aids for more complex tasks.

Staff clearly put a great deal of effort into the manual. Those efforts will benefit well from a redesign to improve usability. Some initial observations are as follows:

- Long, contextual information makes it difficult for election workers to quickly find solutions to help them at the polls.
- Bulleted lists and checklists are used inconsistently and key information often breaks across pages.
- There is minimal use of graphics, flow charts, pictograms and callouts.



58 Election Day: 5 a.m. to 6 a.m.

Campaign-free Zone

Electioneering

The Campaign-free Zone provides an intimidation-free election environment for voters in and approaching the Polling Place.

→ Electioneering is strictly prohibited within 100 feet from the door to the room in which voting is conducted. Electioneering includes wearing buttons, badges, tee shirts, sweatshirts, caps, or any type of clothing in specific colors or with slogans, pictures, etc.; asking voters to vote a particular way; or leafleting.

→ Intimidation is a felony under Illinois Law.

Measure 100 feet for the Campaign-Free Zone

Election Judges must mark off 100 feet from the entrance to the room where voting occurs *(the Polling Place room)* with the blue piece of chalk found in Kit 1.

A church or private school may choose to apply the Campaign-free Zone to its entire property.

→ *If so, the proprietor must notify the Clerk's office in advance of the election.*

→ *If this applies to your Polling Place, the Clerk's office will notify you through email.*

→ *In this case, the chalk mark should be placed at the property's boundaries*

Your Polling Place Type

Determine which of the following scenarios best describes your Polling Place.

→ This will help determine where to place the chalk mark.

▸ **In a one-story building or ground floor of multi-story building.**

If the Polling Place room is in a one-story building or on the ground floor of a public or private building with two or more floors,

1. **Measure** 100 feet from the entrance to the polling room.
2. **Place** the chalk mark on the ground, even if it is still inside the building.
3. **Mark all** entrances that voters can use to get to the Polling Room.

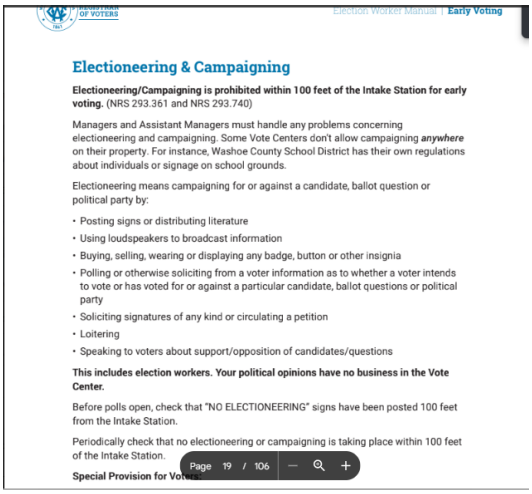
▸ **On a floor other than ground floor of multi-story building.**

If the Polling Place room is on a floor above or below the ground floor in a public or private building with two or more floors,

1. **Measure** 100 feet from the nearest elevator and/or staircase used by voters on the ground floor
2. **Place** the chalk mark on the ground.

▸ **In a public or private school or church, or other religious building.**

If the Polling Place room is located in a school or in a church or other religious building



Election Worker Manual | Early Voting

Electioneering & Campaigning

Electioneering/Campaigning is prohibited within 100 feet of the Intake Station for early voting. (NRS 293.361 and NRS 293.740)

Managers and Assistant Managers must handle any problems concerning electioneering and campaigning. Some Vote Centers don't allow campaigning ***anywhere*** on their property. For instance, Washoe County School District has their own regulations about individuals or signage on school grounds.

Electioneering means campaigning for or against a candidate, ballot question or political party by:

- Posting signs or distributing literature
- Using loudspeakers to broadcast information
- Buying, selling, wearing or displaying any badge, button or other insignia
- Polling or otherwise soliciting from a voter information as to whether a voter intends to vote or has voted for or against a particular candidate, ballot questions or political party
- Soliciting signatures of any kind or circulating a petition
- Loitering
- Speaking to voters about support/opposition of candidates/questions

This includes election workers. Your political opinions have no business in the Vote Center.

Before polls open, check that "NO ELECTIONEERING" signs have been posted 100 feet from the Intake Station.

Periodically check that no electioneering or campaigning is taking place within 100 feet of the Intake Station.

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Special Provision for Voters

Findings

The election worker manual is comprehensive but text-heavy, which diminishes its readability and usefulness for the election worker. Pictures and diagrams are not labeled in a way that the user can connect visual aids to the processes. At times, it reads more like a desk reference for full-time staff than a job aid for temporary election workers. The current manual can be greatly improved with a redesign to include more job aids, graphics and call-outs.

Recommendations

Recommendation 4. Redesign the election worker manual.
The election worker manual should be redesigned for maximum usability by election workers. If a comprehensive manual must be maintained, it should be supplemented with job aids. The goal of the guide is to help election workers “do the job” more so than “learn the job” or “expand their background knowledge of the job.”

TEG’s communication professionals can offer review and redesign services.

- Cut down the word count by reducing contextual information and statutory references. Election workers should not be directly accountable for interpreting the plain text of the law.
- Introduce more white space, callouts, graphics, and simple flow charts. Improve upon existing images through the use of simple overlays, such as arrows or callouts.
- Reorganize checklists into specific job aids.
- Apply design principles to make sure the manual is best suited for adult learning and the job aids are best suited for specific task completion.

Table of Recommendations Part 3. Election Worker Management	
Recommendation 1. Develop a project plan to either retain PollChief or migrate to the State's new election worker management system.	
Business process mapping	2 hours
Business process mapping format and design	2 hours
Develop scope of work and RFP	10 hours
Total time	15 hours
Total TEG Hours	29 hours
Implementation Notes: ROV staff involvement is essential for the process mapping exercise. Mapping can be facilitated in-person or remote. ROV staff involvement is not required for formatting. The client can determine the appropriate level of staff involvement for developing a scope of work and RFP.	
Recommendation 2. Develop SOPs for election worker management and training.	
Total TEG Hours	See Part 8
Implementation Notes: ROV staff involvement is essential for the procedural review. Collaboration can be done in person or remote.	
Recommendation 3. Develop and support a pool of instructors for election worker training.	
Develop an election worker training program (slide decks, sample exercises, etc.)	40 hours
Host an on-site "train the trainer" session	10 hours
Total TEG Hours	50 hours
Recommendation 4. Redesign the election worker manual.	
Election worker manual content edits	100 hours
Election worker manual design and layout edits	25 hours
Creation of job aids	25 hours
Total TEG Hours	150 hours
Total Estimated Hours	229 hours

Part 4 - Voter Registration

Key Observation

The ROV's current voter registration system is outdated and requires numerous manual workarounds to conduct voter registration data entry, updates and list maintenance. The State is in the process of purchasing a new statewide voter registration and election management system for use by the State and all 17 counties. Whether implementation will be started or completed before the 2024 election cycle is questionable. The ROV must plan for the possibility that the office will have to continue using its current system for 2024.

Background and Overview

Voter registration and list maintenance is the backbone of the election process. Its primary purpose is to ensure every eligible American citizen residing in Washoe County is able to vote without issue, and to prevent ineligible residents from voting in someone else's name. This is done through systematic record keeping to add, update, and remove voters from the rolls in compliance with state and federal law.

The system flags voter registration applicants who have eligibility issues. It keeps track of district boundaries for each election to determine what ballot style each voter should receive. It is used to indicate:

- Whether mail ballots have been sent or received
- Whether voters' signatures have been accepted or rejected
- Whether voters voted in person
- Whether provisional ballots have been accepted or rejected.

More recently, voter registration and election management systems have also been used to track election workers, polling places, ballot drop boxes, inventory and supplies, election deadlines, candidate filings, and petitions. Newer systems, such as the State's planned VREMS system, are GIS-based, which support much more accurate precinct and district assignments, allow more detailed planning for locating voting sites based on voter populations within geographic areas, and can improve public information available to voters based on real-time wait times during early voting and on Election Day.

Nevada's current statewide voter registration list has a "bottom-up" structure, meaning that the 17 counties each maintain their own database and then upload their data to the Nevada SOS centralized database nightly. The SOS combines the 17 county databases, compares the records for duplicates, and then sends files back to the counties each morning.

Washoe County's voter registration database, DIMS, is at the end of its technological life. The vendor is no longer supporting DIMS. The ROV, with the assistance of TS, has developed a system of patches and workarounds to make the database work as well as possible. None of the State's other counties

use DIMS, which means there are no external sources for help with its limitations and idiosyncrasies. Many of the technical issues with the DIMS system are discussed more fully below in the specific subsections.

The SOS has engaged in a multiyear effort to replace the State's current "bottom-up" database with a "top-down" database. The SOS would house the database infrastructure and each county would log in and share access. For this project, known as the Voter Registration and Election Management System ("VREMS"), the SOS has requested an appropriation from the legislature to purchase a system, which will then be implemented jointly with the counties. However, the implementation for the State and the counties is currently unknown.

It is currently unclear whether Washoe County or the State will be able to implement the new system in time to begin the preparations for the 2024 election cycle.

The management of voter registration, list maintenance, applications for mail ballots, and related tasks provides many opportunities for efficiency gains and significant cost cutting over time. When the ROV is able to transition to the new voter registration database, there will be opportunities to replace many of the manual tasks with automation. Until that becomes reality, the ROV needs to focus on developing strong SOPs and QC processes, while fully training and cross-training the voter registration staff. Investment in the staff and procedures now will help ensure that the voter database is accurate and that the transition from the current system to the statewide VREMS system goes more smoothly.

Section 1 - Voter Registration Data Entry

Observations

Data entry for voter registration is a lengthy, manual and error-prone process. Among the several processes requiring significant manual data entry are:

1. Paper voter registration forms
2. Mail ballot preference forms
3. Federal military or overseas voter documents (UOCAVA voters)
4. Responses to notices from the ROV

The DIMS system does not support many of the tasks that the ROV staff must perform in connection with the above processes. Staff have developed workarounds, external spreadsheets and SQL reports for data inquiries.

Current staff are all new to the ROV and have not been cross-trained on each other's duties. Staff have not been provided with sufficient training on voter registration laws, regulations, and guidance (such as

SOS and DMV-AVR[10] manuals). For most of these tasks, each team member performing voter registration duties has learned independently on the job and may be missing or misunderstanding critical information, such as how and when to perform list maintenance.

For most voter registration duties, significant and operationally hazardous siloing occurs when only one staff member in the ROV knows how to perform their specific tasks and there are no internal audits or quality control checks being performed. Staff are delegating many voter registration tasks to temporary employees who do not have the requisite training or accountability to ensure that they perform their tasks correctly.

Paper Voter Registration Forms

Paper voter registration forms come to the ROV via mail and voter registration drives. Each paper registration form must be individually scanned and attached to the appropriate voter record in DIMS. Temporary employees scan the paper forms and attach them manually to the appropriate voter record and make necessary additions or updates in DIMS. Paper forms are provided to one of the election specialists with a mix of handwritten notes and comments within DIMS as to whether notices need to be sent. At the time of our assessment, staff were still working on a backlog of paper applications that arrived during the General Election and post-election time period.

The ROV sends notice letters to applicants when required information is missing or there is a question concerning eligibility. When the ROV receives a response from the applicant, a temporary employee scans the letter and attaches it to the voter record and then gives the paper to an election specialist for further processing.

The ROV uses temporary employees to do the scanning and primary data entry, but does not have complete SOPs for this process. The ROV provided TEG with a document describing the various reasons for “pend” codes, but there was no indication that the temporary employees receive training on this information or how much training they might receive. In addition, hiring temporary employees creates a constant cycle of turnover and training. It is unclear whether there are any quality control measures in place for the data entry for paper forms.

Mail Ballot Preference Forms

After the Legislature enacted AB321 (2021), the ROV must mail a ballot to every active registered voter for each election, unless the voter opts out by submitting a mail ballot preference form. There is no limit to how many times a voter can opt out or opt in to receiving a mail ballot. In some cases, single voters have changed their minds five or six times before a single election. Staff are able to flag the opted out voters in DIMS and attach scanned copies of each mail ballot preference form to the appropriate voter. However, due to some difficulties with DIMS, staff created a separate spreadsheet outside of the DIMS system to keep track of these voters, rather than relying on searches within DIMS prior to sending the

[10] DMV-AVR refers to the Automatic Voter Registration records that come from the interface with the Department of Motor Vehicles.

extracts to the print vendor. It is unclear whether a second staff person conducted quality control for this manual process.

UOCAVA Forms

Uniformed and overseas citizens can request their ballots to be sent by email, fax, or mail by completing a Federal Post Card Application (FPCA) and submitting it to the ROV. They may also use the SOS's Effective Absentee Service for Elections (EASE) website to register to vote and to request, receive, and return their ballot for each election. The EASE system also automatically includes a completed FPCA with the ballot for voters who indicate that they are uniformed or overseas citizens. A voter who registers as a UOCAVA voter must confirm their eligibility every two years.

These forms are saved in two four-inch, three-ring binders, which temporary employees organized in alphabetical order. One of the election specialists is contacting each of the 1,278 UOCAVA voters from 2022 to determine whether they are still eligible to remain as UOCAVA voters for the 2024 election cycle.

Notices

The ROV mails notices to voter registration applicants or registered voters for various reasons involving their eligibility. This includes notices to applicants who did not sign the form, applicants who are under the age of 18, applicants who did not provide proof of citizenship, and cancellation notices. The DIMS program does not automatically generate notices. Instead, an election specialist tasked with this process uses a spreadsheet to track the voter information and the reason(s) for the notices and generates a mail merge for the letters on a weekly basis. Temporary employees scan each mailed notice and attach them to the voter records.

Findings

ROV staff have not been adequately trained on voter registration data entry. They have been working in a heightened emergency environment without being able to take the time to understand how and why certain tasks must be performed. One staff member expressed that she was following the instructions she was given but she did not understand why the steps needed to be done. Without an understanding of the requirements under state and federal law, mistakes could be made that would result in improper registrations, cancellations, or status changes.

ROV staff are delegating too much authority to temporary employees without having sufficient SOPs and without adequately performing quality control checks to determine if the data entry is being performed correctly. At a minimum, temporary employees should be working in pairs with one person checking the data entry of the other for accuracy before passing registration forms and notes to supervisors for the issuance of notices or resolution of issues requiring a permanent staff member's review.

Data entry mistakes can lead to voters who are not properly registered or registered with the wrong party affiliation, ballots mailed to the wrong address or not at all, and many other potential issues. These mistakes can be costly and lead to decreased public confidence in the ROV and in the election processes.

Section 2 - Automatic Voter Registration

Observations

DIMS' limitations cause ROV staff to manually complete many of the tasks related to voter registration. On average, Washoe County receives 200 to 300 records from the Department of Motor Vehicles Automatic Voter Registration program every day. These include updates and new registrants. The time to process these records takes an average of two to three hours per day. Only one election specialist is currently trained on the processes.

An existing manual provides step-by-step instructions for handling the AVR records, but the current staff member who is doing the work has not been trained on why certain steps are necessary. This appears to be caused by the turnover in staff and the lack of vendor support for DIMS. The former department systems specialist was knowledgeable about the nuances of working with DIMS and was in the office when AVR was implemented by the SOS and the DMV. Thus, this person had a better underlying understanding of voter registration laws and procedures, but was unable to convey that information to the election specialist who is currently assigned with these tasks. As a result, this election specialist may not be well equipped to cross-train coworkers. In addition, the member of TS who was most knowledgeable about these processes recently retired from the County. This means that a large amount of institutional knowledge is no longer available and the current staff member working on this task is largely self-taught.

The procedures for processing the AVR records requires the staff member to navigate across multiple screens and to follow precise steps in a specific order. The assigned staff member is frequently interrupted by temporary employees or walk-in customers to the ROV, which means this person sometimes needs to perform tasks repeatedly to ensure that they are done properly. The records transmitted by the DMV are not in the same format as required by DIMS. The staff member processing the records must run several SQL reports to handle the various known issues and then go into each of those records to manually edit the records.

As an example, the DMV will frequently send records where the voters have apartment numbers or unit numbers and the address contains "APT," "UNIT" or the "#" symbol. The election specialist runs a SQL report to search for records with that issue and then has to go into each of those records individually to remove "APT," "UNIT" or "#" from the imported record.

Another issue is that there are many new housing developments being built in Washoe County, but the street file in DIMS has not been updated since the department systems specialist left the ROV.

Numerous records have been added but remain in pending status because their associated addresses need to be added to the street file.

As noted above with respect to the paper voter registration forms, many records require some follow up via a written notice letter. For the records that are awaiting additional information from a voter, they are placed in a “pend” status, which means they are not yet fully registered. These records need to be reviewed on a regular basis to move their status to active (e.g. pre-registrants who have not yet reached the age of 18 when they registered or other registrants who have confirmed citizenship or residence information), to cancel the records as failed applications, or some other appropriate action. Because the DIMS system does not include a flag or other indicator for when a notice has been sent, this means running queries to work through all of the records that are tagged as pending or manually pulling up each record one at a time. In a modern voter registration system like the State-planned VREMS, this work will be much more automated. This work needs to be done regularly so that all eligible voters are able to participate in the next election.

Findings

There are numerous pending registrants that cannot be issued voter registration cards until their residential addresses are added to the street file. This is a tremendous amount of work that needs to be prioritized. Further, because there is a strong likelihood that some of the records within those currently unprocessed records may be multiple submissions for the same person, there needs to be a systematic approach for ensuring that the most recent change for each registrant is processed.

Section 3 - Voter Registration List Maintenance

Observations

Undeliverable Mailings

One of the best ways to ensure the accuracy of voter registration records is to update records based on a voter’s change of address. Under the National Voter Registration Act (NVRA), an election official can make a voter inactive after two official election mailings are returned as undeliverable. After each election in which ballots are mailed to voters, undeliverable ballots that are returned to the office by the USPS constitute official election mailings that can be used as one of the NVRA mailings. The ROV then must review these undeliverable ballots by accessing the voter record for each individually to determine whether the voters can be made inactive or whether a notice (a second official election mailing) must be sent. Because AB321 requires ballots to be mailed to active registered voters, but not to inactive registered voters, it is essential that the ROV have adequate processes to ensure the accuracy of the voter registration database.

After the 2022 Primary Election, the ROV reported 25,586 ballots were returned as undeliverable. It is unknown whether the ROV’s staff had time between the Primary Election and General Election to process these undeliverable ballots. After the 2022 General Election, the ROV reported 14,614

undeliverable ballots. ROV staff stated that they were still engaged in post-election cleanup procedures, which would involve processing these undeliverable ballots. Timely processing of undeliverable election mail is one of the most effective ways to ensure only active, eligible voters receive a mail ballot.

NevValidator

The SOS, as part of its daily work combining the nightly voter registration databases of the 17 counties, compares the lists to each other for duplicates, compares the lists to records from the State's Vital Statistics Office, and compares the lists to records from the State's Department of Corrections. The SOS then provides reports to each of the counties on a daily basis of possible duplicates, deceased voters, and felons that must be checked by County staff. These reports must be downloaded from the SOS's NevValidator system. This system is also used by the counties to review and resolve cross-county provisional ballots by determining whether voters who register using same-day registration have voted in another county.

ROV temporary staff members handle these reports by flagging the voter records that need to have notices issued. It is unclear whether there are any written SOPs for handling these processes. It is also unclear whether the temporary employees have been given login access to the NevValidator system.

ERIC

The State of Nevada is a member of the Electronic Registration Information Center (ERIC) and receives reports of duplicate voter records, deceased persons, in-state moves, and out-of-state moves periodically throughout the year. The SOS receives the reports and then distributes the applicable records to each county. The ROV then researches whether the information provided is accurate and determines whether to send voter notices. For example, if the ERIC report indicates that based on National Change of Address (NCOA) data it appears that a voter no longer lives in Washoe County, the ROV will send that individual a letter (official election mail under NVRA). This mailing starts the clock to switch the voter's status from active to inactive, and eventually to cancel the registration if the voter confirms they moved outside of Washoe or if they do not vote in two consecutive federal General Elections after being sent the NVRA notification.

ROV staff noted a desire for better training and procedures for handling ERIC reports. More training on list maintenance is essential for all of the ROV's staff that manage voter registration records.

Notices

As stated above, the ROV sends notifications to voters and voter registration applications for a variety of issues. DIMS does not have a mechanism for calendaring response deadlines for these notices. This means that if a deadline passes without an answer from the voter, the voter's status may not be changed.

When a voter or applicant responds to a notice or if it is undeliverable, one of the ROV office assistants is tasked with sorting them according to some instructions developed by one of the election specialists.

The temporary employees scan the notice or postcard, attach it to the appropriate voter record in DIMS, and then follow the instructions within the record to update or make a comment.

Precinct and District Updates

As noted above, DIMS utilizes street file indexes rather than GIS for its precinct and district mapping. The ROV reported that there were many precincts in use within DIMS that have no voters assigned and that should be removed or some precincts that only had one or two voters that should be combined or merged with other precincts. In addition, Senate Bill 84 (2021) increased the maximum number of voters in a precinct, but ROV has not had the time or staff available to engage in a reprecincting project. Having fewer precincts would result in fewer ballot styles which would have a domino effect of more efficiency and accuracy during the ballot proofing processes.

It is unclear how often the ROV has confirmed the accuracy of the district boundaries for the commissioner districts, city wards for Reno and Sparks, city boundaries for the other municipalities, and the board of regents districts.

Findings

Similar to the data entry processes, there are significant deficiencies in training and SOPs for list maintenance. Staff minimize list maintenance in favor of other job responsibilities. ROV management needs to prioritize list maintenance because so much depends on an accurate voter registration list. List maintenance activities are essential in jurisdictions that use mail for ballot delivery.

As demonstrated by the numerous public comments during the canvass meetings after the 2022 Primary and General Elections, the residents of Washoe County are dissatisfied with the mail ballot processes. There is a perception that many people who are no longer living in Washoe County – or those who are deceased – are being mailed ballots. The ROV needs to invest significant time and resources in cleaning the voter rolls and communicating regularly to the public that it is doing that work. The ROV staff need to routinely and systematically work to change statuses from active to inactive to canceled, where appropriate under Nevada and federal law. Fully training staff on list maintenance processes and calendaring the applicable deadlines will ensure that the voter registration list is accurate.

Recommendations

There is significant overlap between the job responsibilities for data entry, processing AVR registrations, and list maintenance. The recommendations for all three of the subsections discussed above are combined.

Recommendation 1. Develop improved workflow and SOPs for data entry, automatic voter registration and list maintenance.

This recommendation includes an assessment of the best use of temporary and permanent employees to improve efficiency, accountability, and accuracy in the voter registration data entry processes. The ROV has some guidance documentation, but it is not easy to follow. The permanent and temporary staff would benefit from comprehensive SOPs and job aids in the following areas:

- Processing paper voter registration forms
- Processing mail ballot preference forms and proofing the mail ballot data lists before an election to remove voters who have opted out of receiving a mail ballot
- Handling UOCAVA forms, correspondence with UOCAVA voters, handling UOCAVA and EASE ballot transmissions and transferring them to the mail ballot processing team for duplication and tabulation
- Sending notices (including voter registration cards), tracking deadlines for notices that require a response, and processing responses to notices or failures to timely respond
- Processing automatic voter registrations from the DMV and reports from the SOS through the online web portal
- Performing regular list maintenance by processing failures to respond to notices, undeliverable mail, NevValidator reports and ERIC reports
- Regularly running queries to clean up the voter database and providing regular information to the SOS for monthly statistics reports

The ROV should also consider sending an updated voter registration card to all active registered voters after staff have completed their database cleanup work. Sending the cards is costly, but it will serve as an added check to the accuracy of their voter registration database before mailing ballots for the 2024 Presidential Preference Primary Election.

Recommendation 2. Train and cross-train permanent ROV staff on voter registration.

The current permanent ROV staff have learned on the job how to do most of their tasks but do not have a full understanding of Nevada and federal law regarding voter registration and why good data entry and list maintenance habits are so important. An on-site training with all voter registration staff would help lay that foundation while cross-training would ensure redundancy for these vital job responsibilities. TEG recommends that the staff work in pairs after the training session where the experienced person helps guide the less experienced person in the tasks.

Recommendation 3. Develop and implement a quality control plan for voter registration.

TEG observed that the permanent staff had delegated many of the voter registration tasks to temporary staff, but there was no discussion of quality control on the completed work. Performing regular quality control checks ensures that the voter registration processes are working properly and errors will be discovered and corrected. For example, a supervisor would take a sample of source records (paper

registration forms, AVR, responses to notices) and compare them to the information contained in the voter registration database. If errors are discovered, the ROV will then be in a position to determine whether the processes are working or whether staff need additional training.

If the ROV needs to continue relying on temporary staff to perform some of the voter registration tasks, then a best practice to implement would be to have the temporary employees work in pairs. After each is done with a batch of registrations, they should swap and spot check each other's work.

ROV permanent staff (primarily Election Specialists) should regularly review the work of the Office Assistants and temp staff for accuracy and completion. TEG will develop a quick reference checklist for regular spot checks on the data entry. ROV staff will need to schedule time to perform these spot checks on a weekly basis for one to two months until the team becomes better trained on voter registration processes and can then transition to less frequent checks. In addition, ROV management should develop a strategy for handling repeated deficiencies or errors.

Recommendation 4. Update DIMS street index file.

Ideally, someone with an understanding of how to update the DIMS street file would be able to assist the ROV in creating SOPs specific to managing the street file index so that the work can continue without assistance from TS. The street file is a component of the voter registration system where attention to detail is particularly important. Errors can result in inaccurate district boundaries or voters being assigned to improper precincts and receiving incorrect ballots. The ROV should ensure some redundancy by having at least two staff members know how to make street file changes, but should not allow access to all members of the ROV staff.

The ROV should also regularly engage relevant departments – including the assessor and GIS technical services – to compare the voter database to County property and district assessor records on a regular basis, but at a minimum before each election cycle.

Recommendation 5. Develop a calendar of deadlines and timelines for voter registration activity.

One of the best ways to conduct list maintenance is to develop strong habits in keeping track of notices sent and deadlines for responses. Since DIMS does not have any capability to calendar deadlines, the ROV must have an external calendar and should have a staff member devoted to maintaining the calendar to ensure that deadlines are tracked and met.

Recommendation 6. Use USPS IMB files to automate list maintenance on undeliverable mail.

As noted above in Part 2, Recommendation 5, ROV should incorporate full use of IMBs into its ballot envelope designs. A secondary use for doing so is that the USPS provides downloadable files that can be used to automate list maintenance once a new VREMS has been implemented. This will enable ROV staff to complete post-election list maintenance on undeliverable ballots more efficiently.

Table of Recommendations Part 4. Voter Registration	
Recommendation 1. Develop improved workflow and SOPs for data entry, automatic voter registration and list maintenance.	
TEG Staff On-site Business Process Mapping	See Part 8
TEG Business Mapping Format and Design	See Part 8
Draft SOPs and job aids	See Part 8
Total TEG Hours	See Part 8
Implementation Notes: This need is urgent and will take significant time and input from ROV staff.	
Recommendation 2. Train and cross-train permanent ROV staff on voter registration.	
TEG Staff Remote Consultation and Curriculum Development	40 hours
One day of on-site training with ROV staff	8 hours
Total TEG Hours	48 hours
Implementation Notes: Training could be completed with TEG staff remotely, but the recommendation is for one day of on-site training because it is generally more effective.	
Recommendation 3. Develop and implement a quality control plan for voter registration.	
TEG Staff Remote Consultation and Drafting	20 hours
Total TEG Hours	20 hours
Implementation Notes: Quality control is vital, but is best accomplished after the training and SOPs are in place.	
Recommendation 4. Update DIMS street index file.	
TEG Staff Remote Consultation and Drafting SOPs	4 hours
Total TEG Hours	4 hours
Implementation Notes: TEG staff involvement would be limited to drafting SOPs with the assistance of the staff who perform this street index updating work.	
Recommendation 5. Develop a calendar of deadlines and timelines for voter registration activity.	

TEG Staff Remote Consultation and Drafting	4 hours
Total TEG Hours	4 hours
Implementation Notes: The calendar is only as good as its implementation. ROV will need to identify a staff person whose job is to maintain the calendar and ensure that deadlines are met.	
Recommendation 6. Use USPS IMB files to automate list maintenance on undeliverable mail.	
Total TEG Hours	N/A
Total Estimated Hours	76 hours

Part 5 - Communications and Coordination Externally and Internally

The ROV and County believe they are communicating enough information about elections. Sentiment from external stakeholders is that the ROV and County are failing to communicate adequately. A common refrain we heard from external stakeholders was, “They never take responsibility for mistakes and they never adequately explain mistakes (if they even address them at all).” Observers reported not having enough information to understand the processes.

Referring to the Statement of Work, the following addresses communications and coordination with the Nevada Secretary of State’s office, internal stakeholders, and polling locations, as well as best practices for documenting standard operating procedures (SOPs).

Observations

The ROV operates in an environment with rapidly changing technology, legislation, and public opinion. There is an increased demand for effective external communications including media relations, voter education and outreach, building intergovernmental relationships, and crisis communications. Further, with rapid changes to election information, the ROV’s website requires consistent review to ensure information is current, usable, and accessible.

The fast pace of change and staff turnover requires increased demand and support for training materials, procedural documents, and design and branding materials such as signage.

ROV communications require an in-depth comprehension of election administration, voter services, political landscape, and stakeholder relationships.

Finally, while internal stakeholders (other County offices) generally reported good communication between the departments, formalizing the structure and identification of key departments through written documentation and procedures is needed in planning for the election.

Findings

Improved internal and external communications are critical to increasing effectiveness, efficiency, and confidence in elections for the County and its voters.

Recommendations

Recommendation 1. Hire a full-time public information officer (PIO).

See Recommendation 2 in Part 1: Staffing, Organizational Structure and Training.

Recommendation 2. Develop an ROV voter education and communications plan.

A robust communications plan is necessary to ensure voters and external and internal stakeholders are informed and aware of important dates and deadlines, rights and responsibilities of the voter, and the effort required to successfully administer an election. Creating and posting consistent, accurate and informative content will help election officials build trust and establish themselves as the trusted source of information. A robust communications plan includes regular, scheduled notifications to the public through a variety of channels. TEG has experience developing communications plans for jurisdictions across the country that include public service announcements, social media posts, press releases, and media advisories.

Recommendation 3. Develop an ROV crisis communications plan.

During a crisis or emergency, it is critical for election offices to communicate pertinent information to internal and external stakeholders. The level of detail, urgency and involvement of various individuals and organizations may vary depending on the situation. Knowing the roles and responsibilities for each member of the staff, to whom the information will be communicated, and the method by which that information will be communicated is critical to ensuring the incident is managed appropriately.

Recommendation 4. Update website.

A jurisdiction's website is often the main way that an office will communicate with many voters. Considerations for updates include the following:

- Simplify the navigation menu
- Provide pages for archived information
- Prominently feature upcoming election dates

Recommendation 5. Develop an observer plan and communications resources for observers.

A concern raised by observers was an inability to communicate with ROV staff or receive adequate explanations of processes. An observer plan includes ensuring that observers have the necessary information to understand how the administration of an election is completed. Handouts or demonstrations on the steps necessary to complete a specific task can help observers understand what should be done and whether something is wrong. Having knowledgeable staff nearby in case observers identify an issue or need clarification of something they witnessed is also a critical part of the observer plan.

By being transparent and open with observers, election officials can help to build trust and confidence in the election process. This can help to ensure that the election is seen as legitimate and fair by all stakeholders, including political parties, candidates, and voters.

Recommendation 6. Coordinate regular meetings with all County departments supporting the election; increase meeting frequency as the election gets closer.

Administering a successful election requires a whole-of-government approach. It takes regular communication with other departments such as the sheriff's office, transportation and facilities, as well as USPS. It is critical that all necessary departments are kept up to date on all information pertaining to the election, and the most assured manner to do so is to formalize the working relationships between all of the various departments. The County Manager should call regular meetings – even in non-election years – and these meetings should increase in frequency as the election draws closer. For General Elections, the leadership and key personnel in each department should be meeting at least weekly, if not more often, to coordinate all aspects of the election.

Recommendation 7. Develop a communications plan regarding voter registration.

Multiple stakeholders discussed frustration with voter registration and mail voting processes. To help allay those frustrations, the ROV needs a strong communication plan that explains voter registration and list maintenance practices, invites voters to check and update their voter registration (if needed), and explains the mail ballot preference form and related deadlines. TEG's communications experts will help develop a plan specific to voter registration.

A well-designed web page devoted to voter registration and list maintenance practices should be a necessary component of this communications plan. The ROV already has a large amount of voter registration information on its website, but it could be improved to provide more clarity to voters. Also, it would be helpful to include some statistics such as a monthly recap of new and canceled registrations to demonstrate that the ROV is keeping up with registration and list maintenance. TEG's communications staff will help with improving the website.

Table of Recommendations Part 5. Communications and Coordination Externally and Internally	
Recommendation 1. Hire a full-time public information officer (PIO).	See Part 1
Total TEG Hours	N/A
Recommendation 2. Develop an ROV voter education and communications plan.	
TEG Staff Remote Consultation and Drafting	25 hours
Total TEG Hours	25 hours
Implementation Notes: Immediate need as the start of early voting for the presidential preference primary begins January 27, 2024.	
Recommendation 3. Develop an ROV crisis communications plan.	

TEG Staff Remote Consultation and Drafting	20 hours
Total TEG Hours	20 hours
Implementation Notes: Immediate need as the start of early voting for the presidential preference primary begins January 27, 2024.	
Recommendation 4. Update website.	
TEG Staff Remote Consultation and Drafting	40 hours
Total TEG Hours	40 hours
Implementation Notes: Immediate need as the start of early voting for the presidential preference primary begins January 27, 2024.	
Recommendation 5. Develop an observer plan and communications resources for observers.	
TEG Staff Remote Consultation and Drafting	100 hours
Total TEG Hours	100 hours
Implementation Notes: Short-term need to ensure adequate communication materials are finalized and printed prior to early voting in the presidential preference primary.	
Recommendation 6. Coordinate regular meetings with all County departments supporting the election; increase meeting frequency as the election gets closer.	
TEG Staff Remote Consultation and Drafting	N/A
Total TEG Hours	N/A
Recommendation 7. Develop a communication plan regarding voter registration.	
TEG Staff Remote Consultation and Drafting	8 hours
Total TEG Hours	8 hours
Total Estimated Hours	193 hours

Part 6 - Elections Technology Infrastructure

Many of our findings and recommendations with respect to elections technology are included in the sections above about the business processes these technologies enable. This section is limited in scope to a general discussion of the elections technology infrastructure in the ROV office and outlining support for the staffing recommendation from Part 1 of this report. As such, most of this section will be a high-level review and proposal for improving the security posture of Washoe County and the ROV.

Development of a strategic and collaborative relationship between the ROV, TS and the SOS should be a key priority for the County, especially since a new statewide voter registration and election management system is in the planning stages. With this transition, some daily elections activities will be reliant on state-based software and the need for partnership will increase.

Based on the current market for technical cybersecurity staff, it may be unrealistic to think that Washoe will be able to recruit and/or retain a chief information security officer (CISO), chief technology officer (CTO), or hands-on cybersecurity analyst for a permanent staffing role under the ROV. Washoe could consider recruiting for a position that is less technical but knowledgeable, such as an experienced technical auditor[11] or a security analyst. Alternatively, Washoe could explore opportunities for recruiting a virtual or fractional CISO for on-demand consulting alongside existing ROV staff.

Recommendations

Whether the ROV chooses to dedicate a new or existing staff member to election security, there are several key initiatives the County should consider for prioritization. We briefly touch on these below.

Recommendation 1. Implement a formal election security program area in the ROV.

Since the designation of elections systems as “critical infrastructure” in January 2017, the federal government and other public sector organizations have invested significant resources into helping election officials improve their security. This includes assessing the physical security and cybersecurity postures of state and local election offices. Many local election offices have adopted formal cybersecurity frameworks such as the NIST Cybersecurity Framework or the CIS Critical Controls to assess areas of risk and vulnerability, initiate programs to manage risk, and measure their progress in mitigating those risks. TS may have already adopted a cybersecurity framework for the County, in which case the ROV would benefit from aligning to those standards, guidelines and policies. The key takeaway is that the ROV needs to be an active partner in the County security program. Due to the critical infrastructure designation of election systems, the ROV may be able to obtain no-cost services from state, federal and private sector partners to improve the County’s security.

[11] One appropriate credential for such a resource is a Certified Information Systems Auditor or CISA. This credential is offered through ISACA.

Recommendation 2. Establish a security Task Force between the ROV, TS, and County leadership.

As the ROV commences a formal election security program, it should ensure that they are collaborating with and leveraging existing capabilities of the County. Core cybersecurity practices are today TS's domain, and the ROV should avoid duplication of effort with that County department. At the same time, the combination of physical and cybersecurity aspects of election systems may qualify for expanded services from state and federal partners due to their status as critical infrastructure. A formal task force, whether it is an interim or a permanent body, could enable specific focus and planning between County departments on election security issues. The ROV should commit to having a senior technical staff as a member of the task force to advocate for critical security needs.

Recommendation 3. Develop an improvement plan and actively manage the plan.

Regardless of the starting point of a risk management initiative, there will always be room for improvement. The specific vulnerabilities of technical and physical systems and operational processes will change over time as the threat environment morphs and changes, and as new exploits and areas of strength and weakness develop. The formulation of a formal improvement plan could provide a foundation from which to build a more mature and resilient organization. TS should be an active partner with the ROV in managing risks as they arise and are addressed. The County may consider establishing a service-level agreement (SLA) with TS or with third-party companies to monitor and manage physical and technical assets and minimize risk. The ROV should be seen as a critical stakeholder from a cybersecurity perspective.

Recommendation 4. Begin with the basics.

There are many basic recommendations that can be implemented even before a more formal approach has been initiated. These include:

- Patching and updating of software
- Vulnerability scanning of accessible systems
- Phishing exercises
- Cybersecurity awareness training
- Multi-factor authentication for accounts
- Reviewing data backup schedules and testing backups
- Network segmentation

These all represent a mindset of security awareness and an organizational culture of shared responsibility. These initial activities should include a review of the ROV's incident response plan and the County continuity of operations/continuity of government (COOP/COG) plans with County leadership and TS. With the ROV advocating for a more collaborative role in the overall County's operational planning and preparation, the benefits to the County, its residents and voters of working to support a more transparent and secure elections operation will be apparent.

Section 1 - Electronic Pollbooks

Observations

The current electronic pollbooks in use by the ROV are a homegrown solution developed by a staff member from TS who has recently retired. As with other technological solutions, the ROV is expecting to implement a new vendor-built pollbook solution in time for the 2024 elections.

Findings

ROV staff stated that they intend to purchase twice as many pollbooks as they use now. This would allow them to designate specific units for training, early voting, and Election Day, without the need to reset them during a particular election.

Recommendations

As noted with respect to the implementation of the State VREMS solutions to voter registration and election worker management, there is currently no clear timeline for this pollbook transition to occur.

Recommendation 5: Develop a testing and deployment plan for ensuring that electronic pollbooks (new or existing) will be functional for the 2024 elections.

Recommendation 6: If a new product is implemented, use a project management professional to ensure that testing, training, and implementation is as seamless as possible.

See Recommendation 6 in Part 1: Staffing, Organizational Structure and Training.

Section 2 - Voting Technology

Findings

Washoe County uses Dominion Voting Systems' Democracy Suite for voting and tabulation equipment. Dominion provides adequate customer service by programming each election and frequently visiting for on-site training and maintenance. Because Dominion provides programming services to Washoe and the other 14 Nevada counties that use Dominion, there is a high level of uniformity for the federal, statewide, and legislative candidate contests and statewide ballot measures.

For in-person voting, ROV uses the Imagecast ® X touchscreen Direct Recording Electronic equipment. This equipment uses a card to activate the appropriate ballot style for a voter, which is then displayed on screen. The voter makes their selections and then has an opportunity to confirm their selections by viewing them on the connected VVPAT printer. After early voting and on Election Day, the election workers return to ROV with the thumb drives from each of the devices, which ROV staff then upload into their Democracy Suite software to compile the results.

For the mail ballots, the ROV uses the Imagecast ® Central for central count tabulation of paper ballots. Ballots are scanned on one of five Canon G2140 scanners and the results are transmitted to the Democracy Suite software.

Recommendations

Moving away from the VVPAT printer to a system with the compact laser printer attachment would make it easier for voters to review their selections and help with the post-election risk-limiting audit required by statute. When a ballot cast at a polling place is selected as part of the audit, the ROV staff has to find the correct VVPAT paper roll and manually unroll it to find the designated ballot, which is a time consuming task. Switching to the compact laser printer attachment would enable ROV to scan the polling place ballots at their central count facility and imprint them, which is the same procedure that they use for the mail ballots. This would not be an immediate recommendation, but is something that the ROV might want to consider in the future.

Recommendation 7. The VVPAT system should be evaluated for possible replacement with ballot printers to enhance voter privacy and audit efficiency.

Options in the polling place for ballot printing should be considered that would replace the VVPAT paper tape system. The VVPATs print ballots on thermal paper tape in sequential order of voting that can expose a voter's anonymity. They are also inefficient to audit in comparison to individually printed ballot sheets.

Section 3 - Election Software Platforms and Applications

The ROV employs numerous primary and ancillary systems and platforms to manage business operations. Where they were previously discussed in detail the section and page references are provided. Where there is additional information, or where they were not discussed in depth previously, information is added here.

Observations

The ROV reported that the staff needed training on Microsoft Word, Outlook and Excel. The office also reported issues with document management and version control. The staff use Teams for some communication, but are not effectively using it for project management.

Findings

The ROV elections software inventory includes:

- DIMS - Voter Registration and Election Management Tool

    - Status: In use but being phased out when the SOS purchases and implements Total Vote VREMS
- PollChief - Election Worker Management Tool
    - Status: In Use but likely being phased out
- Website Information Tool - Supported in-house
    - Status: The website is maintained jointly by ROV and the County communications team. The ROV is currently responsible for maintaining or updating the website but will shift this responsibility to the department systems specialists.
- Election Night Results
    - Status: During an election, the County uses a County-built website to display election results. After the canvass, the summary report from Dominion is posted to the ROV's results web page.
- Microsoft Suite of Tools
    - Status: In permanent use and kept up to date by TS

Recommendations

Recommendation 8. Have staff attend training on Microsoft 365.

The ROV stated that the County offers opportunities for County employees to attend training on the Microsoft 365 suite of products.

Recommendation 9. Develop SOPs for document management.

The ROV mentioned several times that documents went missing on the network drive and that there was a lack in naming conventions for saving documents and creating folders. Creating SOPs for uniform naming conventions for saving files and creating folders and subfolders that all of the ROV staff use will result in improved efficiencies in many of the office's tasks.

Table of Recommendations Part 6. Elections Technology Infrastructure	
Recommendation 1. Implement a formal election security program area in the ROV.	
Total TEG Hours	No TEG Cost
Recommendation 2. Establish a security Task Force between the ROV, TS, and County leadership.	
Total TEG Hours	No TEG Cost
Recommendation 3. Develop an improvement plan and actively manage the plan.	

Total TEG Hours	No TEG Cost
Recommendation 4. Begin with the basics.	
Total TEG Hours	No TEG Cost
Recommendation 5: Develop a testing and deployment plan for ensuring that electronic pollbooks (new or existing) will be functional for the 2024 elections.	
Total TEG Hours	50 hours
Recommendation 6: If a new product is implemented, use a project management professional to ensure that testing, training, and implementation is as seamless as possible.	
Total TEG Hours	See Part 1
Recommendation 7. The VVPAT system should be evaluated for possible replacement with ballot printers to enhance voter privacy and audit efficiency.	
Total TEG Hours	N/A
Recommendation 8. Have staff attend training on Microsoft 365.	
Total TEG Hours	N/A
Recommendation 9. Develop SOPs for document management.	
Total TEG Hours	See Part 8
Total Estimated Hours	50 Hours

Part 7 - Space

Section 1 - Elections Operations Space: Warehouses and Ballot Processing Room

Observations

Warehouses

The ROV needs consolidated space for storage rather than the two warehouse spaces it has for a portion of the operations facility. Delivery trucks for deployment make two stops for loading and unloading. This space is used for equipment and supply storage, equipment programming and testing, logistics planning, and deployment of equipment and supplies for vote centers. A moving company is used to deliver election equipment and supplies.

The staff has worked to organize and document some inventory in these spaces to improve efficiency; however, the ROV urgently needs a comprehensive inventory management system. There are some assets that are barcoded using a system for checking in mail ballots at the polling locations, but the limited use of that system is inaccurate, outdated and no longer in use for this purpose. They are not getting all supplies back on election night. PollChief offers an inventory tracking module, which the ROV could explore.

The warehouse is secured by keyed locks and an alarm system. An upgraded badge access system and additional security cameras for visibility are planned for implementation in a few months, and they are portable to a new facility. The badge access system needs a credentialing procedure. There is not sufficient space for consolidation of storage and operational processes. The current space is inadequate for efficient election equipment and supplies received on election night. Since the operations for ballot processing are separated, it is not a consideration. Election night receiving operations are conducted at the ROV main office ballot processing room (back room), which is insufficient for continuity of operations in ballot processing and counting.

Ballot Processing Center

Voter registration and participation in elections is increasing but the operational space has not been increased to keep pace with the demand.

The ROV must suspend mail ballot processing on election night at 7 p.m. in order to conduct polling place ballot receiving and tally room activities. This is due to staffing as well as completely inadequate

space to have a continuity of operations. Efficient and consistent election night results reporting is critical to high voter confidence and trust.

The ballot processing area contains multiple operational spaces including ballot receiving, ballot processing (verification, opening, imprint/scan, audit), mail ballot call center, ballot storage, and election tally room.

Staff has organized the space with great thought given the space constrictions, and is driven by the current operational procedures and equipment. Ballot trays are labeled, color coded, and stored in stages. However, ballots, trays and personnel criss cross paths in multiple stages for processing, and cannot follow a consistent and single physical processing path due to space limitations and process redundancies.

The processing center has good coverage for security cameras. Physical security practices (worker sign in sheets, badge stickers) are in place. The large room has keyed locks. A locked cage stores ballots overnight. The tally room requires badge card access and sign in; however, physical sign-in is inadequate and should be augmented to include a security camera inside the tally room. Improvements to physical access to the room and secure areas are needed.

There are three different call centers (311 support, election worker/vote center, and mail ballot). The ballot processing back room has call center stations for mail ballot questions. With appropriate tools and training, these call centers could be consolidated in function with possible space savings.

Future improvements in technology and standard operating systems may provide space efficiency. This includes sorter/VREMS technology and consolidation of imprinting and scanning. However, there is an urgent need for additional dedicated space for duplication, UOCAVA/disability and ballot cure administration, ballot extraction, and ballot transport.

Space for public election observers in the ballot processing room is enclosed in a windowed space. There is not adequate space to provide closer observation and secure the process.There are live-feed monitors for camera views of hard-to-view areas; however, additional space and redesign would provide opportunities for improvement in substantive viewing for public observation (see Section 2 of this part as well as Parts 1 and 2 of this report).

The tally room has an observer window that is accessible via the front counter. It has a separation with a counter space between the observers and the window.

Because the warehouse operational space is located in two separate buildings, observers commented that the separate and siloed locations were frustrating for observation.

Findings

The Washoe ROV elections operations spaces (warehouses and ballot processing room) are inadequate and have not kept pace with the rise in registered voters and increased voter participation and turnout. There is an urgent need for a larger and consolidated operations facility that is adequate for their operations. A single consolidated election operational facility will increase efficiency in processing and security, enhance staff collaboration, and provide continuity of operations.

Recommendations

Recommendation 1. Conduct a detailed space evaluation and redesign for a single consolidated elections operations center to accommodate voter demand, improved public observation, and more efficient and timely election administration.

A consolidated, open, and flexible elections operations center will enable a single location for all operations. This will enhance efficiency, security, and provide a flexible and nimble space for change. A consolidated and adequate space will provide urgently needed continuity of operations that will allow for more efficient process flow and a more timely Election Night tally.

A larger consolidated space will support best practices in election security protocols. It will enhance organizational teamwork and continuity for cross-training and redundancy in personnel.

A larger and consolidated space will provide the needed space to improve substantive and transparent public observation elections activities.

Recommendation 2: Consider immediate and short-term space changes to improve ballot processing.

In Part 2, there are recommendations for ballot processing that will influence space redesign for the current ballot processing room. A space redesign analysis should be conducted in context of the process recommendations. For example:

- Examine the physical path of the ballot processing and determine space needs for ballot tray transportation via a roller cart system. Consolidating imprinting and scanning technology will free up space in the area for larger workstations that are needed.
- Conduct a process mapping of the call centers, analyzing the potential for consolidation of the three operations. Develop consolidated and comprehensive call center training and guides. Consider using the mail ballot call center space to expand space for ballot extraction.
- Establish a dedicated workspace for administration and storage of UOVACA/Disability, duplication, and cure ballots.
- Improve inventory management by either investing in a new inventory management system, upgrading the PollChief contract to include inventory management capability or working with a different provider to develop a more tailored in-house system.

Section 2 - Observer Space

Observations

Mail ballot processing occurs in a secure workspace directly behind the ROV office. The public has access through an observer area – a small room with large glass panels. The room has a separate outside entrance so the public can observe but not access the workspace.

Many community stakeholders discussed the observer space during interviews, raising concerns that they could not meaningfully observe the process. They explained many processes occurred a considerable distance from the windows. They identified physical obstructions to sight lines such as support columns. If they had questions or concerns, no staff was available to talk with them. They had to leave the space and walk to the main office to talk to staff.

Staff has improved access by adding monitors connected to cameras throughout the workspace. Observers can view the monitors to more closely watch work being done throughout the space.

State law does not require pre-registration or third-party authorization for observers. As a result, ROV staff are unable to meaningfully plan to accommodate observers because they do not know how many observers plan to attend.

Findings

Transparency is a core value of election administration. Nevada regulations require the ROV to allow public observation of mail ballot handling, but lack specificity on how to accommodate observers. Washoe County provides observers visual access to the mail ballot process through a windowed room with a separate entrance. Observers have found that distance, physical obstructions, and the lack of staff liaison has diminished their ability to meaningfully observe the process.

Recommendations

Recommendation 3. Incorporate transparency and public observation as a guiding principle of any spatial redesign.

In order to best accommodate observers during the election processes, TEG recommends that a small team of stakeholders, such as observers or political party representatives, be brought into the discussions for redesigning the central count and receiving areas. The areas of interest are signature verification, ballot duplication and adjudication, tabulation, and receiving. In addition to providing good opportunities for observation, the ROV should include explanatory signs and posters for each of the election processes.

Table of Recommendations Part 7. Space	
Recommendation 1. Conduct a detailed space evaluation and redesign for a single consolidated elections operations center to accommodate voter demand, improved public observation, and more efficient and timely election administration.	
Total TEG Hours	40 hours
Recommendation 2: Consider immediate and short-term space changes to improve ballot processing.	
Total TEG Hours	20 hours
Recommendation 3. Incorporate transparency and public observation as a guiding principle of any spatial redesign.	
Total TEG Hours	N/A
Total Estimated Hours	60 hours

Part 8 - Standard Operating Procedures

Observation

Throughout the report, TEG has highlighted areas where there are deficiencies in documentation of SOPs. Election administration is complex. Nearly every election operation depends on multiple staff members completing multiple tasks. No matter how large the staff, there are many procedures that must be completed in a specific manner to ensure compliance, consistency, accuracy and efficiency. Further, many offices rely on new and temporary employees at critical times, such as just before an election, when the training time and resources to onboard these employees are limited.

Similar to the election worker manuals built to support administration of the voting process during early voting and on Election Day, SOPs support the administration of every task in preparing for and conducting an election.

Effective SOPs provide a foundation for most of the procedures you engage in before, during and after an election. SOPs allow you not only to achieve a consistent work product, but also to identify the parts of processes that are working well and those needing improvement. SOPs allow you to create a program that is strategic, repeatable and flexible.

Well-crafted SOPs allow the office to memorialize and make repeatable tasks that excellent employees frequently do from muscle memory. Without SOPs, work done from memory can lead to the organization having a single point of failure. An organization will reduce its risk and enable operational consistency when practices are documented and based on the refined knowledge of the organization, not any one individual.

Developing SOPs is crucial for an elections office for several reasons:

1. Consistency: Internal procedural and training manuals ensure that everyone in the elections office is following the same procedures and protocols. This helps to ensure that the election process is consistent and fair for all voters.
2. Accuracy: Procedures outlined in the manuals can help ensure accuracy in the election process. Clear guidelines and protocols can help prevent mistakes and errors, which can be especially important in a high-stakes election.
3. Accountability: Having documented procedures and protocols can help ensure that all staff members are held accountable for their actions. If a mistake is made or a problem occurs, procedure manuals can be used to determine where the breakdown occurred and who is responsible.
4. Training: SOPs provide a structured framework for training new staff members. They can be used to train new employees quickly and effectively, ensuring that they understand their role and responsibilities within the elections office.

5. Continuity: SOPs can also help ensure continuity in the elections office. If a staff member leaves, the manuals can be used to train a replacement, ensuring that the election process continues without interruption.
6. Compliance: Documenting procedures helps facilitate legal review of office procedures against the state's election statutes and administrative code. Referencing the law in your procedures can help staff differentiate between internal practices and legal requirements.

Overall, the development of internal procedural and training manuals is essential for ensuring the integrity and fairness of the election process.

Findings

In nearly every single instance of important processes or tasks, we found a lack of documented SOPs. This is partly due to the office being under-resourced, which did not allow time for staff to draft and regularly update SOPs for each process carried out through the entire election cycle. The office is going to continue to experience challenges until sufficient SOPs are drafted and a plan for regularly testing and updating the SOPs is initiated.

Recommendations

Below is a table of SOPs we recommend be drafted before the end of 2023 to ensure smooth elections in 2024 along with the estimated time for TEG to draft, train, and test with ROV staff.

Table of Recommendations Part 8. SOPs	
SOP 1. Ballot Development and Proofing	
TEG staff remote business process mapping	40 hours
TEG business mapping format and design	20 hours
Draft SOPs and job aids	100 hours
Total TEG Hours	160 hours
Implementation Notes: These SOPs include creating a master document for all districts and offices, with terms of office, number of seats, and expected election dates. These SOPs will also govern the processes for each election for gathering and organizing the source documents to ensure that contests and candidates are added to the ballot correctly. They also include detailed checklists and procedures for proofing ballots.	
SOP 2. Mail Ballot Production	
TEG staff remote business process mapping	20 hours

TEG business mapping format and design	20 hours
Draft SOPs and job aids	60 hours
Total TEG Hours	100 hours
Implementation Notes: These SOPs include working with the mail ballot vendor and the USPS to ensure timely delivery of ballots to voters and processing and validation of the data extract.	
SOP 3. Two-tiered Signature Verification	
TEG staff remote business process mapping	20 hours
TEG business mapping format and design	20 hours
Draft SOPs and job aids	40 hours
Total TEG Hours	80 hours
SOP 4. Ballot Collection Security	
TEG staff remote business process mapping	10 hours
TEG business mapping format and design	10 hours
Draft SOPs and job aids	20 hours
Total TEG Hours	40 hours
SOP 5. Ballot Duplication and Adjudication Process	
TEG staff remote business process mapping	10 hours
TEG business mapping format and design	10 hours
Draft SOPs and job aids	20 hours
Total TEG Hours	40 hours
SOP 6. UOCAVA/Disability and Ballot Cure	
TEG staff remote business process mapping	40 hours
TEG business mapping format and design	20 hours
Draft SOPs and job aids	20 hours
Total TEG Hours	80 hours
SOP 7. Voter Facing Ballot Tracking and Cure	

TEG staff remote business process mapping	40 hours
TEG business mapping format and design	20 hours
Draft SOPs and job aids	20 hours
Total TEG Hours	80 hours
SOP 8. In-Bound Mail Ballot Processing	
TEG staff remote business process mapping	40 hours
TEG business mapping format and design	20 hours
Draft SOPs and job aids	160 hours
Total TEG Hours	220 hours
Implementation notes: These SOPs include retrieval of ballots from USPS and ballot drop boxes, tracking ballots, sorting, signature verification, signature cure, reconciliation and batch management, ballot envelope opening and extraction.	
SOP 9. Tabulation	
TEG staff remote business process mapping	40 hours
TEG business mapping format and design	20 hours
Draft SOPs and job aids	100 hours
Total TEG Hours	160 hours
Implementation Notes: These SOPs include receiving ballots and memory cards on election night, duplication, adjudication, imprinting and scanning ballots at central count, results reporting, and pre-certification audits.	
SOP 10. Election Worker Recruitment, Management and Training	
TEG staff remote business process mapping	40 hours
TEG business mapping format and design	20 hours
Draft SOPs and job aids	160 hours
Total TEG Hours	220 hours
Implementation Notes: These SOPs include a reorganization of the training manual as well as procedures for recruiting and retaining all of the election workers, including traditional election workers at the vote centers, but also the temporary workers and County employees who assist during the election with mail ballot processing.	

SOP 11. Voter Registration and List Maintenance	
TEG staff on-site business process mapping	40 hours
TEG business mapping format and design	20 hours
Draft SOPs and job aids	160 hours
Total TEG Hours	220 hours
Implementation Notes: These SOPs include paper and online applications, updates, notices, status changes, street file maintenance, checking district and precinct boundaries, list maintenance, and validating voter assignments.	
SOP 12. Document Management	
TEG staff remote business process mapping	10 hours
TEG business mapping format and design	10 hours
Draft SOPs and job aids	20 hours
Total TEG Hours	40 hours
Total Hours Estimate for SOPs	1,440 hours