

This document is one in a series created as part of the Cybersecurity and Infrastructure Security Agency (CISA) Elections Infrastructure Government Coordinating Council and Subsector Coordinating Council's Joint COVID Working Group. These documents provide guidance for state, local, tribal, and territorial election officials on how to administer and secure election infrastructure in light of the COVID-19 epidemic.

Helping Voters to Request a Mail-in Ballot

Overview

A process to help voters apply to vote by mail by sending them an application or by building an online request tool should be put into motion as early as possible before an election. The following questions and answers seek to help election officials implementing expanded vote by mail application processes.

Will you mail an application to everyone or will the application be available only to those who look for it?

If you are simply making the application available but are sending no directed mail, you should consider making arrangements for extensive public messaging and outreach to apprise voters of the application process. More information on these publicity campaigns is available in another document in this collection.

Some contracts will need to change, and you may need new ones—how do you manage that?

Work with your Purchasing Department to determine whether your state or local government participates in a cooperative purchasing alliance, or you can take advantage of a [cooperative contract](#). A similar option would be the [GSA Cooperative Purchasing Program](#). Check whether your vendor is an approved industry partner in this program. Given the circumstances dictating these late changes, your purchasing departments may have additional flexibility.

- Detail all existing vote by mail contracts in a single place, listing the existing terms.
- Hold meetings now with your government partners that can help you modify existing contracts and help you negotiate new contracts quickly.
- Move quickly to define the specifications you will need in new or modified vendor relationships.

- Within the confines of your procurement requirements, begin work with your vendors as soon as possible.

USPS is a critical partner. How do you manage that relationship successfully?

USPS divides the country into regions, and each region has an election lead and supporting staff. Using your region-specific teams will be helpful. Include USPS managers from both your outgoing and incoming post office facilities (may be different).

- Establish a relationship between your office and the USPS now by determining your local representative and meeting with him or her now.
- Report problems to your regional manager and electionmail.org.
- See *Other Resources* section below for details.

How can USPS help you?

The USPS has Mail Piece Design analysts, who are responsible for reviewing election mail and to confirm that it meets all requirements for automation. Even when you use design template work done by groups such as the Center for Civic Design, you need to get approval from USPS.

USPS offers different rates based on class of service, volume, and various other criteria. Different classes of service offer different service standards and have different requirements. For example, First Class has Delivery in 3–5 days; Marketing Class has Delivery in 3–10 days. Engage your USPS team to:

- Get assistance with envelope design and approval.
- Meet about postage rates and strategy because there are major cost savings available if you can use non-profit status (depending on your mailing deadlines).
- Discuss time frames for running voter addresses through CASS certification and NCOA.
- Discuss use of Intelligent Mail Barcodes (IMB). See the *Other Resources* and sections below for more details.
- Discuss process for sharing and fixing problems with delivery and receipt.
- If you use a mailing vendor, confirm your envelope design with them to make sure it works with their mail packet insertion process. Your mail piece will still need to be compliant with USPS standards, but small adjustments can make a big difference in processing efficiencies—less waste from damaged envelopes, etc.
- Try to include ballot-specific Service Type Identifier (STID), a unique three-digit code that indicates the service type for an individual mailpiece, in the mail barcode.
- For election mail, always use green 191 tray tags for your mail trays.
- See *Other Resources* below for specifics.

What are some important considerations when designing a paper mail-in ballot request form and direct mail program?

The level of voter-specific targeting and the design will affect whether and to what degree voters decide to request a mail-in ballot. Election officials must make critical decisions, including whether to use preprinted forms or blank applications and/or whether the application should be included with another mailing such as a sample ballot, election notice, or other non-election mailings (such as tax notices).

- Maximize the degree of specific voter targeting.
 - Consider using preprinted forms with barcodes to eliminate backend manual data entry in preference to using blank forms embedded in another mailing such as a sample ballot or election notice.
- Choose a mailing style. Should the mailing be a postcard or letter? Should the application be included with another mailing?
 - Be sure to consider the privacy consideration if voter data may be exposed.
- Use best practices to design the application. See *Other Resources* below.
- Consider language needs—do you need to provide the application in multiple languages?
- Can the form serve multiple purposes—a voter registration address update for example, or a new registration?
- Choose an effective outbound envelope design. Your choice can affect whether voters open it and what price you pay for postage.

Are there other ways to make the mailing most effective?

- Time the mailing appropriately. Send the applications far enough in advance of the election to get applications back as soon as possible while recognizing that more voters will interact with the mailing as the election approaches, perhaps 60 days in advance.
- If your state has multiple elections remaining this year, consider sending one absentee ballot application for your jurisdiction and giving the voter the option to opt-in to a mail ballot for multiple elections, which could save you money on mailings and provide a better sense of the needs for the November election.
- Consider whether the mailing can serve multiple purposes such as address updates or registration.
- Coordinate your mailing with USPS. If you are putting a large volume of mail pieces into the stream on one day, work with your district coordinator to ensure that USPS can accommodate that without any delays.

With lots of new requests coming in, how can you successfully manage the volume?

The best option to manage incoming volume is to build an online request tool to push the work to the voters. Another best practice is to mail the preprinted and barcoded form to voters so that the responses can be scanned, and data entry minimized or eliminated.

To accommodate additional paper volume coming into your office:

- Do not just use the same process you have always used. Create a thoughtful and detailed workflow that makes the paper-handling process as efficient as possible.
 - Be sure to account for every piece through its lifecycle, from receipt through data entry. This will involve batching and tracking.
 - Plan for extensive manual work, not just data entry but also date-stamping, opening, and scanning.
 - Think about signature capture or comparison, where applicable, especially if your voter registration database has a lot of voters with missing or old signatures.
- Try to build an efficient process for resolving or “curing” incomplete and invalid applications by incorporating flags into the database that can generate letters or emails automatically—similar to the communications process when ballot envelopes are not signed or have deficiencies.
- Plan for maintaining a paper handling and data entry labor force.
- Consider your additional paper storage requirements—do you need to save hard copies of each application, and if so, for how long?

If you are considering adding an online mail ballot request interface to your website, what should you think about?

Allowing voters to request their ballots online removes much of the need for manual data entry in the election’s office and some of the USPS involvement. Considerations include:

- If online voter registration is allowed at the state level, can that computer code be used as a base for the mail in ballot request system?
 - If so, can the ballot request be added to the online voter registration form?
- If you build a standalone system external to the statewide system, how will the collected data be transferred to the voter registration database(s).
- Are there election-related application services or services in other departments that could be used as a model?
- For bottom-up states, can the transfer of application data be managed safely from the state to the local jurisdiction?
- How do you authenticate a voter in lieu of a signature if that is normal practice? Some options include:

- Driver's license number or issue date
- Last four digits of SSN
- Email address with confirmation required
- First, Last, date of birth, address

In addition, adding this application module is an IT project. General IT project considerations include:

- Do you have an existing internal IT resource, or do you outsource these services?
- Is your existing relationship with your internal/external IT resources conducive to a successful project such as this?
- Do they have the capacity?
- Are they already occupied with other response efforts? Can or should they be diverted?
- How much time will it take to build, test, and deploy a new system? Work back from the date you will start accepting digital applications to build your timeframe.
- Does the state have a certification process that could affect the timeline?
- What is the cost to add this module?
- If you are using a vendor, can it support multiple customers making this same request?

What should your jurisdiction consider if a signature is required on the application?

- Can you allow voters to sign electronically using a software signing tool akin to DocuSign or even signing on a tablet?
- Can you offer voters additional ways to sign, including allowing them to attach a document such as a photographed signature or a copy of their driver's license?
- Can voters print, sign, scan, and upload the application image?

Is there another way to build an application without building a large connected system?

A fillable PDF hosted on your website is a potential alternative. In this case, the data can be extracted and imported into a table inside of the voter registration database, to be matched up with the paper form when it arrives. This approach requires manual work but eliminates many of the keystrokes.

How do you keep in touch with voters throughout the application process?

Consider mandating an email address for online requests or capturing a cell phone number. Make sure you understand whether email addresses submitted on an application will become part of an individual's voter record that will be released to candidates and campaigns.

See the forthcoming guidance document on outreach and education for more information.

What cybersecurity measures should be considered?

Using technology always comes with cybersecurity concerns. Those concerns are exacerbated when individualized data are captured.

- Prevent automated changes/requests (CAPTCHA, etc.).
- Monitor for multiple changes from the same IP address or within the same session—this could occur with voter registration drives or multiple requests from a single family but try and make sure the changes are coming through at human speed not machine speed.
- Monitor for pace of changes; be aware that bad actors might try to leverage easy online processes to make malicious changes and cause chaos.
- Provide a means for individuals to receive a receipt (email, postal mail) to confirm their own changes; this notification channel also can provide early warning of non-voter-initiated changes.
- Monitor that only allowed traffic is permitted to access your online channels; if you are using application programming interfaces (APIs) for data exchanges, monitor, manage, and secure access to the APIs.
- Consider geographic blocks but also understand that UOCAVA voters may be located in adversary nations; provide specific advice to those legitimate voters who will get caught up in this situation (TOR, proxy, VPN to another country, etc.).
- Strongly consider using a web application firewall (WAF).
- Use a dot-gov name to make domain squatting more difficult; reserve your name early and contact name reputation services to have them categorize your site appropriately as official.
- Do not echo back to the users the sensitive information you gather from them in order to validate them. This includes individual name elements, full date of birth, driver's license number, SSN or last 4 SSN, residence information (house number, zip, etc.), issue date of driver's license.
- Information displayed to the user should be only public-domain information, so you do not become an enabler for bad actors to gather more personal information than they already have.
- Use secure coding and consider resources from OWASP or NIST to help prevent SQLi attacks if it's a web form,

- ❑ Use HTTPS
- ❑ Enroll in CISA CyHy, EI-ISAC VMP, CISA RPT, RVA; stay on top of patches.
- ❑ Sign up for CISA services, such as vulnerability scans (aka CyHy), remote penetration testing (RPT), phishing campaign assessment, etc. All CISA services can be located in the [CISA Election Infrastructure Security Resource Guide](#). All services can be requested at CISACustomerService@cisa.dhs.gov.

Other Resources

- ❑ USPS 2020 Official Election Mail Kit (<https://about.usps.com/kits/kit600.pdf>)
- ❑ USPS 2020 State and Local Election Mail - Users Guide—The checklist on page 16 may be particularly important for localities handling mailing in house.
https://trustthevote.org/wp-content/uploads/2020/03/Checklist_VBM.pdf
- ❑ OSET Institute Recommendation for Online Voter Registration Systems
(https://static1.squarespace.com/static/528d46a2e4b059766439fa8b/t/5ae0ed8b562fa74f9c68b2ba/1524690319644/OSET_OVR-RefArchitecture_Feb18.pdf)
- ❑ Center for Civic Design Recommendations for Scaling Up Vote By Mail -
<https://civicdesign.org/tool-kit-for-scaling-up-vbm/>
- ❑ CISA provides remote workforce resources at <https://www.us-cert.gov/ncas/alerts/aa20-073a>
- ❑ National Association of State Procurement Officials (NASPO) Cooperative Contracting Information
(https://www.naspo.org/dnn/portals/16/documents/Cooperative_Purchasing0410update.pdf)
- ❑ US General Services Administration (GSA) Cooperative Purchasing Program.
(<https://www.gsa.gov/buying-selling/purchasing-programs/gsa-schedules/schedule-buyers/state-and-local-governments/cooperative-purchasing>)