



COUNTY OF INYO, STATE OF CALIFORNIA
KAMMI FOOTE, CLERK-RECORDER, REGISTRAR OF VOTERS

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July 2, 2018

Little Hoover Commission
925 L Street, Suite 805
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Dear Honorable Commissioners,

Thank you for your invitation to testify regarding voting equipment security. Following, please find my written responses to your specific inquiries in your letter dated May 24, 2018:

- **Please provide a succinct overview of your responsibilities as the Clerk-Recorder and Registrar of Inyo County. How many registered voters are there in Inyo County and what are your duties in administering elections? What staff and budget do you have to support you in these activities? How much funding do you receive from the state and federal government to help administer elections?**

The Inyo County Clerk-Recorder is an elected official and serves as the Registrar of Voters for Inyo County. The Clerk-Recorder delivers services to people at a multitude of important junctures in life and has organized programs to meet those demands and mandated responsibilities. The Inyo County Clerk-Recorder's office consists of three departments:

Elections Division - includes administering and conducting all federal, state, county, school and special district elections in Inyo County; promoting and encouraging voter registration; processing and certifying initiative referendum, recall and candidate nomination petitions; providing vote-by-mail balloting services; procure the use of polling places that are accessible to the elderly and disabled voters; recruiting, appointing and training poll workers; programming/testing ballot counting systems; provide advice and assistance to governmental entities and individuals regarding election processes; tallying/certifying election ballots; conducting the official canvass of the vote and recounts thereof; and maintain records and indices for public use. The County Clerk-Recorder is also the official filing officer for campaign disclosures and statements of economic interests as required by state and local laws.

County Clerk Division - Files/registers Fictitious Business Names Statements, Notary Public Oaths/Bonds, Process Server Oaths/Bonds, Unlawful Detainer Assistant Oaths/Bonds, Legal Document Assistant Oath/Bonds, Professional Photocopiers Oaths/Bonds, Loyalty Oaths for County Employees, Environmental Documents required by CEQA, Power of Attorney for Admitted Sureties, Disclosures required by County Ordinance, Grand Jury Reports, and other public notices. As Commission of Civil Marriages, the County Clerk also issues Marriage Licenses, performs and deputizes citizens to perform civil marriage ceremonies.

County Recorder Division - Reviews documents and maps presented for sufficiency and recordability, calculates the amount of fees and taxes due and once recorded maintains the

records permanently; Provides facilities for public research and copies as requested. As the Registrar of Vital Statistics, the Recorder examines birth, death and marriage certificates when delivered, scans and indexes same, and provides certified copies to the public upon request as allowed by law.

Inyo County is the second largest county in California, consisting of 10,140 square miles. However, it has one of the smallest populations in California with an estimated population of 18,467 residents and approximately 10,000 registered voters.

The Inyo County elections department conducts all federal, state, county, municipal and district elections. In Inyo County, there are currently seventeen special districts, six school districts, two hospital districts, one community college district, one resource conservation district and one incorporated city with elected board members.

There are 68 regular voting precincts that are consolidated into an average of fifteen in-person polling place precincts and six vote-by-mail precincts. To comply with the Help America Vote Act mandate of providing accessible voting units in all precincts, two touch-screen ballot marking devices are deployed to each voting location, prior to every election. Inyo County has not yet made a commitment to adopt SB 450 – the Voter’s Choice Act - but was one of fourteen California Counties that was authorized to adopt a Vote Center Model in 2018.

The Inyo County Clerk-Recorder’s office has three full-time equivalent staff positions, in addition to the elected department head.

The department maintains three annual budgets of a combined \$500,000, of which approximately \$60,000 is allocated for election operations annually.

Prior to the suspension of election mandates in 2011, the State of California reimbursed the County of Inyo for election mandated activities through the SB 90 process. However, since 2011, neither the State of California, nor the Federal Government pays for any portion of the cost to administer elections.

- **What are the voting equipment security issues you encounter when administering elections? Please describe any cybersecurity challenges as well as any physical security challenges in the deployment of election equipment and oversight of election procedures in an area the size of Inyo County.**

Inyo County elections currently experiences cyber-security challenges through our website, through phishing attacks and from interactions with VoteCal - the statewide voter registration database. The county has taken steps to secure our cyber-services, but has no way to independently verify the veracity of the information imported through VoteCal or received through the Department of Motor Vehicles.

Physical security challenges include lack of controlled physical location, no security cameras and inadequate working space. Most of this is due to the location of the elections department in the

historic courthouse, located at 168 N. Edwards Street, Independence. Lack of funding is also a contributing factor.

- **Please describe for the Commission how you stay informed about security issues. How much support does the state provide you in responding to security challenges?**

Prior to 2016, the cyber-security protections in Inyo County consisted of:

1. The voting system was never connected to the internet.
2. An air-gap computer scanned all devices prior to connecting them to the voting system.
3. The county had a robust firewall designed to block unauthorized access to our personal computers and servers.

After 2016, Inyo County has:

1. Purchased a new voting system that is wi-fi disabled, has an air-gap and is not connected to the internet.
2. Joined the Multi-State Information Security & Analysis Center (MS-ISAC) and the Election Infrastructure Information Security & Analysis Center (EI-ISAC).
3. Contracted with the Department of Homeland Security (DHS) to receive their no-cost services which include: a Cyber-Hygiene Vulnerability Scan, a Risk and Vulnerability Assessment and a Phishing Campaign Assessment.
4. Initiated the process of purchasing “Albert”, which is a network monitoring solution that provides automated alerts on both traditional and advanced network threats.
5. Upgraded the elections website from http to https
6. Completed an on-line cyber-security course
7. Began the process to secure funding to enhance our physical security.

Neither the State of California, nor the Federal Government has provided funding for any of the activities listed above. However, the Federal Government is providing DHS services to counties at no cost.

The California Secretary of State’s office has provided counties with the following information:

- (1) The Belfer Center’s State and Local Election Cybersecurity Playbook and Communications Guides - The Belfer Center for Science and International Affairs is the hub of Harvard Kennedy School's research, teaching, and training in international security and diplomacy, environmental and resource issues, and science and technology policy. The Belfer Center established the Defending Digital Democracy Project (D3P) in July 2017 with one goal: to help defend democratic elections from cyber attacks and information operations. D3P is a bipartisan team of cyber security, political, and policy experts from the public and private sectors. Recently, they released a set of three guides designed to be used together by election administrators: “The State and Local Election Cybersecurity Playbook,” “The Election Cyber Incident Communications Coordination Guide,” and “The Election Incident Communications Plan Template.” These are great

resources and we encourage you to review each of them. All three can be found here: <https://www.belfercenter.org/publication/defending-digital-democracy-releases-new-playbooks-states-counter-election-cyberattacks>.

- (2) Center for Internet Security (CIS) Handbook for Elections Infrastructure Security - Another useful tool is the CIS Handbook for Elections Infrastructure Security. Not only does this resource provide comprehensive technical advice, but it includes a checklist/worksheet to mark your progress (or to be able to mark the progress of your county information security officer or IT department). CIS is a non-profit entity whose purpose is to safeguard private and public organizations against cyber threats. CIS is home to the Multi-State Information Sharing and Analysis Center (MS-ISAC), a resource for cyber threat prevention, protection, response, and recovery for U.S. State, Local, Tribal, and Territorial government entities.
- (3) Multi-State Information Sharing and Analysis Center (MS-ISAC) Alerts - Sign up (or ensure that your county information security officer or IT department is signed up) for MS-ISAC alerts. It's free. It is currently more information than you will probably need, but they are working toward an Elections-Specific feed which will benefit all states. Sign up here: <https://learn.cisecurity.org/ms-isac-subscription>.
- (4) DHS Resources – For those that are interested, DHS offers free resources – cyber hygiene scans, virtual cyber training, phishing campaign assessments and risk/vulnerability assessment and expert intrusion analysis by their Hunt and Incident Response Team (HIRT). Attached are a few of the DHS Communiques (aka newsletters) that cover all of these resources, as well as who to contact to arrange for them.
- (5) Cyber Security Resources from CACEO New Law – a handout provided at CACEO New Law listing cyber security services and resources that are available from a variety of sources.

Inyo County also received an email from Neal Kelly, Orange County Registrar of Voters, dated 3/14/2018 with a list of resources that are available to counties. Neal Kelley is a member of the U.S. Department of Homeland Security's Government Coordinating Council (GCC) for the election subsector.

- **The Commission will learn about risk-limiting audits as a potential best practice the state could implement to help ensure the integrity of election results. How would the implementation of risk-limiting audits impact your office as compared to the current requirement of a 1 percent manual tally?**

Inyo County conducted a Risk-Limiting Audit, in addition to the required 1% Manual Hand Tally, following an April 10, 2018 Special Election. The report of those findings and conclusions are attached.

- **What kind of support would have to be provided to you to make publicly-developed elections software and/or hardware a feasible alternative for your county?**

A publicly-developed, open or disclosed source election system, would allow anyone -- academics, security professionals or interested citizens -- to audit the voting system design for any security weaknesses.

According to the National Conference of State Legislatures, a single proprietary high-speed ballot scanner ranges from \$70,000 - \$100,000. An entire proprietary elections system for an area like Inyo County, with 10,000 voters, can cost upwards of \$300,000 under a traditional proprietary license. Traditional proprietary systems also lock-in counties to service contracts that last the entire life of a voting system. If the county is unhappy with the service provided, cannot afford the price of the service contract, requires an upgrade to the technology, or if the technology company either goes out of business or sells their corporation, there is no way for the county to effectively negotiate a better contract under the current regulatory system.

California could change this paradigm by funding an election system design, under an open source license or disclosed source license, which would allow any state, county or town to adopt the system for the price of hardware and set-up alone. This one-time investment would make secure, high-assurance election technology affordable for many jurisdictions. Not only would the capital costs be lower but, with open source technology, maintenance, support and upgrades could be competitively bid, bringing down the operating costs as well.

The cost to design such a system would be in the low millions, which represents only a small portion of California's overall annual budget. A relatively small investment could save hundreds of millions of taxpayer dollars over time.

California could also help facilitate the adoption of open-source voting systems by doing the following:

1. California could cover the testing and certification fees for any election system using open source software and data. This could save the State of California potentially hundreds of millions of dollars in matching funds for the purchase of propriety systems.
 2. California could offer matching funds for any county developing non-proprietary, disclosed source or open-source election software that will be free for use by any county in the state.
 3. California could support a consortium of counties to enter into a JPA, or similar appropriate structure, to develop and maintain open source, disclosed source or non-propriety software that would be publically owned by the consortium.
- **Please share with the Commission your recommendations on how the State of California could help your county and others better secure election equipment.**

Funding

As discretionary funding continues to dwindle at the local level, funding will continue to be the biggest challenge to securing our elections. California could begin to alleviate this issue by:

1. Governor Brown suspended election mandates in 2011 and thereby eliminated reimbursement to counties for election mandate activities. California could immediately restore reimbursement for mandated elections related activities, which would free up other general fund monies for election security. (see attached for the entire list of suspended mandates)
2. In lieu of restoring the payment of election mandates, California could either introduce legislation that would allocate a certain percentage of the budget to support elections annually or they could develop an easier way to pay a pro-rata share of its election costs.
3. Employee staffing is the number one expenditure in elections. Unfunded pension liabilities and healthcare costs continue to increase. As more funding is used for employee benefits, there is less left over for needed expenditures; including to fund working employees. California should continue to seek solutions for this problem.

Development of Open-Source Voting Systems

California could provide funding to develop an open-source voting system for every county to use to use, for little or no cost. The current for-profit proprietary election systems have a lock on the US Voting System market and the high cost, highly regulated environment, has created a barrier for open-source voting systems to enter the market

Open-source software by itself cannot guarantee that the election systems would be tamper or error free. However, allowing the public to scrutinize the source code would reduce the risk of irregularities and assure the public that election results are correct.

By providing needed funding, the cost of development, testing and certification would be removed, making it finally possible to deploy an open-source voting system into the market. This would further reduce costs by making the market more competitive and allowing additional vendors into the market to support election systems.

Cyber-security Grants

DHS and California have both recently set aside funding for election security. Local election officials could benefit from those funds if they were offered Security Grants, similar to the way that the Help American Vote Act (HAVA) funding was allocated.

Development of Best Practices Specific to Each Voting System

The National Institute of Standards and Technology (NIST) has recently updated their Voluntary Voting System Guidelines (VVSG). California could develop Best Practices, using the VVSG standards, specific to each voting system certified for use in this state.

One of the barriers to adopting the VVSG suggestions is the lack of technical ability to read through every NIST guideline and extrapolate only what is needed for a specific voting system. If California set aside resources to develop Best Practices for specific systems, it would accelerate adoption of the VVSG.

Albert

Other states have funded election monitoring services, such as Albert, for their election jurisdictions. California could help secure elections by funding Albert, or similar monitoring programs, to ensure that we are able to identify threats and respond to them timely.

Cyber-security courses

Data breaches, ransomware, malware, phishing and denial of service attacks (DDoS) are becoming a regular part of using modern technology, in both our public and private endeavors. Local election officials are on the front line of protecting our democracy, but often lack the tools necessary to recognize and respond to these types of attacks. California could offer highly skilled cyber-security courses, online or in-person, to its election officials to help safeguard our elections.

Adoption of More Robust Audits

California law requires election officials to conduct a public manual tally of 1% of ballots cast in elections where voting systems are used to tabulate vote totals. The 1% manual tally audit requirement was initially adopted by the California Legislature in 1965, when most votes were cast in person on Election Day.

Last year, the California Legislature passed AB 840 which clarified that only ballots tallied in the semi-official results report issued on Election Day would be subject to the 1% public manual tally. In 2016, over five million ballots were tallied after Election Day and would not have been subject to the 1% manual tally audit under the provisions of AB 840.

Reducing the number of ballots subject to the 1% public manual tally diminishes the effectiveness of the manual tally to detect errors in vote tabulating equipment, or fraud that might occur after ballots are tallied on Election Day.

California should consider adopting a Risk-Limiting Audit, or amending its 1% manual tally audit, to ensure that ALL ballots are subject to a post-election audit.

Thank you for taking the time to read and consider my testimony and recommendations. Please feel free to contact me with any questions or comments at 760-878-0224 or kfoote@inyocounty.us

Sincerely,

A handwritten signature in black ink, appearing to read 'Kammi Foote', enclosed within a rectangular box.

Kammi Foote
Inyo County Clerk/Recorder

REPORT ON THE INYO COUNTY RISK LIMITING AUDIT PILOT



PREPARED BY:

KAMMI FOOTE
INYO COUNTY CLERK-RECORDER
& REGISTRAR OF VOTERS

April 20, 2018

BACKGROUND AND DISCUSSION

Inyo County, California was organized in 1866 from land set aside from Mono and Tulare Counties. The County was originally named Coso County, and the town of Independence is designated as the County seat. The County is characterized as rural and frontier, and is located in the central-eastern part of the state. Comprised of more than 10,142 square miles, Inyo County is geographically the second largest county in California.

According to census information, the population of Inyo County is estimated to be 18,467. As of April 20, 2018, there are 9,708 registered voters in Inyo County.

The Inyo County Elections Department conducts elections for Federal, State, County and City jurisdictions, seventeen Special Districts, six School Districts, two Hospital Districts, a Community College District and a Resource Conservation District.

There are 68 regular precincts that are consolidated into an average of 21 voting precincts in a countywide election.

In the 2016 General Election, over 68% of voters received a vote by mail ballot in Inyo County. The high percentage of mailed ballot voting is due, in part, to several election reform laws that have made voting by mail an ideal option for voters in California.

Inyo County issued a Request for Proposal to purchase a new voting system on June 1, 2017. Dominion Voting Systems, Inc. was selected as the successful bidder in October 2017. Because the majority of voters have elected to vote by mail, the Inyo County Elections Department opted



to count all ballots in a central location, as opposed to investing in voting equipment that would tabulate vote totals at the precincts on Election Day.

Inyo County has not yet made a commitment to adopt SB 450 - the Voter's Choice Act - but was one of 14 California Counties that was authorized to adopt a Vote Center Model, per SB 450, in 2018.

ELECTION AUDITS IN CALIFORNIA

California law requires election officials to conduct a public manual tally of 1% of ballots cast in elections where voting systems are used to tabulate vote totals. The 1% manual tally audit requirement was initially adopted by the California Legislature in 1965, when most votes were cast in person on Election Day. Over the years, the number of ballots received and/or qualified as eligible to be counted after the semi-official canvass have increased exponentially. Reasons for additional ballots added to vote totals after Election Day include; Conditional Voter Registration which allows citizens to register and vote up to and including Election Day, the prevalence of Provisional ballot voting, the authorization of ballots that are postmarked by Election Day and received by three days after an election to be counted and new rules that allow voters up to eight days, post-election, to cure an unsigned ballot envelope.

In 2017, the California Legislature passed AB 840 which established the minimum number of ballots required to be included in the 1% public manual tally. AB 840 also clarified that only ballots tallied in the semi-official results report issued on Election Day would be subject to the 1% public manual tally. Reducing the number of ballots subject to the 1% public manual tally diminishes the effectiveness of the manual tally to detect errors in vote tabulating equipment that may possibly occur after ballots are tallied on Election Day. There is currently a bill in the California Legislature, AB 2125 (Quirk), which would authorize the use of risk-limiting audits (RLAs) in lieu of the 1% manual tally, beginning with the March 3, 2020 statewide primary election.

According to a "A Gentle Introduction to Risk-limiting Audits", co-authored by Mark Lindeman and Philip A. Stark, "Risk-limiting audits provide statistical assurance that election outcomes are correct by manually examining portions of the audit trail—paper ballots or voter-verifiable paper records." The report goes on to explain risk-limiting audits, "A risk-limiting audit is a method to ensure that at the end of the canvass, the hardware, software, and procedures used to tally votes found the real winners. Risk-limiting audits do not guarantee that the electoral outcome is right, but they have a large chance of correcting the outcome if it is wrong. They involve manually examining portions of an audit trail of (generally paper) records that voters had the opportunity to verify recorded their selections accurately. Risk-limiting audits address limitations and vulnerabilities of voting technology, including the accuracy of algorithms used to infer voter intent, configuration and programming errors, and malicious subversion."

INYO COUNTY'S RISK LIMITING AUDIT PILOT

In anticipation of potential new audit methods in California, the Inyo County Elections Department conducted a parallel ballot-level risk-limiting comparison audit, in addition to the

required 1% public manual tally of the April 10, 2018 Special Election.

The April 10, 2018 Southern Inyo Healthcare District (District) special election had a single parcel tax contest, with options of “Yes” and “No”. The election had 1,696 voters with 976 votes cast. There were 531 (54%) “Yes” votes and 444 (46%) “No” votes. This measure required 654 (67%) “Yes” votes to pass.

As per direction from the District, all precincts with less than 250 voters were not provided an in-person polling place on Election Day. Because no precincts in the District had more than 250 voters, this election was conducted entirely by mail. There were 10 consolidated voting precincts in the April 10, 2018 Special Election.

In Inyo County, all ballots are balanced and sorted into voting precincts, as opposed to a batch method. Because a RLA relies on an audit trail, the Inyo County Elections Department was careful to preserve all ballots in exactly the order they were scanned for tabulating. To do this, sorted ballots were fed in batches through a high speed scanner. After batches were tallied by the scanner, the ballots were logged and assembled into groups, which were separated, labeled and carefully filed into voting precinct containers. This labeling process created a ballot manifest, which is a description of how the ballots are organized and stored.

Ballot Manifest

*101-1, 95:101-2, 24:101-3, 6:101-4, 1:102-1, 71:102-2, 24:102-3, 6:103-1,
62:103-2, 13:103-3, 5:103-4, 1:104-1, 112:104-2, 30:104-3, 5:104-4, 3:105-1,
70:105-2, 12:105-3, 5:105-4, 2:106-1, 54:106-2, 18:106-3, 2:107-1, 111:107-2,
17:107-3, 8:108-1, 58:108-2, 5:108-3, 1:109-1, 89:109-2, 19:109-3, 10:109-4,
1:110-1, 29:110-2, 6:110-3, 1*

The next step in the RLA was to determine a “seed” consisting of 10 randomly drawn numbers, which would be used to generate the selected ballots for the comparison audit. A set of dice is recommended for this purpose, but lacking dice, the Inyo County Elections Department used slips of paper numbered 0-9 that were randomly drawn, similar to the process used to select precincts for the 1% hand tally. The seed for the risk-limiting audit was 1989860534. The precinct selected for the 1% hand tally was 106.

Next, Dr. Philip Stark assisted the Inyo County Elections Office with using a tool that he developed to perform computations that identify which ballots were to be randomly selected for the audit. This tool is available online <https://www.stat.berkeley.edu/~stark/Vote/auditTools.htm>.

Using a 10% risk limit, the tool produced a random list of 60 ballots to be audited. Because the tool was designed for a simple-majority election, Dr. Stark assisted with the manual calculations for a 2/3 super-majority contest. This manual calculation resulted in a final total of 19 ballots to be included in the RLA. Every third ballot, of the randomly selected 60 ballots listed using the

audit tool, was identified and the voter intent for each ballot was recorded, until all 19 ballots had been examined. The math behind the sample size calculation can be viewed online <https://github.com/pbstark/S157F17/blob/master/audit.ipynb>.

An example of the random ballot selections is as follows. (In this example, the 47th ballot in batch 101-1 is the first ballot selected for the audit. The highlighted portion indicates every third ballot that was identified for the comparison audit):

1, 47, 101-1, 47
2, 65, 101-1, 65
3, 65, 101-1, 65
4, 70, 101-1, 70
5, 73, 101-1, 73
6, 80, 101-1, 80
7, 85, 101-1, 85
8, 89, 101-1, 89

All ballots were examined by one team of four volunteers. One volunteer called out the vote indicated on the ballot, another volunteer observed to ensure that the correct vote was called out, and the other two volunteers recorded the ballot choices on spreadsheets.

After all 19 ballots were examined, and the ballot choices recorded on spreadsheets, then the spreadsheet results were compared to a Cast Vote Record (CVR) export from the vote tabulation system. The CVR export contained ballot level results in an easy to read spreadsheet, like the example below, but with result totals displayed.

Cast Vote Record

Batch		Ballot		Precinct
3	4	3-1-4	Mail Precinct	110MB
3	5	3-1-5	Mail Precinct	110MB
3	6	3-1-6	Mail Precinct	110MB
3	7	3-1-7	Mail Precinct	110MB
3	8	3-1-8	Mail Precinct	110MB
3	9	3-1-9	Mail Precinct	110MB

The 19 ballots examined matched 100% with the results displayed in the CVR export. This entire process took 33 minutes (approximately 104 seconds per ballot).

In comparison, the 1% public manual tally included 74 ballots – which included every vote cast in voting precinct 106. These ballots were tallied by the same group of four volunteers. One

volunteer called out the vote indicated on the ballot, another volunteer observed to ensure that the correct vote was called out, and the other two volunteers tallied the ballot choices on hand tally sheets created for this purpose. This entire process took 8 minutes (approximately 6.5 seconds per ballot). This tally matched 100% with the Statement of Vote totals.

CONCLUSION

Although the mathematical computation and methodology was initially difficult for the Inyo County Elections Department to grasp, the Risk-limiting Audit tool developed by Dr. Philip Stark was instrumental in identifying which ballots needed to be audited to ensure statistical accuracy of the election. In addition, Dr. Philip Stark personally advised the Inyo County Registrar of Voters, including developing a calculation for a $2/3$ super-majority contest.

The overall process was much easier than anticipated. In the future, it would be more pragmatic if ballots were numerically stamped when they are scanned, as is the practice in some jurisdictions that regularly conduct RLAs. With proper planning, a large-scale risk-limiting audit could definitely be accomplished in Inyo County. Because Inyo County utilizes election volunteers, who are paid a stipend, the total cost to conduct the RLA was equivalent to the 1% public manual tally.

Not having previously observed a risk-limiting audit, nor having on-site assistance, it was unclear whether it would be possible to conduct a proper risk-limiting audit, as designed. Thankfully, several experts with previous experience offered to assist the Inyo County Registrar of Voters to understand the methodology required to carry out the pilot. We would like to thank Dominion Voting Systems, Inc, Stephanie Singer, Neal McBurnett, Dwight Shellman and Harvie Branscomb for your assistance. We would also like to thank Dr. Philip Stark, because without his guidance, it is unlikely that this pilot would have been successful.

California should be fully funding elections by restoring payment to counties for previously suspended election mandates.

Since 2011 several election mandates have been suspended by the State of California, resulting in non-reimbursement to county government for state mandated activities.

2011-12 Mandate Suspensions:

- Handicapped Voter Access Information Act (Chapter 494, Statutes of 1979)
- Fifteen-Day Close of Registration (Chapter 899, Statutes of 2000)
- Absentee Ballots (Chapter 77, Statutes of 1978 and Chapter 1032, Statutes of 2002)
- Absentee Ballots – Tabulation by Precinct (Chapter 697, Statutes of 1999)
- Permanent Absentee Voters I (Chapter 1422, Statutes of 1982)
- Absentee Ballots – Tabulation by Precinct (Chapter 697, Statute of 1999)
- Brendon Maguire Act (Chapter 391, Statutes of 1988)
- Voter Registration Procedures (Chapter 704, Statutes of 1975)

2012-2013 Mandate Suspensions:

- Permanent Absent Voters II (Chapter 922, Statutes of 2001; Chapter 664, Statutes of 2002; and Chapter 347, Statutes of 2003)
- Modified Primary Election (Chapter 898, Statutes of 2000)
- Voter Identification Procedures (Chapter 260, Statutes of 2000)

What do mandate suspensions mean for elections?

This means that no claims will be paid for any costs incurred by county elections officials who choose to voluntarily provide these election services.

Generally speaking, when a mandate is suspended for a period of time, the local governmental entity is not required to provide the *reimbursable* portion of the service during that time frame. County elections officials are however still required to provide the non-reimbursable portions of the service.

There are some exceptions to this general rule. The Commission on State Mandates has already determined what is and is not a reimbursable mandate. Most county elections offices have continued to follow all relevant portions of state election statutes, despite the suspension of payment, to ensure ease and uniformity of voting across the State of California.

With increasing cybersecurity threats, greater demands on election related outreach services and the addition of new election programs, there is no valid reason for the State to continue to withhold reimbursement payments from counties for these critical infrastructure services.

