



Memorandum

To: Members, Board of Supervisors

From: Director John Arntz

Date: February 26, 2021

RE: Report to the Board of Supervisors regarding the potential implementation of the Voter's Choice Act in future San Francisco elections

The purpose of this memorandum is to report to the San Francisco Board of Supervisors on the potential implementation of the Voter's Choice Act (VCA) in future San Francisco elections.

On May 19, 2020, the Board of Supervisors enacted Ordinance No. 200400, adding Article XI to the San Francisco Municipal Elections Code (SFMEC) and requiring the San Francisco Department of Elections (Department) to submit a report "*regarding the potential implementation of the Voter's Choice Act in San Francisco for elections to be held in 2021 and thereafter*" by February 28, 2021.

The VCA, or Senate Bill 450, was signed into law on September 29, 2016, adding section 4005 to the California Elections Code (CAEC), and allowing California counties to conduct "all-mail" elections provided those counties complied with the list of conditions detailed in CAEC §4005(a) et seq. Under the VCA, 14 specifically listed California counties, not including San Francisco, could begin conducting such elections as early as 2018, while the state's remaining 44 counties, including San Francisco, could choose to make this transition beginning in 2020, subject to the same conditions.

In a VCA model jurisdiction, county elections officials must mail ballots to all actively registered voters, replace neighborhood polling places with a specific number of centralized vote centers, and maintain a specific number of ballot drop-off boxes. Every voter in a VCA jurisdiction may choose to return their ballot by mail (postage paid) or deliver it to any ballot drop-off box or any vote center. Every voter in a VCA jurisdiction may also choose to visit a vote center to register or update their registration, cast a ballot in person, receive a replacement ballot, or utilize additional resources, such as translated materials, language assistance, and accessible voting equipment.

The Department has prepared this report on the potential implementation of the VCA elections model in San Francisco; the report consists of three sections.

Section A begins with an overview of the VCA, and discusses recent voting trends in San Francisco as well as the results of a recent survey conducted by the Department to solicit public feedback on potential adoption of the VCA elections model. Section B discusses the topics listed in SFMEC §1103(b), addressing the potential impact of the adoption of the VCA on 1) voter outreach, education, and services; 2) staffing and staff training; 3) location and operation of potential vote centers; 4) voting equipment and capacity; and 5) ballot collection and processing. Finally, Section C presents budgetary projections and a tentative timeline for VCA implementation in San Francisco.

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Section A

1. Voter's Choice Act Overview

Under the VCA elections model, all registered voters in a participating jurisdiction are mailed ballots no later than 29 days before Election Day, with voters registering after that day continuing to be mailed ballots on a rolling basis up through one week before Election Day. In addition, voters with disabilities and military and overseas voters also have the option to use an accessible vote-by-mail system to access and mark their vote-by-mail (VBM) ballots in a screen-readable format on any computer with internet access.

However, voters in VCA jurisdictions are not limited to voting by mail; any county adopting this election model must establish, with extensive public input, a specific number of ballot drop-off and vote center locations for use by all resident voters. A number of provisions in the VCA detail the specific considerations to be taken into account when selecting vote center and ballot drop-off locations, the specific services that must be available at each vote center, and the specific ratios to be used when determining the number of vote center and ballot drop-off sites to be established in the adopting county.

Ballot drop-off and vote center locations must be carefully selected with voter equity, accessibility, and convenience in mind. Moreover, all vote centers must offer a full complement of election services, including in-person voting, accessible voting options, language assistance, VBM ballot drop-off, and conditional voter registration. While the VCA requires fewer in-person sites than those required under the traditional polling place election model, vote centers must open earlier and provide a full range of service to all voters in the county – unlike polling places, which are designed to serve only voters in particular precincts and thus stock only precinct-specific rosters and precinct-specific ballots.

The VCA requires elections officials in participating jurisdictions to provide certain numbers of vote center and ballot drop-off locations based on the number of registered voters in the county 88 days prior to Election Day. Based on the number of registered voters in San Francisco as of the time of this writing (511,474), the Department would need to operate approximately 53 vote centers and 35 ballot drop-off sites citywide. While all 35 ballot drop-off sites would need to be open between 28 days before Election Day and the close of polls on Election Night, San Francisco's 53 vote centers would open in two stages, with 11 opening 10 days before the election and through Election Day, and the remaining 42 opening 3 days before and through Election Day.

Community consultation would be a key element of the VCA transition process. In fact, for any election conducted under the VCA model, the law would require the Department to develop an Election Administration Plan (EAP) in consultation with the public and, in particular, with local organizations serving voters with disabilities and those requiring language assistance.

To assist counties with the VCA transition process, the California Secretary of State (SOS) has created a "VCA Starter Kit" with a sample calendar listing a number of statutory deadlines as well as suggested timelines for transitioning to the VCA elections model. According to this calendar, a transition to the new elections model in San Francisco would need to begin approximately 14 months before the first VCA election, i.e., April of 2021 for the June 2022 election or September of 2021 for the November 2022 election.

Were the City to make this transition, the Department would begin by devoting several months to identifying and expanding the Department's relevant voter outreach partnerships and initiating the transition process with members of the Department's Voter Accessibility Advisory Committee (VAAC) and Language Accessibility Advisory Committee (LAAC). (The VAAC

provides recommendations to the Department regarding elections access for seniors and persons with disabilities while the LAAC provides recommendations to the Department regarding elections access for voters who primarily speak a language other than English.) These collaborations would be crucial to the successful implementation of the VCA, allowing the Department to consider and incorporate public feedback on both voter outreach and election administration under the new model.

Simultaneously, the Department would need to begin developing an internal draft of an EAP, in consultation with its VAAC and LAAC, to detail how San Francisco would implement the VCA pursuant to CAEC §4005(a) et seq. In this draft plan, the Department would address numerous topics, including the number, locations, and hours for proposed vote centers and ballot drop-off locations, security and contingency plans at those locations, services for voters with disabilities, language access for limited English proficiency voters, and voter education and outreach strategies to inform voters about changes to the voting process.

Upon completion of the draft EAP, the Department would seek public comment and feedback before finalizing and submitting the plan to the SOS for approval approximately five months before the first VCA election.

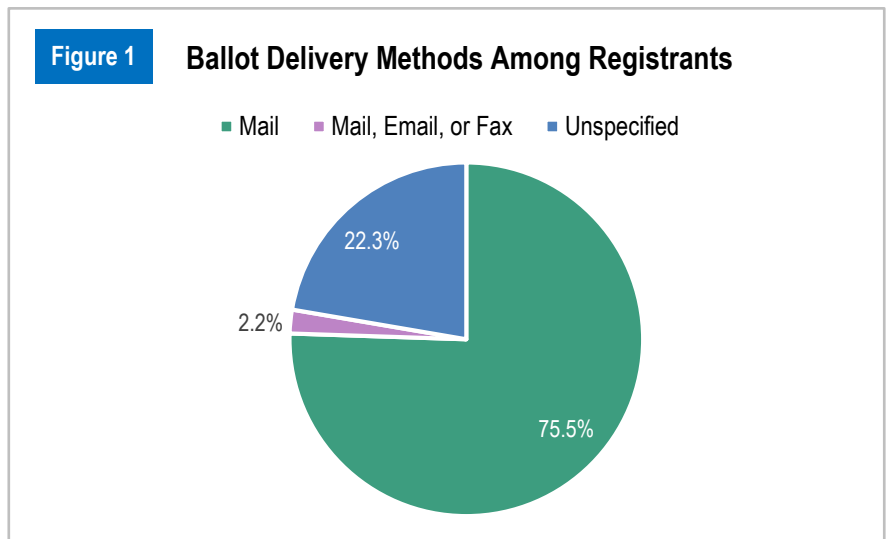
2. Voter’s Choice Act Impact Study: Voting Trends and Voter Survey

To facilitate a greater understanding of how local voters have chosen to participate in recent elections and how they think a transition to the VCA elections model in San Francisco might affect them, the Department conducted a VCA impact study. This project began with the compilation and review of recent voter data, followed by a multilingual survey of San Francisco voters and a subsequent analysis of survey responses. This section presents findings revealed through review and analysis of both voting trends and survey responses.

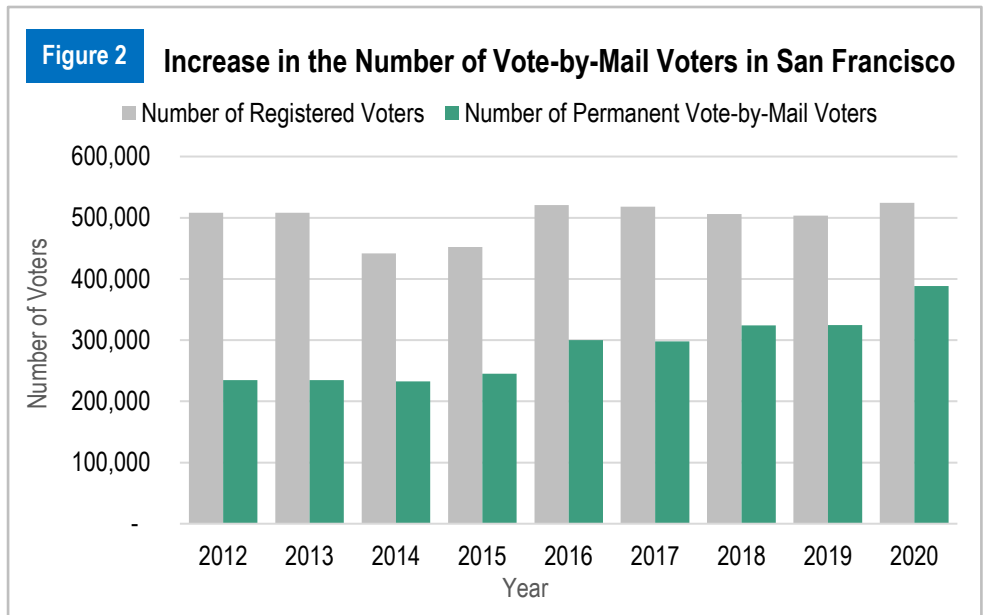
I. Voting Trends in San Francisco

As of the time of this writing, San Francisco has over 511,000 registered voters, of whom approximately 386,000 are registered as permanent vote-by-mail (VBM) voters, meaning they have requested to be mailed a ballot automatically for every election. Approximately 11,000 San Francisco registrants live overseas or serve in the military and therefore receive their ballots by postal mail, email, or fax.

As shown in [Figure 1](#), nearly 78% of the City’s voters already receive their ballots by either postal mail, email, or fax.

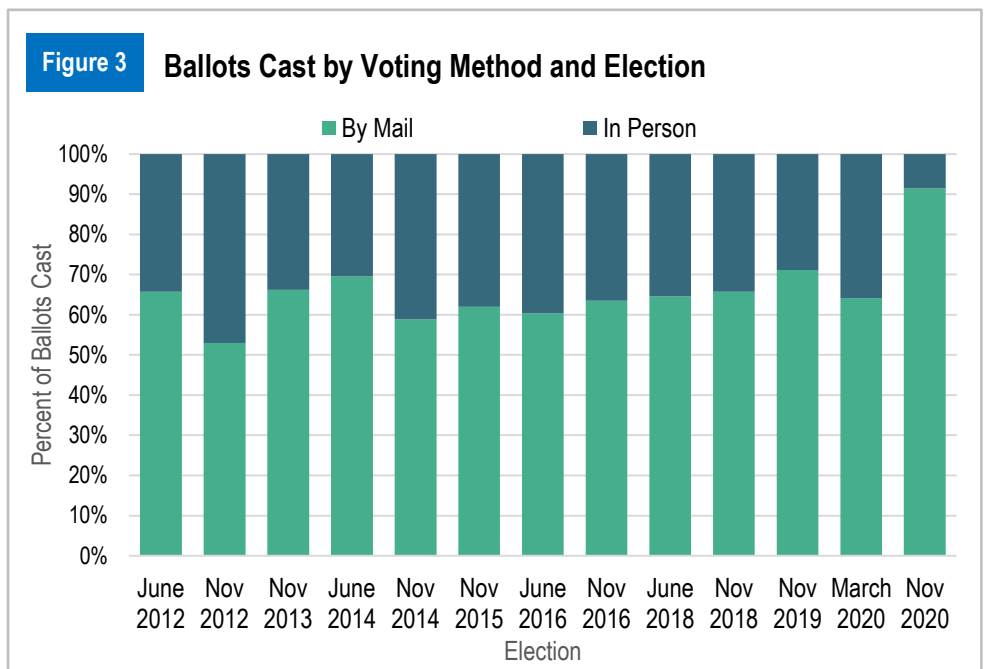


In 2002, California adopted a “no excuse vote-by-mail” policy (any voter could request a mailed ballot without providing a reason). Since this change went into effect, there has been a steady increase in the number of permanent VBM voters across California, with the percentage of permanent VBM voters in San Francisco rising from approximately 50% of registrants to approximately 75% over the last decade, as shown in [Figure 2](#).



While the preference for voting by mail has been growing steadily among both San Francisco and California voters for many years, the natural trajectory of the trend was interrupted when all registered California voters were automatically mailed ballots for the November 3, 2020 election as part of a temporary legislative change to protect public health during the pandemic.

According to the California Secretary of State’s 2020 general election voter participation report, 86.7% of the state’s total ballots cast in the November 2020 election were VBM ballots. Yet in San Francisco, this rate was even higher. As shown in [Figure 3](#), approximately 91.5% of ballots cast in San Francisco in the November 2020 election were cast by mail.



Although these data suggest that many San Francisco voters are receptive to voting by mail, information from the past 13 elections also highlight that between 8% and 44% of voters continued to rely on in-person voting services offered at polling places.

Recent voting trends also reveal that among San Francisco voters who choose to vote by mail, postal mail remains the most commonly utilized ballot return method. However, there has also been a growing trend among VBM voters to utilize

in-person options to return their ballots. As shown in [Figure 4](#), while San Francisco voters utilized in-person ballot return options in each of the last 13 elections, a higher proportion of voters chose to return their VBM ballots in person during the November 2020 election than in any of those past elections.

The increased rate of VBM ballots returned in person in the November 2020 election coincided with the Department’s expansion of ballot-drop off services in the City. Specifically, to provide voters with safe and convenient ballot return options during

that election, the Department operated several ballot drop-off stations outside of City Hall, beginning 29 days prior to Election Day, and opened an auxiliary drop-off station in each of the City’s 11 Supervisorial Districts, beginning the weekend prior to Election Day.

While [Figures 2-4](#) reveal voting trends across the City, [Figures 5-7](#) examine the voting methods used by City voters residing in each of 11 Supervisorial Districts, as well voters who requested translated or accessible election materials, and ethnic groups.

As shown in [Figure 5](#), among voters who participated in the November 2020 election, the percentages of those who voted in person at the polls and those who voted by mail were similar across each of the City’s Supervisorial Districts, ranging from 7.5%-9.5% and 90.5%-92.5%, respectively.

Figure 4 Vote-by-Mail Ballots Cast by Return Method and Election

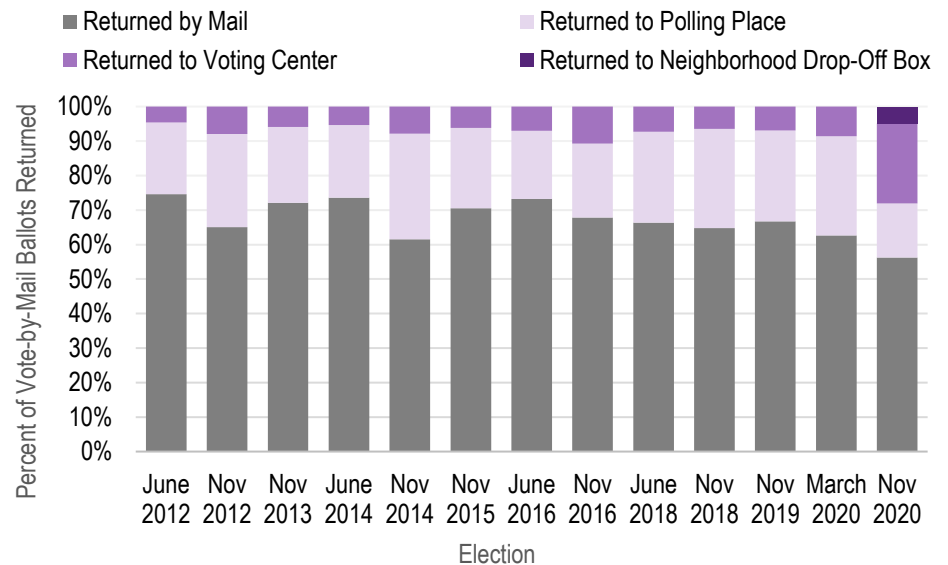
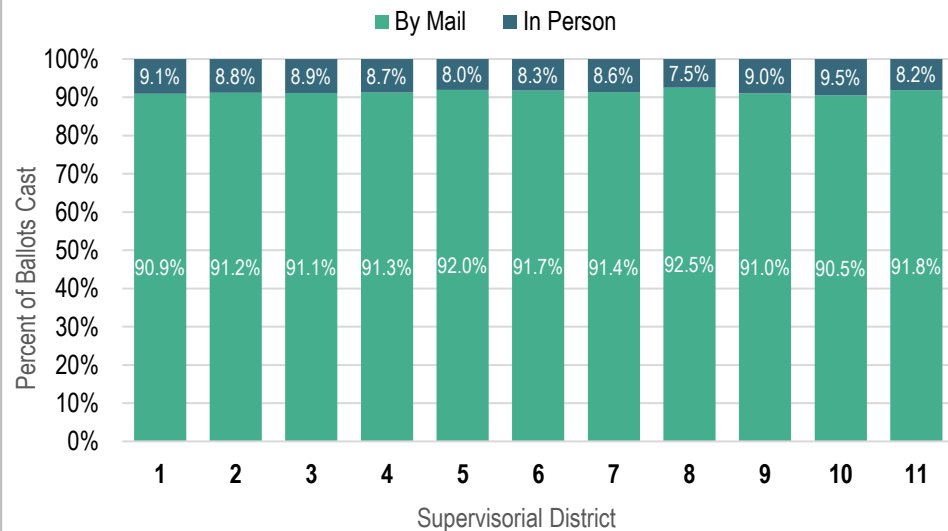
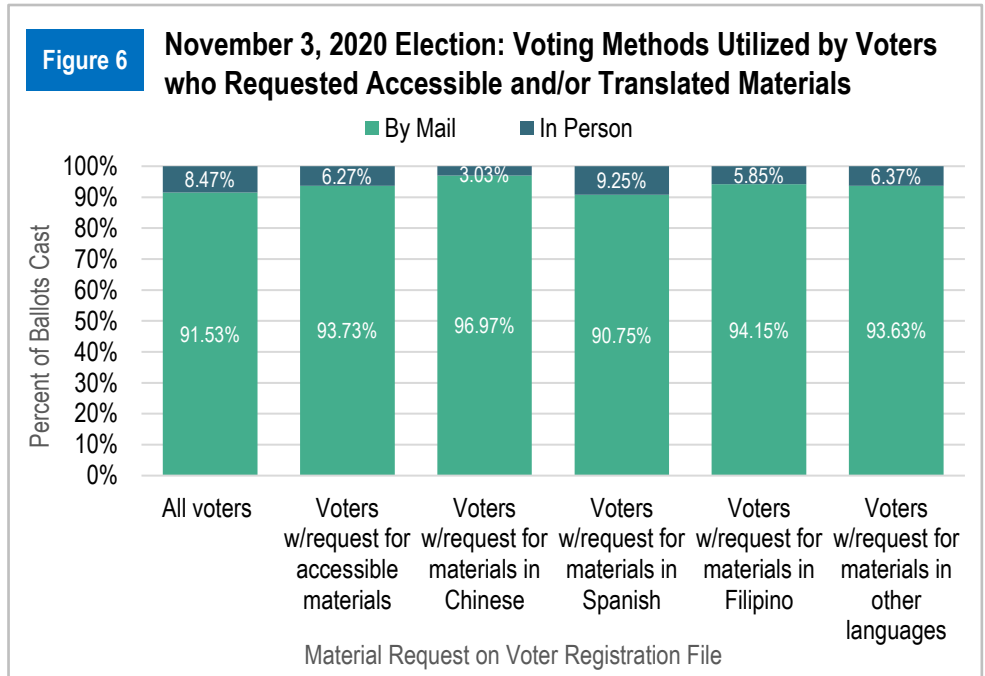


Figure 5 November 3, 2020 Election: Voting Methods Utilized by Voters in Supervisorial Districts

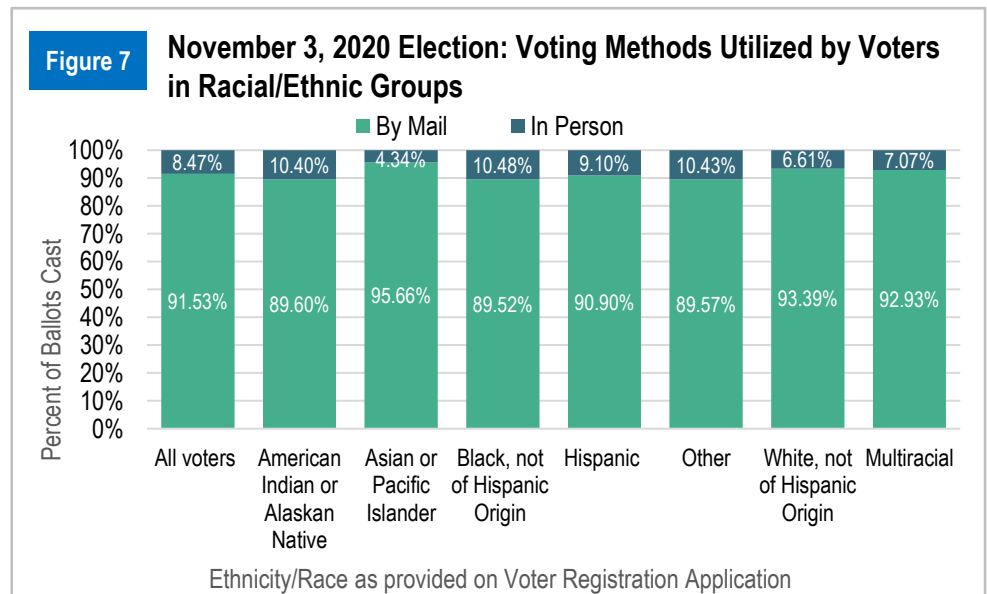


As shown in [Figure 6](#), vote by mail method in the November 2020 election was greater than 90% among voters who previously requested to receive accessible and/or translated election materials. The proportion of voters who voted by mail was slightly lower among voters with Spanish language preference (90.75%) when compared to the overall population (91.53%), and higher among voters with accessible material requests (93.73%), Chinese language preference (96.97%), Filipino language preference (94.15%) and Other (non-English) language preference (93.63%) voters, when compared to the overall population.



Vote by mail voting method in the November 2020 election was also relatively consistent across ethnic groups of voters, based on review of available data. (The voter registration application contains an optional field for voters to provide their race or ethnicity that the Department then enters into its voter registration database. As of the time of this writing, 180,885 out of 511,474 registrants provided such information as part of their voter records and are included in the analysis presented in [Figure 7](#).)

As shown in [Figure 7](#), the proportion of voters who voted by mail was slightly lower among voters who identify as American Indian or Alaskan Native (89.60%), Black or African American (89.52%) or Hispanic (90.90%), when compared to the overall population (91.53%), and higher than average among voters who identify as Asian or Pacific Islander (95.66%), White (93.39%) or Multiracial (92.93%).



The narrow variance in vote by mail method usage across groups of voters who requested translated or accessible

election materials and across racial/ethnic groups suggests that different populations of voters may be similarly impacted by a transition to an “all-mail” election. It would nonetheless be critical under the VCA elections model for the Department to work closely with community leaders to develop and implement voter education plans, and to reach all voter groups, particularly

those who traditionally voted in person. During VCA implementation period, the Department would need to engage in ongoing community dialogue with historically underrepresented groups and communities with vote-by-mail usage lower than the City's average to gather feedback on how the VCA would be experienced at the community level and how to best transition to the VCA elections model.

II. Survey on Potential Adoption of the Voter's Choice Act in San Francisco

In January 2021, the Department developed and conducted a survey to gather public feedback on the potential adoption of the VCA elections model in San Francisco. This survey, which was available in both paper and digital formats in English, Chinese, Filipino, and Spanish, was administered to the Department's network of community outreach partners as well as random sample of San Francisco registrants. To attain sufficient number of responses that reflect the distribution of opinion among registrants, the Department randomly chose approximately 3,000 voters in each of 11 Supervisorial Districts to receive a survey. The Department sent a bilingual survey packet (based on language preference in voters' registration records), with a cover letter, the survey, and a postage-paid return envelope. The cover letter provided a brief overview of the VCA, described the purpose of the enclosed survey, and included a link to an accessible online version of the survey.

The survey consisted of 15 questions, of which seven questions focused on potential changes to voting options under the VCA, seven questions intended to gather voting patterns and demographics of respondents, and one free-form question designed to gather additional feedback:

1. *Would you be more likely to vote if a ballot were automatically mailed to you?*
2. *Would you be more likely to vote if the City replaced polling places with vote centers?*
3. *Which features of a vote center might make voting more convenient for you?*
4. *Would you be more likely to cast your ballot at a vote center if the site had a scanning machine that counted your ballot immediately?*
5. *How far would you be willing to travel to a vote center?*
6. *Which vote center would you most likely choose to visit?*
7. *Do you think a transition to a "Voter's Choice Act" election model with vote centers is a good idea?*
8. *Did you vote in the November 3, 2020 election?*
9. *What mode of transportation do you typically use to travel to your polling place?*
10. *Have you ever used any of the following resources at a polling place?*
11. *In what neighborhood of San Francisco do you live?*
12. *What is your racial or ethnic background?*
13. *What language(s) do you speak at home?*
14. *Do you have a disability that affects voting?*
15. *Do you have any other comments you would like to share?*

a. Responses

The Department received nearly 6,000 survey responses, with 4,757 received by mail and 1,039 responses submitted online.

The majority of respondents indicated they had voted in the November 2020 election: 3,582 had returned their ballots by mail, 1,588 had used ballot drop-off services, 425 had voted at polling places, and 133 had voted at the voting center outside City Hall. Only 33 respondents had not voted in the November 2020 election.

While most respondents indicated they speak English at home, 336 indicated they speak Chinese, 81 Spanish, 23 Filipino, 79 other languages, and 569 speak two or more languages. 320 respondents indicated they had used bilingual services at polling places.

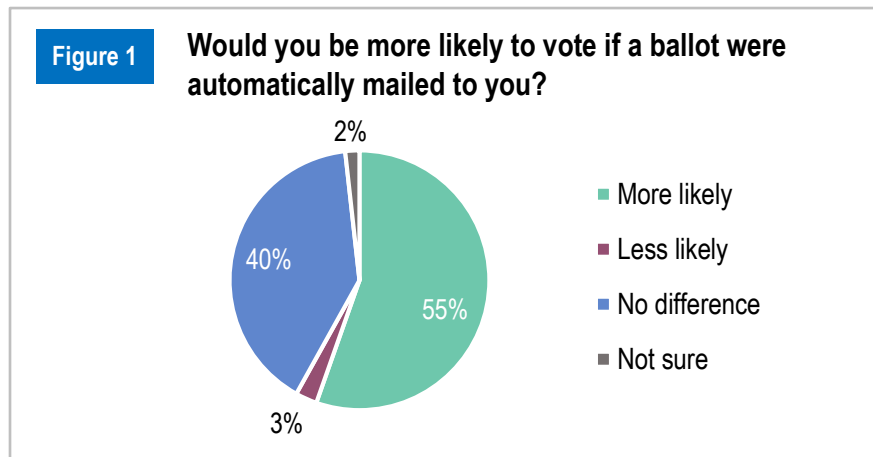
Of those who provided their racial/ethnic background, 11 respondents identified as American Indian or Alaskan Native, 1,345 as Asian, 166 as Black or African American, 335 as Hispanic or LatinX, 19 as Native Hawaiian and Other Pacific Islander, 230 as multiracial, 2,757 as white, and 10 as Other.

246 respondents indicated they had a disability that affects voting, while 217 had used accessible resources at polling places.

Responses to questions inviting respondents to share their opinions about the VCA election model are considered below.

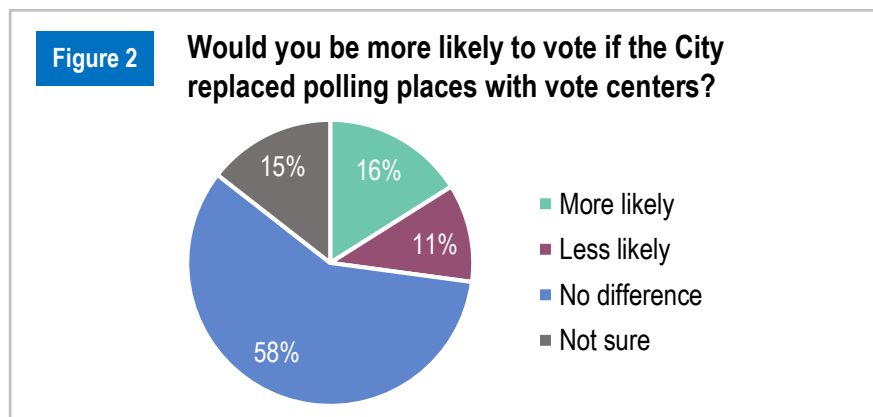
1. Would you be more likely to vote if a ballot were automatically mailed to you?

As shown in [Figure 1](#), 55% of survey respondents indicated they would be more likely to vote if a ballot was automatically mailed to them, 40% indicated that this change would make no difference, 3% indicated that they would be less likely to vote under these conditions, and 2% were not sure.



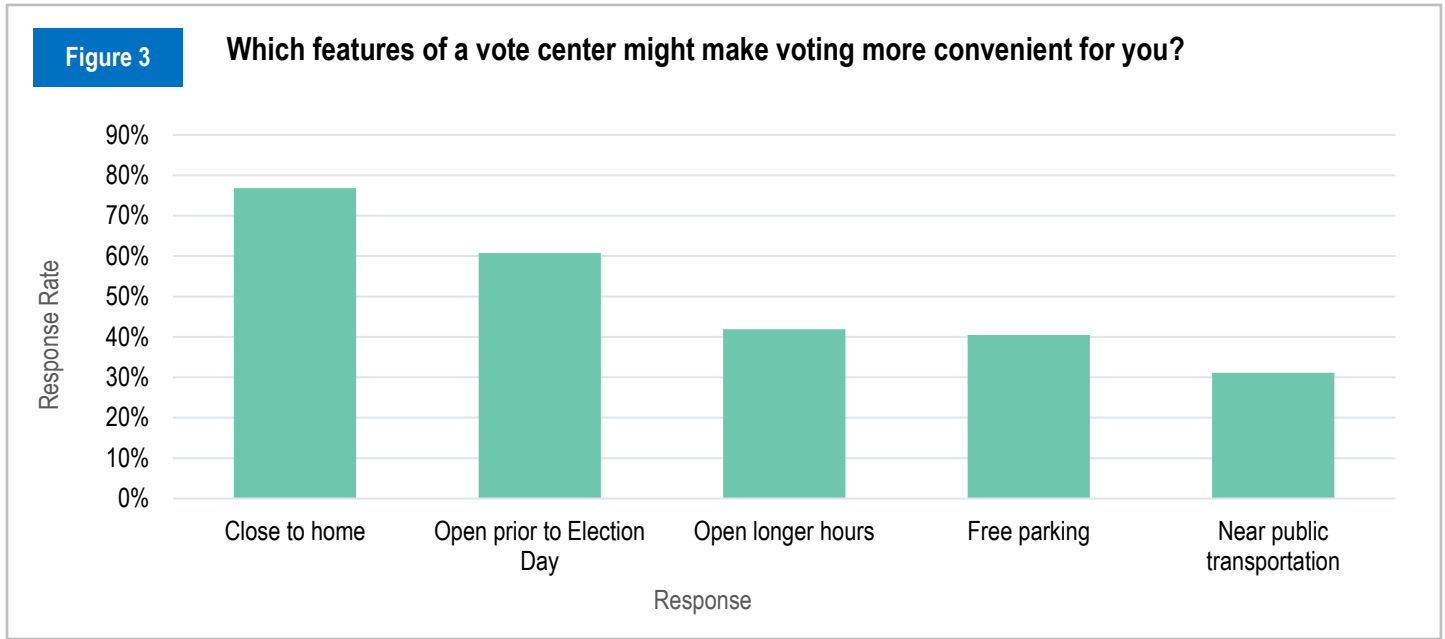
2. Would you be more likely to vote if the City replaced polling places with vote centers?

While [Figure 1](#) reveals voters' views on the "all-mail" aspect of the VCA elections model, [Figure 2](#) provides insight into whether or not voters would be more likely to vote if the City replaced polling places with vote centers. 16% of respondents indicated they would be more likely to vote if polling places were replaced with vote centers, 11% indicated they would be less likely to vote, 14% were unsure, and 59% indicated that this would make no difference.



3. Which features of a vote center might make voting more convenient for you?

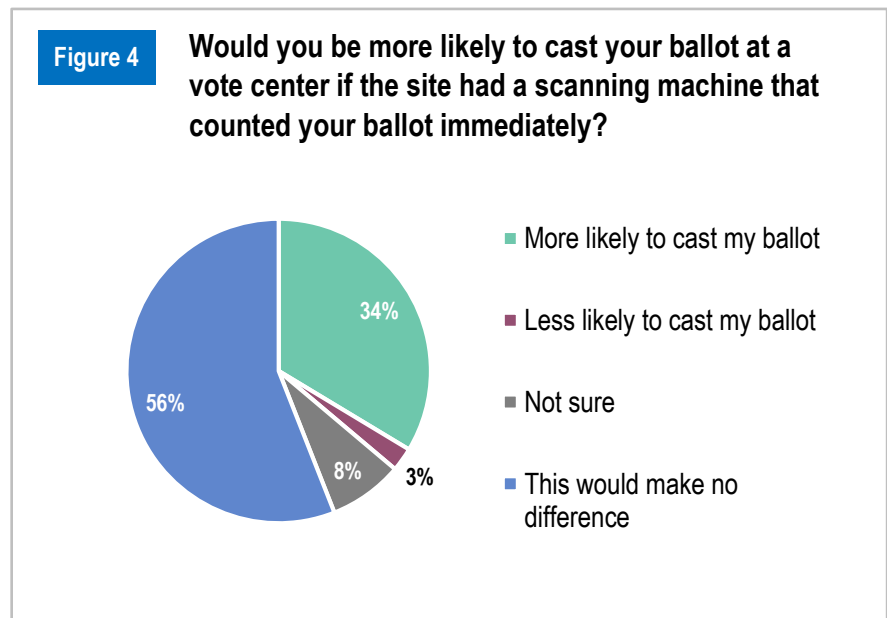
As shown in Figure 3, a large majority of respondents indicated that proximity to home (77%) was a key factor in vote center convenience. Many respondents also indicated they would like vote centers to be open prior to Election Day (61%) and for longer hours (42%). Free parking (41%), and proximity to public transportation (31%) were also desirable features of vote centers.



4. Would you be more likely to cast your ballot at a vote center if the site had a scanning machine that counted your ballot immediately?

For reasons discussed in Section B. 4. II. Voting Equipment of this report, were San Francisco to conduct its future elections under the VCA model, the City would need to decide whether or not to provide ballot-scanning machines at vote centers.

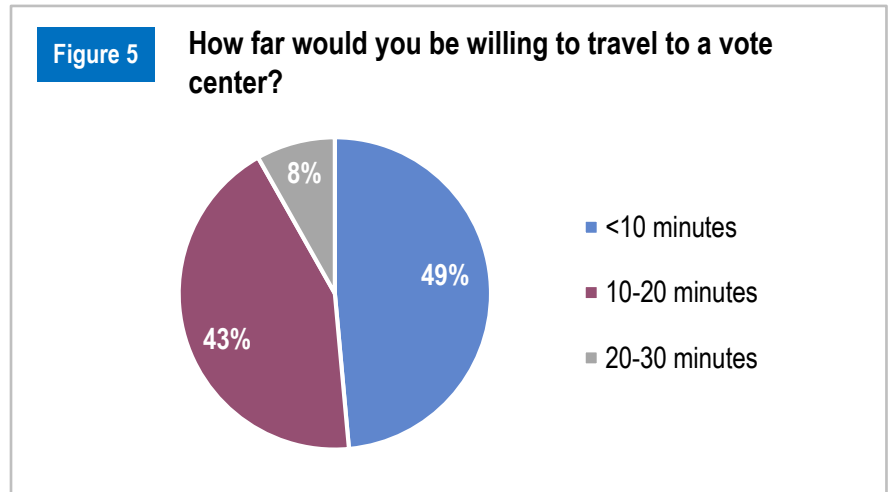
This question was thus designed to gauge public opinion regarding the importance of continuing to provide ballot-scanning machines at vote centers (these machines are provided at polling places). As shown in Figure 4, 34% of respondents indicated they would be more likely to vote at a vote center if vote centers had ballot-scanning machines, 3% indicated they would be less likely to cast a ballot in person, 8% were unsure, and 56% indicated that this would make no difference.



5. How far would you be willing to travel to a vote center?

As shown in Figure 5, nearly half of respondents (49%) indicated they would be willing to travel to a vote center if the site were fewer than ten minutes away, 43% would be willing to travel 10-20 minutes, and only 8% would be willing to travel 20-30 minutes.

Note: Figure 5 excludes data from voters who indicated “I would vote by mail” in their response(s) to this question, to show views among voters who utilize in-person services.

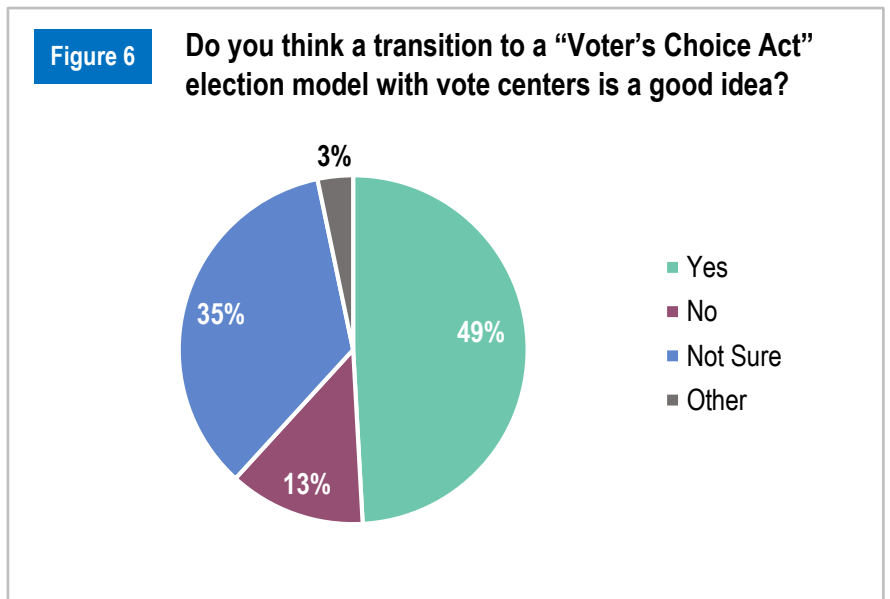


6. Do you think a transition to a “Voter’s Choice Act” election model with vote centers is a good idea?

As shown in Figure 6, more respondents were in favor of transitioning to the VCA elections model (49% responded “Yes”) than opposed to such a transition (12% responded “No”), but many respondents were unsure (34%).

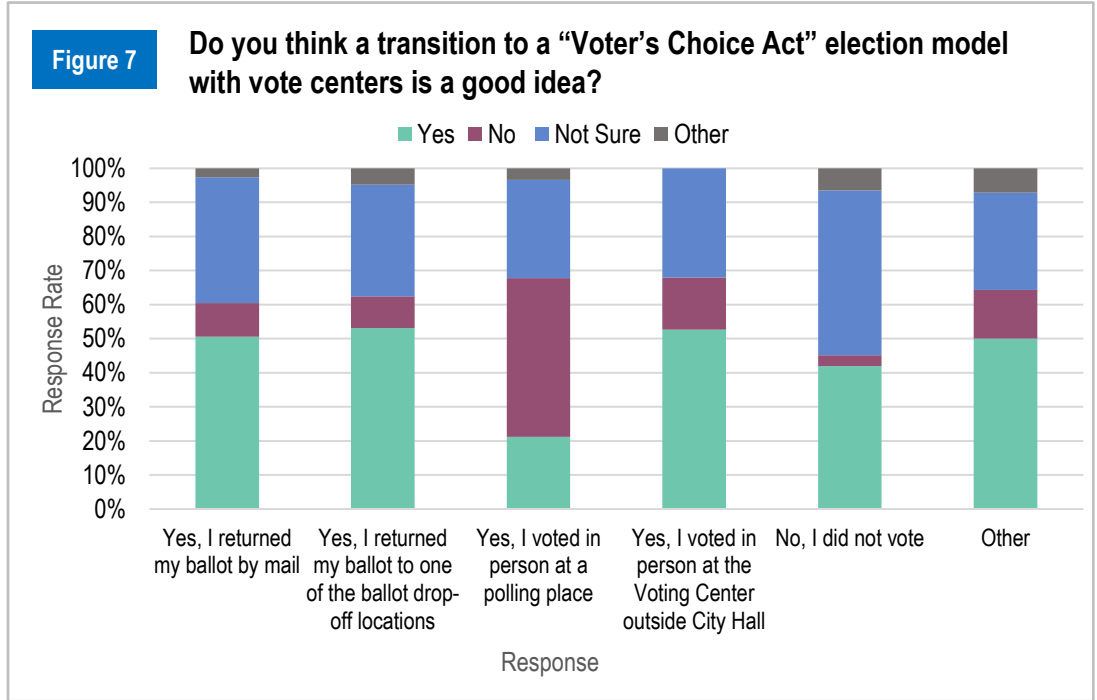
The mixed overall response highlights that, if the City were to transition to the VCA elections model, the Department would need to provide robust outreach and voter education regarding particular aspects of the VCA in order to ensure that local voters are given all the resources necessary to fully participate in elections.

To better understand whether there was any variability in opinions about a potential VCA transition across different communities within the City, the following analysis considers how different voting populations answered the question, “Do you think a transition to a Voter’s Choice Act election model with vote centers is a good idea?”



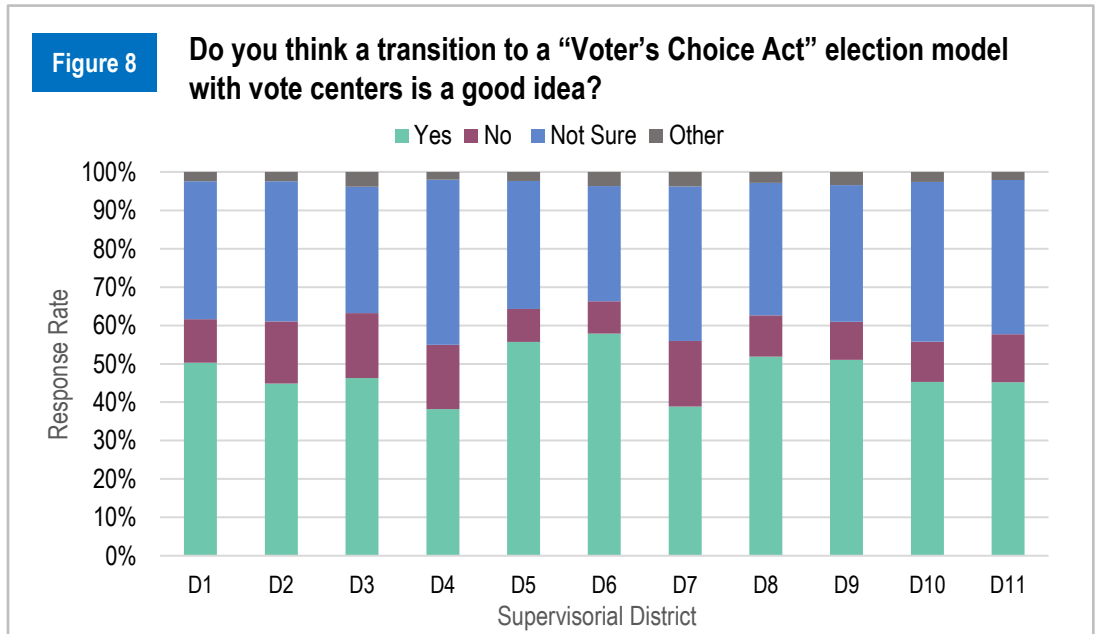
i. Preference among voters by Voting Method

As shown in Figure 7, respondents who had cast their ballot by mail or at the City Hall Voting Center in the November 2020 election were generally more supportive of the transition to the VCA elections model than those who voted in person at a polling place. While over 50% of voters who cast their vote-by-mail ballot or voted at the Voting Center indicated the transition would be a good idea, only 20% of polling place voters shared the same view.



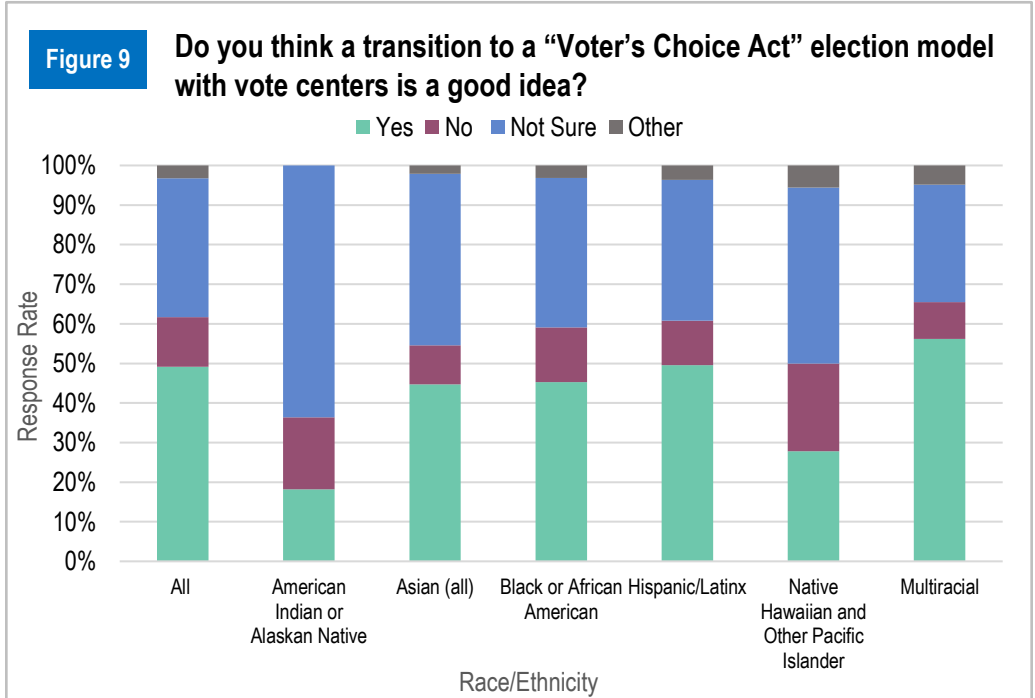
ii. Preference among voters by Supervisorial District

As shown in Figure 8, aggregated responses in different Supervisorial Districts ranged from 38% (in District 4) to 58% (in District 6) in support of transitioning to the VCA elections model. Responses across the City were relatively consistent in that voters who provided definitive answers were more than twice as likely to respond “Yes” than “No”.



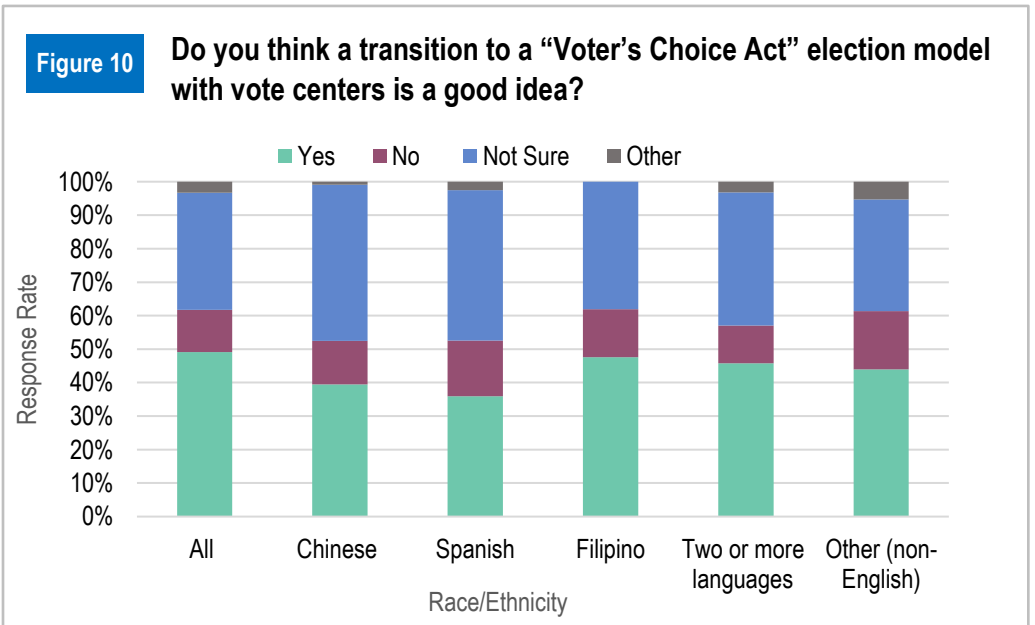
iii. Preference among voters by Race/Ethnicity

As shown in Figure 9, the proportion of voters who indicated that a transition to the VCA elections model was a good idea was slightly higher among voters who identify as Hispanic/LatinX or multiracial, when compared to the overall population, and slightly lower among voters who identify as American Indian or Alaskan Native, Asian (all), Black or African American, and Native Hawaiian or Pacific Islander. However, due to the relatively small sample sizes of these groups, the differences across racial and ethnic groups likely require more research.



iv. Preference among voters by Spoken Language and/or those who have used bilingual services at polling places

As shown in Figure 10, the proportion of voters who indicated that a transition to the VCA elections model was a good idea was slightly lower among voters who speak Chinese, Spanish, Filipino, two or more languages, or another non-English language, when compared to the overall population. Again, due to the small sample size of these groups, the Department would need to conduct further research as part of its transition to the VCA election model to better understand how these groups may be impacted by this change.

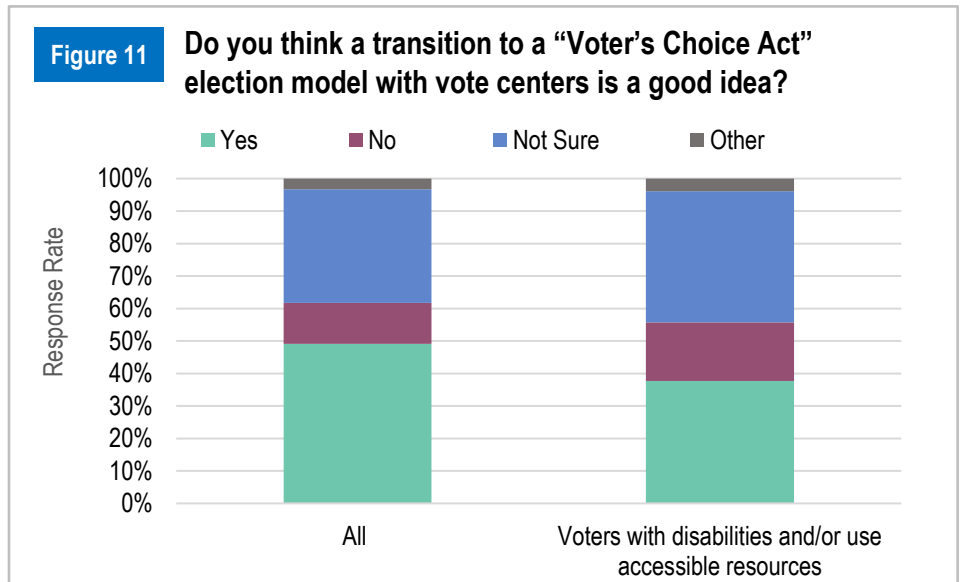


Regardless of the outcome of that further research, the Department would continue

expanding language access, conducting outreach in as many languages as feasible, and working closely with its Language Accessibility Advisory Committee.

v. Preference among voters with disabilities and/or those who have used accessible voting resources

As shown in Figure 11, responses to the question “Do you think a transition to a Voter’s Choice Act election model with vote centers is a good idea?” among those with disabilities and/or those who have used accessible voting services reveal that 38% favor the transition, 18% oppose the transition, and 40% are unsure about the transition. These results suggest that any transition to the VCA would require significant partnership with disability community leaders to address concerns shared by voters in this group.



b. Survey Conclusions

The results of this survey indicate neither an overall support for, nor an overall opposition to a potential transition to the VCA elections model in San Francisco; mixed views are held both generally and among specific voting populations. Voters who already vote by mail tended to favor the VCA model, while polling place voters tended to dislike the idea, but more generally, there was no clear consensus reflected in the received responses. Based on these results, the Department anticipates that any VCA planning and implementation process would need to include a robust outreach program – one designed to ensure that all current and future voters receive information and resources necessary to fully participate in elections conducted under the VCA model.

Section B

1. Voter Outreach, Education, and Services

I. Voter Outreach Strategies

Reaching and educating various communities about essential elements of the VCA would be crucial to the successful implementation of administering elections in San Francisco under the new election model.

The Department already incorporates many effective strategies in its current outreach programs intended to reach members of the City’s communities of color, voters who are elderly, voters living in neighborhoods with turnout below the City average, voters who prefer to speak languages other than English, voters with disabilities, voters who are unhoused or housing insecure, and the public at large. Such outreach strategies include direct and indirect distribution of digital and print materials; official mail notifications; placement of news and radio advertisements; and broadcasting of public service announcements,

all available in translated and accessible formats; and partnership grants with local nonprofit organizations who are well poised to assist in disseminating election information to vulnerable populations.

Were the City to adopt the VCA elections model, the Department would leverage the reach of its current outreach strategies as well as the expertise of members of its Language Accessibility Advisory Committee (LAAC), Voting Accessibility Advisory Committee (VAAC), and other community groups to educate residents about upcoming changes to the voting process.

As stated in *Section A. 1. Voter's Choice Act Overview*, during the VCA transition, the Department would need to develop, with extensive public input, the Election Administration Plan (EAP). Among other topics, the EAP would need to include a detailed Voter Outreach and Education Plan (VEOP), enumerating the Department's proposals for specific outreach strategies, both required under the VCA and those proven effective in educating San Francisco residents. These strategies are briefly described below.

a. Use of Media

To inform San Francisco voters about changes under the VCA elections model, the Department would continue to utilize a number of its current outreach strategies, including running advertisements in local English and non-English newspapers and on radio and television stations; developing multilingual, multi-format outreach messages to be distributed by and through community organizations, City Departments, other government agencies, and local colleges and universities; and placing ads in local public transit shelters and on transit vehicles.

As with other media outreach on the VCA, the Department would continue to utilize its existing Twitter, Facebook, Instagram, YouTube, and Nextdoor accounts to provide information and updates to voters, highlighting critical election deadlines, voting tips, and vote center and ballot drop-off locations. To organize these efforts, the Department would develop a detailed social media plan for the VCA transitional period, noting the dates and content for specific outreach messages.

b. Website

The Department's website, *sfelections.org*, would serve as a comprehensive and fully accessible source of VCA information for the public. The Department would post its EAP, including the VEOP, on the website in all required languages and in a wide range of accessible formats, including audio. Downloadable PDF versions of all VCA related print outreach materials as well as multilingual versions of television and radio PSAs would also be posted on the website. The Department would regularly issue press releases to media contacts and local organizations, highlighting VCA planning deadlines, outreach information, and opportunities to submit public input, with all press releases posted on *sfelections.org*.

c. Community Partnerships

The Department would make all informational content on the VCA available to its community partners, including official digital content as well as a full range of print materials (i.e., brochures, posters, etc.). Working with many partners, the Department would distribute VCA related materials throughout San Francisco by way of community presentations, street fairs, festivals, street canvassing, tabling events, and voter registration drives. The Department would also work with local businesses to post VCA informational materials in store windows and make digital versions of all print outreach materials available for distribution to San Francisco residents via local community organizations.

The Department would also organize a *Community Ambassador Program*, inviting local organizations to designate members of their organizations to participate in the program and receive training and presentation materials to effectively provide general education about the VCA transition to their constituents.

d. Focused Language Access Outreach

To reach language minority voters with VCA information, the Department would leverage its connections with members of its LAAC, a diverse group comprised of representatives from local community-based organizations with a special interest in providing elections information and services in languages other than English. After developing the VEOP and producing multilingual VCA outreach materials in tandem with the LAAC, the Department would then plan and hold bilingual voter education workshops in Burmese, Chinese, Filipino, Japanese, Korean, Spanish, Thai, and Vietnamese, all in collaboration with the LAAC and their contacts.

In addition to reaching language minority voters through and with the LAAC, the Department would continue to partner directly with the wide spectrum of local community organizations and advocacy groups as part of a robust effort to saturate all City neighborhoods with VCA related printed information as well as multilingual presentations. Such presentations would include interactive lecture and tabling events in which Department bilingual outreach coordinators would focus on discussing language assistance services, options for requesting translated election materials, and the availability of the toll-free, multilingual voter assistance hotline.

e. Focused Accessible Voting Outreach

Strategies to reach voters with disabilities would parallel the strategies used to reach language minority voters as described in the immediately preceding subsection, namely leveraging the expertise and contacts of the VAAC, a diverse group comprised of representatives from local community-based organizations with a special interest in designing and maximizing the use of accessible voting resources. Similar to the LAAC collaboration, the Department would work with the VAAC to develop VCA outreach materials, and plan and host VCA voter education workshops regarding election accessibility, some of which would include demonstrations of accessible voting technology.

The Department would also partner directly with local community organizations and advocacy groups who serve seniors and people with disabilities in San Francisco, disseminating digital and print information about the VCA transition, conducting multi-format presentations and accessible voting technology demonstrations at community events, and providing information about the availability of accessible ballots, the process for requesting such ballots, the availability of the toll-free voter assistance hotline, and other election topics of particular interest to members of this community.

f. Other Vulnerable Population Outreach

The Department would make a concerted effort to educate voters in vulnerable communities, including racial and ethnic minorities, City residents living in low-income communities, and San Franciscans who are unhoused or housing insecure, about the VCA transition. At outreach events intended to reach voters and potential registrants of vulnerable populations, Department staff would focus on election topics of particular interest to those in attendance, as well as providing general information about the VCA transition and voting options.

In identifying opportunities for outreach to vulnerable populations, the Department would collaborate with City departments and local agencies, including the Office of Racial Equity, the Department of Homelessness and Supportive Housing, and the

San Francisco Housing Authority, as well as organizations such as Project Homeless Connect, Swords to Plowshares, the Homeless Prenatal Project, Episcopal Community Services, Catholic Charities, Five Keys, and other community partners who provide services to vulnerable and hard-to-reach populations.

As part of its focused outreach to members of the City's most vulnerable populations, the Department would also maintain VCA informational tables at neighborhood venues such as flea markets, farmers markets, and grocery store parking lots to create opportunities for convenient one-on-one interactions with voters.

Finally, the Department would seek funding to supplement its outreach efforts to members of vulnerable populations with grant programs with local nonprofit and community-based organizations who provide services or work with vulnerable populations in San Francisco.

g. Public Service Announcements

In collaboration with its LAAC and VAAC members, the Department would create and broadcast 1) at least one Public Service Announcement (PSA) in English, 2) at least one accessible (closed-captioned) PSA, and 3) at least one PSA in each designated minority language, to provide information about the VCA transition and the toll-free voter assistance hotline. The PSAs would be produced in all CAEC §14201 languages (Burmese, Japanese, Korean, Thai, and Vietnamese) as well as all Voting Rights Act §203 languages (Chinese and Spanish). In addition, to comply with the City's Language Access Ordinance, the Department would create and broadcast a VCA PSA in Filipino.

h. Voter Notices

The Department would develop and provide several voter notices about the VCA transition and other pertinent information in the Voter Information Pamphlet and Sample Ballot (VIP) and on *sfelections.org*.

Such notices would include: a notice in the VIP listing all language assistance services available at each vote center; a notice, either printed in the VIP, or enclosed with vote-by-mail ballot packets, explaining in all languages required under federal, state and local law that 1) an "all-mail" election is being conducted, 2) mailed ballots may be cast in person at vote centers, and 3) accessible and replacement ballots in other languages are available; and a notice listing all vote center and ballot drop-off locations, along with their hours and other pertinent information.

i. Direct Mailers

The Department would develop and send multiple direct mailers to voters and potential registrants in the City.

Such mailers would include: a postcard with information about the availability of translated official and facsimile ballots and accessible ballots, and the process for requesting to receive materials in different languages and/or accessible formats; and an informational insert enclosed with vote-by-mail packets with instructions on how to properly fill out the return envelope, how to request a replacement ballot, how and when to return the ballot, as well as how to request large-print ballots and ballots in different languages.

The Department would also send a minimum of two additional mailers (with digital versions sent to all voters with email addresses in their registration records) with general information about San Francisco's transition to the VCA. These mailers would advise voters of the availability of the toll-free voter assistance hotline, outline available voting options, provide information about vote center and ballot drop-off locations, and other key election information.

j. Toll-Free Voter Assistance Hotline

As part of its outreach efforts and in compliance with VCA requirements, the Department would organize and staff a toll-free multilingual voter assistance hotline to assist voters with any registration or voting questions.

The toll-free phone number would be published on the Department's website and included in various outreach materials, including PSAs, voter notices, mailers, and the VIP.

As an additional service, the Department would also provide American Sign Language interpretation assistance via video conferencing.

II. Services

The impact of the VCA in San Francisco would have three main components: 1) adoption of universal ballot mailing, 2) replacement of polling places with vote centers, and 3) expansion of available ballot drop-off boxes. Under the current polling place model, only a voter who has requested vote-by-mail (VBM) ballot delivery (either for a single election or on a permanent basis) can be mailed a ballot, and the Department has flexibility to operate any number of vote centers and ballot drop-off locations in addition to the required number of polling places.

In the November 3, 2020 election, the Department was able to mail ballots to all locally registered voters because of temporary, statewide legislative changes that took effect in June 2020 for that election only. More specifically, on June 18, 2020, Governor Newsom signed Assembly Bill (AB) 860, requiring California elections officials to 1) mail ballots to all actively registered voters, 2) open accessible vote-by-mail (AVBM) systems to all voters, 3) set up and maintain ballot tracking systems, 4) count VBM ballots that arrive in the mail and are properly postmarked up until the 17th day after Election Day, and 5) begin processing VBM ballots as early as the first day of the early voting period or 29 days before Election Day.

Since changes under AB 860 were temporary, California Legislators introduced two bills late last year: Senate Bill (SB) 29 and AB 37. SB 29 was passed on February 16, 2021, as an urgency statute, extending universal ballot mailing and ballot tracking requirements to all elections conducted prior to January 1, 2022. If AB 37 were to pass, these requirements would be extended to all elections, making universal ballot mailing and ballot tracking permanent. Under AB 37, every active San Francisco voter would be mailed a ballot automatically whether or not the City decided to conduct future elections under a VCA model. If neither AB 37 nor any similar legislation becomes law, only adoption of the VCA elections model would allow all locally registered voters to continue receiving VBM ballots automatically in elections conducted in 2022 and thereafter.

a. Universal Vote-By-Mail

In any election conducted under the VCA elections model, the Department would be required to mail VBM packets, with ballots, instructions, and postage-paid return envelopes, to all active voters no later than 29 days before Election Day, and would continue sending such VBM packets to new registrants on a rolling basis up through one week before Election Day. This process would be similar to the current VBM mailing process – although packets would be sent to all voters rather than to approximately 75% of voters currently registered as permanent VBM voters.

Under the VCA, in addition to mailing paper ballots to all active City voters, the Department would be required to provide an accessible vote-by-mail (AVBM) system. (The AVBM system allows eligible voters to access and mark their ballots remotely, using assistive devices.) The Department has maintained the AVBM system for the last five elections, making it available to military and overseas voters at least 45 days before the election and to all other eligible voters 29 days before the election.

b. In-Person Voting Services

Under the VCA elections model, the Department would be required to replace all of the City's neighborhood polling places (only open for one day on Election Day) with vote centers (open starting 10 days prior to Election Day), offering voters a full complement of services. More specifically, such services would need to include: 1) return of vote-by-mail ballots, 2) voter registration and registration updates, 3) issuance of replacement ballots, 4) issuance of provisional ballots, 5) issuance of standard ballots, 6) accessible voting resources, and 7) minority language assistance. These services are briefly described below.

1) Return of vote-by-mail ballots

Any voter would be able to return their VBM ballot to a secure ballot container at any vote center in the City.

Voters who wish to cast their ballots on site would be able to utilize seated/standing voting booth area to mark their ballots or use any resources available to help them cast their vote, including translated voting materials, facsimile ballots, accessible tools or equipment, etc. These services would continue to be the same as the services the Department has been providing at all polling places.

2) Voter registration and registration updates

At any vote center, voters would have the ability to update their registration information as necessary, and utilize the conditional voter registration (CVR) process to register and vote provisional ballots to be counted after the Department has processed and verified their registrations. (CVR has been available at vote centers since 2017 and at polling places since 2020.)

In addition, under the VCA elections model, "instant CVR," which allows late but eligible voters to register or update their registration and receive a standard ballot, would become available at all vote centers. Instant CVR has not been feasible at the City's polling places because poll workers had continued to use traditional paper rosters and were not able to make updates to voters' registration records or check voting activity in real time, requiring all CVR voters to cast provisional ballots. Under the VCA, the Department would implement voter registration database connectivity and related instant CVR technology at all vote centers, which in turn would allow vote center staff to process many CVR voter registrations immediately and issue standard (non-provisional) ballots.

3) Issuance of replacement ballots

As under the current polling place model, any voter in a VCA model election who never receives, loses, or spoils a previously issued ballot can request a replacement ballot. In order to receive a standard replacement ballot at a polling place, the voter is required to surrender their original VBM ballot or otherwise vote a provisional ballot. Under the VCA model, vote center staff would have the ability to access voter registration records, check voting activity, and issue standard ballots. From the voter's point of view, this would mean vote center staff could offer a non-provisional ballot to any voter requesting a replacement ballot provided their record did not include a counted ballot for that election.

Under the VCA elections model, San Francisco voters could continue to authorize third parties, such as family members, to pick up and/or return their ballots by contacting the Department or submitting the appropriate form at a vote center. In contrast, poll workers in recent elections could not process third party ballot requests because polling places lacked both voter registration database connectivity and availability of all ballot types at each polling place.

4) Issuance of provisional ballots

In California, any voter whose eligibility to cast a regular ballot in a particular election cannot be immediately verified is entitled to cast a provisional ballot. There are several reasons a voter's eligibility to cast a regular ballot might be in question, including having an incomplete or non-existent registration (e.g., a voter who has registered without providing a signature), having already received and/or returned a VBM ballot, or living outside the voting jurisdiction.

Under the VCA elections model, the Department would offer provisional ballots to any voters whose eligibility to cast a ballot in that election could not be immediately verified at a vote center. However, due to the improved technology and connectivity that would be available at vote centers, the number of voters whose eligibility remained in question after Department staff had accessed the registration database would likely be smaller. Under the current polling place model, a voter whose name is not listed on the paper precinct roster is required to vote provisionally, even if the voter claims to be registered to vote elsewhere in the City. In contrast, with real-time access to the voter registration database, a vote center staff would be able to locate records of any registered voter in the City and issue a standard ballot.

5) Issuance of standard ballots

As clarified by the Memorandum # 17066 issued by the Secretary of State's office on August 18, 2007, "The intent of the Voter's Choice Act is to provide voters with more choices to cast and return their ballots. This includes preserving the traditional experience of casting a regular ballot at an in-person voting location." In other words, at any vote center, voters who are eligible to cast standard ballots under the requirements of CAEC §2170, would be issued such ballots.

6) Accessible voting resources

As under the current polling place model, any voter in a VCA model election would be able to choose from a full range of accessible voting resources and services, including touchscreen, audio, and large-print ballots; magnifying sheets to enhance the readability of printed text; pen attachments to make writing utensils easier to grip; large-print versions of voting instructions; in-person and video interpretation for American Sign Language; wheelchair accessible voting booths and seated voting; and curbside voting. (Upon request, a vote center staff member would bring the ballot and necessary materials to the voter and assist the voter, just as poll workers do at polling places.)

As required under the VCA, the Department would deploy a minimum of three accessible ballot-marking devices (BMDs) at each vote center (rather than one per polling place). The BMDs currently leased by the Department from the Dominion Voting Systems are compatible with a number of assistive devices, including braille-embossed handheld keypads, sip-and-puff systems, paddles, and head-pointers, and allow in-person voters to navigate through touchscreen or audio ballots with options to change text and background colors, text size, or audio instructions through headphones. Any voter using one of these devices can view or hear a summary of their choices and change any selections before printing their ballot.

Department staff would post multilingual notices describing all accessible voting services at vote centers, just as poll workers do at polling places under the current model. The Department would also continue striving to improve accessible voting resources at all in-person voting locations, working with members of its VAAC, the Mayor's Office on Disability, and other community partners to ensure voters with disabilities can cast their vote privately and independently.

7) Minority language resources

As under the current polling place model, any voter in a VCA model election would be able to vote and/or receive in-person assistance in their preferred language. To that end, each vote center would be supplied with official and sample ballots in all federally and locally mandated languages: English, Chinese, Filipino and Spanish as well as translated reference ballots in languages required under state law: Burmese, Japanese, Korean, Thai, and Vietnamese.

To maximize the effectiveness of in-person language assistance, the Department would staff vote centers located in or adjacent to precincts meeting the requirements listed in §203 of the federal Voting Rights Act for in-person language assistance with staff fluent in those languages. As part of this process, the Department would solicit public input and would make every effort to recruit and assign bilingual staff to vote centers located in areas with denser minority language populations. To supplement in-person language assistance, the Department would continue to utilize its telephone interpretation service, which provides assistance in over 200 languages.

In addition to posting multilingual notices describing all minority language voting materials and interpretation services at vote centers, vote center staff would wear name tags showing the languages each staff member speaks, just as poll workers do at polling places. The Department would continue to comply with all language related election law to ensure that all eligible San Franciscans, including those with limited English proficiency, have equal and easy access to translated materials and language services. As part of its ongoing effort to provide effective language assistance and translated materials, the Department would continue seeking feedback from members of its LAAC and other interested local community partners on matters related to language access.

c. Ballot Drop-Off Services

In any election conducted under the VCA elections model, the Department would need to organize and open approximately 35 ballot drop-off locations across the City starting at least 28 days before Election Day. Such ballot drop-off locations would provide voters a secure and convenient option for returning their voted ballots. Although the ballot drop-off sites would be available for a longer period, there would be a reduction in the number of sites on Election Day, as compared to the number of ballot drop-off sites available under the current polling place model.

In recent elections, all of the City's 588 polling places served as ballot drop-off sites and voters could visit any polling place to return their ballots. The Department also offered ballot return services at its main City Hall and auxiliary vote centers. For the November 3, 2020 election, the Department further expanded ballot drop-off services, opening 11 drop-off stations in the City, one in each Supervisorial District.

2. Staffing and Staff Training

I. Staffing Resources

In the months leading up to each election, the Department hires many temporary employees to aid its full-time staff with pre-election and post-election tasks, including candidate filings, maintenance of voter records, selection and preparation of in-person voting sites, vote-by-mail ballot envelope signature comparison, processing and counting of voted ballots, and canvass auditing processes. In each election, the Department also recruits approximately 2,500 poll workers, each of whom typically receive a stipend of approximately \$200 for serving voters on Election Day.

In recent elections, the Department has assigned 3-5 poll workers to each polling place and, to provide support to those poll workers, has hired approximately 70 roving Field Election Deputies (FEDs) and organized a 40-person phone bank tasked with answering poll worker calls.

To staff multi-day vote centers, the Department would need to employ a different staffing model, hiring salaried temporary employees in place of stipend-paid volunteer poll workers. The Department expects that approximately eight (8) to fifteen (15) employees would be necessary to staff each vote center, with more staff needed during busier times as Election Day approaches. (When staffing vote centers, the Department would consider both the proximity to Election Day and projected turnout at each vote center.)

Several factors would contribute to higher staffing needs per vote center under the VCA elections model, some of which are described below.

First, given that all 588 polling places would be replaced by approximately 53 vote centers, each vote center would need to be ready to serve a larger number of in-person voters. While the number of such voters, particularly on Election Day, might decrease due to increased service in the early voting period and the universal mailing of ballots, vote centers would need to be adequately staffed on all days, resulting in staffing needs early on.

Second, with new technology available at each vote center, vote center staff would be able to provide a more complex range of services to in-person voters. Providing these services would contribute to an increase in the average time required to process each voter, which, in turn, would increase staffing resource needs at each site.

Finally, while the transition to the VCA elections model would reduce the number of roving FEDs required to support poll workers at approximately 588 neighborhood polling places on Election Day, the transition would simultaneously necessitate an increase in staffing resources to support 53 vote centers over the course of ten voting days as well as on Election Day.

a. Recruitment, Hiring, and Onboarding Process

Since the Department would need to hire many temporary workers to conduct a VCA model election, the Department would need to adjust its hiring practices accordingly. Implementing such changes could pose several challenges, some of which are discussed below.

First, the Department would need to begin by recruiting approximately 500 temporary employees to work at vote centers for a period of several weeks. Although the Department could begin this process by attempting to recruit former poll workers to serve as vote center staff, it is likely that many poll workers who have successfully balanced their one-day Election Day service with other personal commitments, such as work, family, or school, would not be able to commit to serving voters for several weeks. In addressing this challenge, the Department would need to increase its outreach and advertising channels, develop updated job advertisements and public service announcements about open-recruitment application process, and expand its community partnerships.

Second, unlike the relatively simple processing of volunteer poll workers, all staff serving at vote centers would need to complete the City's formal hiring processes. The hiring process for seasonal staff typically begins approximately 85 days before work begins. Steps in this process involve posting job descriptions on JobAps, reviewing applications, scheduling and conducting interviews, assisting new hires with completing the necessary paperwork, scheduling fingerprinting appointments, and obtaining staff clearance from the Department of Justice. Hiring more temporary workers would necessitate more time to

complete all the necessary hiring steps, placing significant human resource demands on both the Department of Elections and the Department of Human Resources (DHR).

Third, with recent hiring data in mind, the Department anticipates it would need to conduct interviews with approximately 800 applicants in order to fill approximately 500 vote center and roving support positions. In recent elections, the Department has incorporated efficiencies into its hiring process by facilitating group interviews. Even with these efficiencies, given the volume of temporary staff needed to work at vote centers, the Department would be required to coordinate and conduct approximately 50 group interviews. By contrast, the poll worker screening and onboarding processes are based on an online self-assessment, requiring a significantly lower commitment of Department resources and no involvement of DHR personnel.

Fourth, per operational timelines, the Department typically conducts interviews for staff in seasonal positions no fewer than 18 days prior to staff start date in order to accommodate the clearance processes established by the DHR, which include background checks and fingerprinting. However, based on the current number of fingerprinting appointments made available, the hiring of vote center staff would need to begin 4-5 months prior to the anticipated start date. This extended timeline would be impractical due to the short duration of employment and is incongruent with the citywide goal of decreasing lag times in its hiring, interviewing, and onboarding processes. Such an early timeline also presents issues related to staff retention and their changing economic circumstances.

Fifth, many vote centers would need to provide language assistance in all of the languages required under state and federal elections law. Consequently, the Department would need to hire a large number of bilingual staff to fulfill bilingual requirements set forth in the VCA. The VCA includes criteria to be used by any participating county in determining the minimum language assistance to be provided at each vote center, based on the location of each site, and further requires counties to provide additional language assistance at locations, as informed by the public feedback process. Recruiting bilingual temporary workers is likely to be more difficult than recruiting bilingual poll workers, given the greater time commitment involved.

b. Poll Worker Program

Due to the challenges of hiring, on-boarding, and training a large number of temporary staff to work at vote centers, pursuing a hybrid volunteer and temporary worker model might be a cost-effective approach to fulfilling in-person service needs in a VCA model election. Under this scenario, poll workers would be provided briefer training and given simpler, more discreet responsibilities (e.g. ,greeting voters, guarding ballot boxes, and assisting with line control) than regular vote center staff would be trained to complete.

In addition to yielding cost savings, this approach would have at least two major benefits. First, maintaining a poll worker program under the VCA would continue a civic tradition that has persisted for many years in San Francisco, allowing for a direct connection between public participation and elections administration, and enhancing public involvement in civic institutions. Second, maintaining the poll worker program would allow the City to continue to provide economic and skill-building opportunities for members of the public who benefit from the poll worker program's short duration and low barriers to entry relative to longer city employment, especially for high school student poll workers.

The main drawback of implementing a hybrid temporary vote center staff/poll worker approach would be that the Department would need to facilitate two separate, simultaneous recruiting, onboarding, and training programs, one for vote center staff and one for poll workers, and develop ways to clearly delineate the different responsibilities for each of these groups. Although

this approach would add a layer of complexity to recruitment, onboarding, and training programs, the advantage of preventing the loss of the poll worker program is likely to outweigh its challenges.

II. Staff Training

Prior to developing VCA training programs, the Department would need to evaluate and update most of its current election procedures and security protocols, and develop easy-to-use reference manuals and official elections forms. These steps would help ensure that any new training programs developed by the Department comply with state and local security standards, including those detailed in the California Elections Code and California Voting System Use Procedures, and reflect the necessary steps to set up and operate vote centers, process voters, and protect the integrity of vital election materials.

In recognition of the fact that development of effective staff training and intelligible reference materials would be integral components of the successful transition to the VCA, the Department would create comprehensive training programs for all staff, including vote center employees and those providing technical and compliance support. VCA training resources would cover a wide range of essential topics such as vote center set up, steps to properly assist voters and provide available services, equipment operations, as well as detailed instructions on how to safeguard ballots, equipment, and voter data at all times. VCA training curricula would need to introduce any new contingency plans designed to allow City voters to continue casting their ballots in a wide range of unexpected situations (e.g., power failure during voting hours, loss of equipment connectivity, etc.) that could potentially impact the ability of staff to maintain normal election processes.

The Department would need to develop and provide supplemental training for temporary staff serving as vote center leads. Such training would include emergency voting procedures, complicated voter-processing scenarios, monitoring the inventory of ballots and voting supplies, and coordination with roving support staff. In recent elections, the Department has been able to staff a relatively low number of vote centers with year-round staff, placing at least one experienced employee at each site, and leveraging existing IT resources to resolve any technical issues. Operating 53 vote centers under the VCA model in the same manner would not be possible, simply because the Department does not have a sufficient number of experienced employees to cover all sites. Consequently, most vote centers would be staffed exclusively with temporary staff, and providing extensive customized training to site leads would be critical to successful operation of those sites.

The Department would also need to develop separate training for Deputy Sheriffs, with a focus on expanded collection related duties such as daily retrieval and transport of voted ballots and memory cards from vote center and ballot drop-off locations to a central ballot-processing facility. In providing this training to collection officers, the Department would emphasize the importance of maintaining complete chain of custody records, with chronological, transport, collection, and transfer recorded for all voted ballots.

Finally, the Department would prepare training for its City Hall phone bank staff and roving support personnel such that they could effectively assist vote center staff in resolving any unusual situations. These support personnel would learn about emergency procedures and would be provided with copies of an Incident Response Plan designed to allow elections operations to continue in the event of any disruption in normal election services. This training would address response recovery strategies for critical processes and explain how to initiate alternate forms of communication and utilize alternate tools and facilities in the case of a natural disaster, such as an earthquake, or a human-caused disturbance, such as a protest, that might impede normal election processes.

In developing a VCA training program, the Department would incorporate multiple teaching strategies and build on the recent successes of its current poll worker and vote center staff training programs, updating its presentations, hands-on practice sessions, illustrated training manuals, and supplementary videos.

To familiarize all staff with daily opening and closing procedures, and types of services to be offered at vote centers, the Department would provide a portion of training online via a self-guided or real-time presentations – allowing staff to attend some of their training at home would reduce space, human resources, and equipment needs. To accommodate employees without access to computers at home, the Department would offer training at City Hall, most likely as a combination of self-guided and real-time presentations.

Although in recent elections, online poll worker training has proven to be a successful method for introducing Election Day duties and procedures, the Department’s in-person “equipment labs” have nevertheless remained an essential component of poll worker training. Equipment labs for vote center staff would need to provide the same opportunity, but also present a wider range of technical topics, including ballot-issuing procedures, the operation of voting equipment, printers, etc.

Although the total number of election workers to be trained would be greatly reduced in a VCA model election (approximately 500-800 temporary staff would require training versus approximately 2,500 poll workers), implementation of the VCA would nevertheless require a significant allocation of internal staffing resources to develop new training programs and materials that reflect procedures and policies for administering elections under the new model.

3. Location and Operation of Potential Vote Centers and Ballot Drop Off Locations

I. Vote Center Placement and Operation

If San Francisco were to adopt the VCA elections model, the Department would need to replace 588 neighborhood polling places with approximately 53 vote centers. Although there would be fewer in-person voting sites, each vote center would be open for service before Election Day and could serve any voter in the City.

More specifically, the VCA includes ratios to be used by any adopting county in determining the minimum required number of vote centers based on the number of registered voters in that jurisdiction 88 days before Election Day. Based on the number of registered voters in San Francisco as of the time of this writing (511,474), the Department would need to provide at least 11 vote centers starting 10 days before Election Day (1 per 50,000 voters for at least 8 hours each day), at least 53 vote centers during the last 4 days of the voting period (1 per 10,000 voters for at least 8 hours a day), and at least 53 vote centers on Election Day (1 per 10,000 voters from 7 a.m. to 8 p.m.).

Beyond complying with the VCA’s vote center ratio, the Department would continue to operate its main vote center at City Hall, which has traditionally opened 29 days before Election Day. Continuing to operate the City Hall Vote Center for all four weeks of the voting period would allow the Department to provide consistent service to any voters who choose to register to vote, update registration, vote in person, or pick up ballots through the duration of the voting period.

In selecting each vote center location, the Department would consider specific criteria listed in CAEC §4005(a)(10)(B). Such criteria include the proposed site’s proximity to 1) public transportation, 2) communities with low vote-by-mail usage, 3) population centers, 4) language minority communities, 5) voters with disabilities, 6) communities with low car ownership, 7) low-income communities, 8) communities with historically low voter registration, and 9) geographically isolated communities,

as well as 10) access to free and accessible parking, 11) voter travel time, 12) in-person ballot drop-off alternatives, 13) traffic patterns, and 14) the feasibility of mobile vote center deployment.

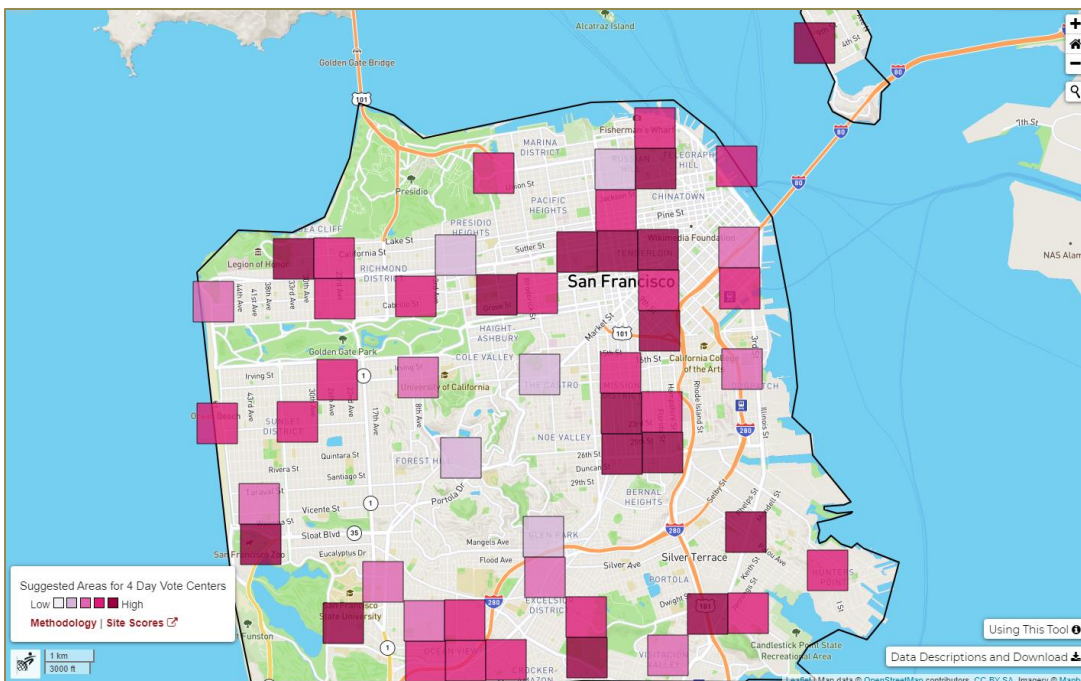
Given that the VCA requires all transitioning counties to develop their VCA Election Administration Plan (EAP) in consultation with the public, the Department would involve members of various communities in the vote center selection process and consider any additional factors revealed during that collaborative process, in addition to the criteria specified by the code.

In undertaking simultaneous evaluation of all vote center placement criteria and identification of potential sites, completed in cooperation with a number of local partners, officials, and interested members of the public, the Department would employ a multi-step process through which all relevant data would be collected, organized, and presented in an equitable, efficient, and transparent manner. Such a process would include: 1) a consideration of City areas for placement of vote centers, 2) an evaluative audit of all existing polling places, 3) a research of new potential locations, 4) the creation of a series of thematic, color-coded maps reflecting data relevant to the placement criteria required under the VCA, 5) the incorporation of additional factors based on public feedback, 6) the tentative ranking and selection of vote center site locations, and 7) the inclusion of the tentative site list into the draft EAP.

a. Technological Tools

In identifying the City's vote center locations, the Department would use a tool made available by the Center for Inclusive Democracy (CID). The CID has compiled many demographic data of the electorate in California, including the City and County of San Francisco, and incorporated that data into an online *California Voting Location Siting Tool* that can be viewed at <https://ca.cidsitingtool.org>. This tool has been designed to aid county elections officials in identifying optimal voting locations, suggesting areas for placement of vote centers based on the demographic data the VCA requires elections officials to consider.

For reference, the screenshot below shows the tool's 53 suggested vote center locations for San Francisco, based on the data already incorporated into the tool:



In addition to choropleth maps reflecting each of the VCA criterion that could be generated by the CID siting tool, the Department would also develop and make publically available custom layered maps, showing specific combinations of the VCA criteria as well as a “master vote center placement map” which layered all 13 legally required criteria onto one map. Such a master vote center placement map would allow the Department to rank all potential sites both graphically and numerically, a strategy that would aid in facilitating public input on potential sites during collaborative planning process.

b. Availability of Private and Public Sites

Although technological tools such as the CID siting tool could provide an efficient way to assess the vote center placement suitability of different areas and neighborhoods in the City, such tools are not designed to identify specific buildings. Consequently, the Department would need to conduct an extensive research of potentially suitable buildings across the City, focusing on three characteristics: 1) lease availability (in the 1-2 week period before Election Day), 2) layout and square footage, and 3) proximity to accessible and free parking.

The Department would begin such a research by considering all sites previously used as polling places, including both public sites, such as schools, libraries, recreation centers, firehouses, etc. and private sites, such as shops, residential garages, apartment lobbies, places of worship, etc.

The Department anticipates that it would not be practical for most private property owners, who have allowed the Department to operate polling places in their properties on past Election Days, to host election related activities for the one or two week periods mandated by the VCA. Compounding the issue of availability are the facts that 1) most private sites are relatively small and 2) most sites have limited or no parking.

With these constraints in mind, the Department anticipates that most vote center sites would need to be located in government or public buildings, such as those owned or operated by the San Francisco Unified School District (SFUSD), the City College of San Francisco (CCSF), the San Francisco State University (SFSU), the San Francisco Recreation and Park Department (SFRPD), the San Francisco Public Library (SFPL) sites, and other city and state owned facilities.

Although the Department has developed successful, one-day polling place lease relationships with a large number of local governmental agencies over the years, it is likely that securing many of the same sites for longer periods as vote centers would prove challenging, as this would have a much greater impact on agency operations.

c. Minimum Square Footage

In addition to being available during the appropriate periods, facilities chosen to serve as vote centers would need to be large enough to allow Department staff to safely and efficiently process a large number of voters. Based on the initial research, the Department estimates that, to accommodate six check-in/ballot issuing stations, 24 voting booths, and all necessary voting equipment, each vote center site would need to be located in a facility with at least 1,000 square feet.

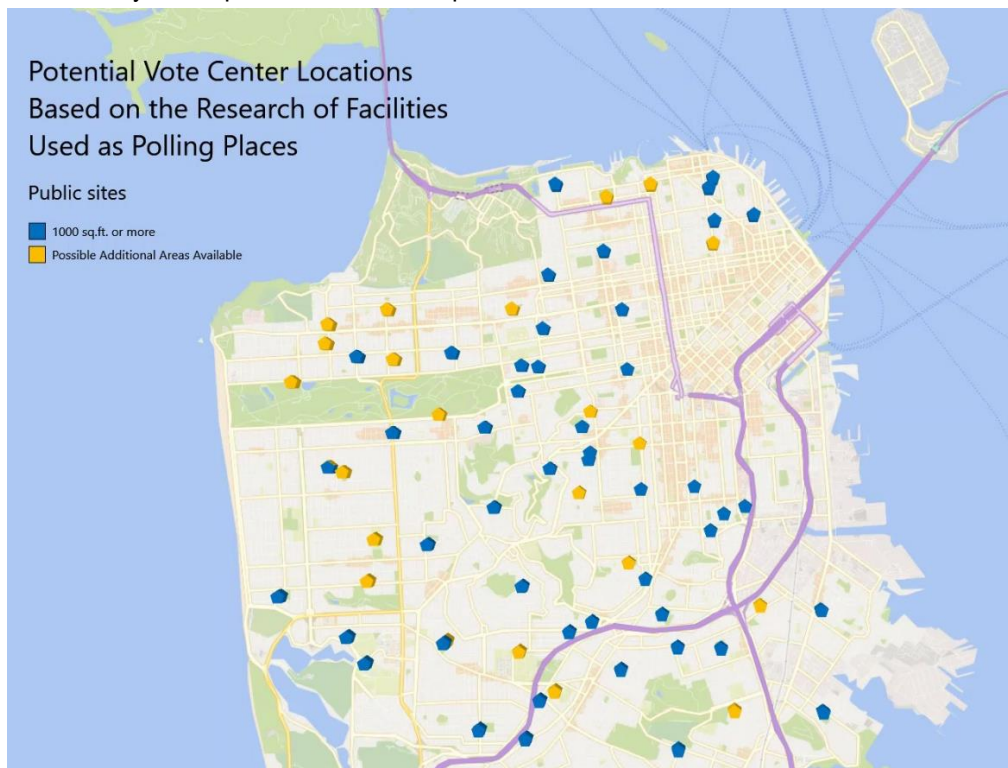
Of the 588 polling place sites used in the November 3, 2020 election, only 47 sites have voting areas larger than 1,000 square feet:

Facility Contact	Number of Sites
CCSF	1
SFRPD	11
SFPL	2
SFSU	1
SFHA	1
SFUSD	30
UCSF	1

Additional 23 polling place sites may have spaces large enough to serve as vote centers (smaller rooms have been used at these sites in the past, but other larger areas are available in the buildings):

Facility Contact	Number of Sites
CCSF	1
SFRPD	7
SFUSD	15

The map below illustrates the geographic distribution of the 70 suitable sites identified through the Department’s research, with notably fewer potential sites in Supervisorial Districts 4, 6, 9, 10, and 11.



d. Availability of Accessible Parking

In addition to being available and being large enough, vote center facilities would ideally be located adjacent to ADA accessible on-site parking. Based on the Department's initial research, of the 70 sites shown on the map above, only nine have on-site parking, with only five sites providing ADA compliant parking. (A review of all 588 polling place sites, including those likely to be unavailable for the VCA requisite periods or simply too small to serve as vote centers, revealed that only 23 have on-site ADA compliant parking.)

Another option that the Department could consider would be securing temporary street parking near vote centers. Under Title II of the ADA, any service provided as part of a public program must be ADA accessible, which means that, if San Francisco's vote centers provided parking, they would have to provide ADA compliant parking. Such parking must be located on ground with a less than 2% grade in all directions.

According to the Department's initial research, only five of San Francisco's 588 polling place sites might be suitable to serve as vote centers, be available during the requisite periods, be large enough to accommodate a flow of voters, and ADA accessible. Given that the majority of polling place sites have ADA accessible pathways but do not have ADA accessible parking, the Department anticipates that locating sites with ADA accessible parking facilities would prove even more challenging than finding sites that satisfied other criteria.

e. Community Feedback on Vote Center Placement

Given that CAEC §4005(a)(4)(D) requires vote centers to be "equitably distributed across the county so as to afford maximally convenient options for voters", and given that the number of sites required for the earlier voting period is already equal to the number of San Francisco's Supervisorial Districts, the Department would begin with a tentative plan to operate one vote center in each of these 11 Supervisorial Districts, adding several more sites in each district to achieve an equitable distribution of 53 in-person voting sites across the City for the latter part of the voting period.

To ensure a maximally equitable and transparent vote center placement process, one in which all public feedback is adequately addressed, the Department would engage a demographically diverse group of participants, inviting City residents and local community leaders to comment on proposed locations and suggest alternatives. In addition to holding a series of public meetings and working closely with members of the Language Accessibility Advisory and Voting Accessibility Advisory Committees, the Department would also develop and make available an online *Vote Center Location Selection Suggestion Form*, allowing any interested members of the public to submit feedback on proposed locations and site preferences.

Were the City to adopt the VCA elections model, this period of demographic and geographic analysis would begin immediately after the Department researched and compiled a tentative list of vote center sites, with public outreach and responsive revisions of the site list completed simultaneously, all over a period of approximately 4-5 months. The final EAP plan, as approved by the SOS and posted on the Department's website, would list the 53 locations identified by the Department as most suitable for use as vote centers as well as locations of alternative sites, to be used as "backup" options in the event the best sites become unavailable.

f. Vote Center Layouts

In designing vote center layouts, the Department would strive to ensure that each site allowed for optimal processing flow while providing ample space for private ballot-marking areas. To this end, all vote center layouts would incorporate the four

main steps of the voting process: 1) check-in/registration, 2) ballot-issuing, 3) ballot-marking, and 4) ballot drop-off. Voters whose records could not be found in the voter registration database in the first step of the process would be redirected to a designated conditional registration processing station.

Although the exact layout of each vote center would be customized with that site's size and structural characteristics in mind, the Department would also develop general, ADA compliant layout guidelines to be applied to all 53 vote centers. To assist staff with setting up vote centers while adapting to the specific features of each location, the Department would create 53 site-specific diagrams, with recommended placements for check-in stations, voting booths, voting equipment, and ballot drop-off boxes, as well as easy-to-read signs to guide voters through the voting process.

Given that each vote center would need to serve a neighborhood previously served by approximately 10 polling places, the Department would ensure adequate space for, a minimum, six check-in/ballot issuing stations, three accessible ballot-marking devices, and 24 voting booths at each vote center. During the VCA planning phase, layouts for sites in neighborhoods with historically high voter turnout (e.g., the UCSF campus), would be modified to include additional processing stations, voting equipment, booths, and ballot boxes.

Each vote center would also be supplied with a set of multilingual signs indicating that site's hours of operation, the types of service available to voters, the languages spoken onsite by bilingual staff, and the accessible voting tools available.

g. Security and Continuity of Operations

The Department would undertake all necessary planning steps to ensure the confidentiality, integrity, and security of voter data, voted ballots, and other vital materials at all vote centers. To this end, the Department would develop a VCA Physical Security Plan explaining all of the relevant standards and procedures to be used by staff charged with safeguarding ballots, equipment, voter data, and facilities used as vote centers.

The Department would also develop a VCA Incident Response Plan designed to maintain elections operations in the event of potential disruptions such as fire, protest, or earthquake.

Both plans would need to be developed with careful consideration of and strict adherence to all security related elections laws and regulations in order to preserve the integrity of the City's free, fair and functional election processes. Both plans would be paramount to enabling the Department to overcome any potentially disruptive incident involving voting equipment, key personnel, or database connectivity, ensuring uninterrupted voting across the City.

The integrity of every election depends on the physical security of voted ballots, voting equipment, and other vital election materials, and given that this physical security in turn depends on the reliability and competence of the personnel handling of these vital items, the Department would thoroughly train all staff assigned to work at vote centers as well as those who would provide technical support, on all security procedures. Among other topics, staff would learn how to document chains of custody of all vital election materials and how to maintain critical processes in circumstances that could impede normal election processes.

II. Ballot Drop-Off Box Placement and Type

Were San Francisco to transition to the VCA elections model, vote centers would not be the only in-person ballot return locations. CAEC §4005(a)(1)(A) requires any voter also be able to return their vote-by-mail ballot to one of the ballot drop-off locations and provides a ratio for determining the number of such locations. Based on the number of registered voters in San Francisco as of the time of this writing (511,474), the Department would need to provide at least 35 ballot drop-off locations

(1 per 15,000 voters open during regular business hours, with one drop-off location open at least 12 hours per day) starting 28 days before Election Day.

Given that these 35 ballot drop-off sites would need to be located with CAEC §4005(a)(10)(B) criteria in mind, the same criteria used to select vote center locations, the selection of ballot drop-off sites would be completed in tandem with the vote center placement process, using parallel structural and equity criteria, and extensive public feedback.

Although the VCA does not specify the exact type of ballot drop-off boxes participating jurisdictions must use at selected locations, state law describes two main types: staffed and unstaffed boxes. Per California Administrative Code (CAC) §20131, a staffed drop box is “a drop box or a secure ballot container placed in a location that is in view of a live person who is employed at the location of the drop box, a city or county employee, or a temporary worker or volunteer retained for the purpose of monitoring the drop box”, while an unstaffed drop box is “a secured drop box that is not within view of a live person for monitoring and is available for use by a voter 24 hours a day”. State law also provides guidance on how to properly assist voters at these sites and how to safeguard and transfer voted ballots from the boxes to a central ballot-processing location.

Both staffed and unstaffed ballot box models have their own set of advantages and disadvantages, which are briefly described below.

a. Staffed Ballot Drop-Off Boxes

The main advantage of using staffed ballot drop-off boxes would be that Department personnel could provide assistance to people dropping of voted ballots. Staff could provide personal assistance in multiple languages, offer replacement ballot return envelopes and/or “I voted!” stickers, remind voters to sign and seal their ballot envelopes, direct voters to vote centers as necessary, and answer frequently asked questions. Staff working at ballot drop-off sites could also monitor security and capacity of ballot boxes during their shifts, and report to the Department if any issues arose.

With regard to disadvantages of using staffed boxes, in addition to the fact that staffed boxes would not be available to voters 24 hours a day, maintaining a staffed ballot box model would lead to significant expenses.

For security reasons, the Department would need to assign 2-4 staff members to serve voters at each ballot drop-off location during regular business hours. In addition, staff members would need to remain onsite each day until custody transfer of voted ballots had been completed and the site had been closed.

In preparing staffing schedules for ballot drop-off locations, the Department would need to factor in the staff time required to set up and break down sites each day as well as the need to schedule roving support personnel to assist as needed, provide coverage for unexpected staff absences, and communicate with Department staff at City Hall regarding any issues. The Department would also incur additional costs either to rent an overnight storage space near each site or to rent vehicles to transport necessary materials to and from each location on a daily basis. Finally, the Department would incur some additional costs to reserve parking at ballot drop-off box sites for supply delivery and retrieval, and to provide restrooms (porta potties) for staff at any sites lacking those amenities.

b. Unstaffed Ballot Drop-Off Boxes

The main advantage of using unstaffed ballot drop-off boxes would be that voters would be able to return their ballots at any time beginning 28 days before Election Day. Such 24/7 service would be convenient to voters and would greatly simplify outreach messages about ballot return options. Although voters would not be able to receive in-person service at unstaffed

sites, the Department would encourage voters to contact the Department by providing signs with its toll-free multilingual voter support line. These signs could also remind voters about avoiding common mistakes, such as the failure to sign or seal a ballot return envelope.

Per CAC §20132, unstaffed ballot drop-off boxes must meet several criteria and be durable and secure enough to withstand “vandalism, removal, and inclement weather”, utilize clearly identified water-resistant and tamper-free ballot insertion slots, be clearly and visibly marked as an “Official Ballot Drop Box” in all required languages, and have a “distinct color” and a “no-glare finish.” The Department anticipates that purchasing code-compliant ballot drop-off boxes would be a relatively expensive investment, especially in the year of the first VCA election.

For unstaffed ballot box model, the Department would also need to secure an interdepartmental service agreement with the Department of Public Works (DPW) to facilitate the permitting and installation of boxes at sites per CAC §20135, which requires that unstaffed boxes “be securely fastened in a manner as to prevent moving or tampering, for example, fastening the drop box to concrete or an immovable object.”

While the unstaffed ballot drop-off boxes would not incur high onsite staffing costs, there would still be some human resources costs involved. More specifically, the Department would need to schedule at least one roving support staff to conduct regular site visits during the voting period to assess and address unexpected issues (e.g., graffiti, unscheduled street closure, temporary obstruction blocking the path of travel, etc.), and would also need to schedule several personnel on Election Night to ensure that all drop-off boxes were locked at exactly 8 p.m. (to prevent voters from casting their ballots after the polls had closed across the City). Due to the lower level of human resources costs, the City would be more likely to see cost efficiencies in the second or third VCA model election using an unstaffed ballot drop-off box model than for a staffed model.

Regardless of the type of ballot drop-off box used, the Department would need to abide by a number of local and state laws that set requirements for collecting and safeguard voted ballots. For example, the San Francisco Charter §13.104.5 charges the Sheriff with responsibility “for transporting all voted ballots and all other documents or devices used to record votes from the polls to the central counting location and approving a security plan for the ballots until the certification of election results.” Accordingly, the Department would need to work with the Sheriff’s Department to regularly retrieve voted ballots from ballot boxes and transport them to a central ballot-processing site.

4. Voting Equipment and Capacity

I. New Voter Processing Technology

Were the City to transition to the VCA elections model, any eligible San Francisco voter would be able to receive and/or cast a ballot at any vote center in the City, regardless of the voter’s residential address.

To facilitate a voter check-in process, vote center staff would need to be able to access current voter registration data to check each voter’s registration status, precinct number, and recent voting history, and then issue a ballot listing contests appearing in the voter’s precinct, as determined by the combination of voting districts.

To ensure efficient and secure processing of voters at any vote center, the Department would need to supply each vote center with the new voter processing technology that has not been available at polling places: Electronic Poll Books and Ballot on Demand Printing System.

a. Electronic Poll Books

Under the current polling place model, the Department supplies each polling place with a paper roster which lists the names and addresses of all registered voters within the polling place's precinct boundaries, along with notes about each voter's language preference, VBM ballot receipt/return status, and whether the voter needs to supply a form of identification to comply with requirements of the federal Help America Vote Act. On Election Day, poll workers use these paper rosters to check in voters and determine whether each voter is eligible to vote a standard or provisional ballot.

When the paper roster lists a voter as properly registered in the precinct, the voter can be issued a standard ballot. However, if the poll worker finds the voter is not listed on the precinct roster (which could indicate they are not registered anywhere in San Francisco), the voter is issued a provisional ballot instead. The reason for voting provisionally is twofold: first, because poll workers do not have access to voter registration data and cannot check the voter's eligibility or voting history status, and second, because the voter uses a ballot designed for residents of a different precinct and only the contests in which the voter was eligible to vote can be counted.

Under the VCA elections model, traditional paper rosters with their limited and static voter information would become obsolete. To facilitate voter processing at vote centers, the Department would seek to purchase electronic poll books (E-Poll Books), replacing paper rosters.

An E-Poll Book is the combination of electronic hardware and software used to facilitate the secure electronic transfer of data between vote centers and local voter registration database, the Election Information Management System (EIMS.) EIMS exchanges information with VoteCal, the statewide voter registration database that, in turn, interacts and exchanges information with other California county election management systems and other state systems that hold information from the Department of Corrections and Rehabilitation, the Department of Public Health, and the Department of Motor Vehicles.

Using E-Poll Books, vote center staff would be able to determine whether each voter was eligible to participate in the current election and, if so, which ballot type the voter should receive. As a part of this process, the staff member would verify the voter's registration data, including name, address, date of birth, preferred language, party preference, and precinct, and check the voter's statewide ballot issuance and return status – all in real time since voter data would be updated continuously. (For security reasons, E-Poll Books do not store driver's license or social security numbers.)

The implementation of E-Poll Book based voter check-in process would allow the Department to operate multiple E-Poll Book check-in stations at each vote center. (This would be in contrast to the current process, under which each polling place is provided with a single roster and poll workers can consequently only process one voter at a time.) As voters arrive at a vote center, they would be able to choose from any available check-in stations. Once a voter reaches an E-Poll Book Clerk, the Clerk would be able to type in the voter's information, find a match, and ask the voter to sign the E-Poll Book digitally to confirm their identity before issuing a paper or accessible ballot.

In addition to providing the benefit of multiple check-in stations, E-Poll Books would allow vote center staff to process voters in line and/or to "dequeue" any voters with questions or needing special assistance which might otherwise slow down the check-in process.

The Department estimates it would need to deploy approximately 8-12 E-Poll Books at each of the City's approximately 53 proposed vote centers, for a total of 450-500 E-Poll Books. While the purchase of E-Poll Books would be a significant one-

time expense, this technology is critical to the successful delivery of services in VCA model elections, creating a better voting experience for voters and facilitating an efficient process for vote center staff.

Protecting voter data would be the primary focus of any security protocol developed by the Department to safeguard E-Poll Books. Such a protocol, designed with both physical and digital security in mind, would contemplate multiple security layers and would include procedures and forms developed for E-Poll Book handling, storage, functionality, and keeping chain of custody records.

To support the functioning of E-Poll Books, the Department would need to provide a cellular access point device, such as Cradlepoint, with at least two different cellular provider connections for failover, at each vote center. Prior to delivery of E-Poll Books to vote centers, Department IT staff would securely configure and preload voter registration data on E-Poll books. At vote centers, staff would then use the E-Poll Books to connect to the internet via Cradlepoint and communicate securely with the vendor's central server. E-Poll Books would then sync all subsequent changes to voter data via that server, which would communicate securely with the local EIMS registration system via an API, hosted inside the City network.

To protect the physical security of this technology, every E-Poll Book would be stored each night in a secure locked case, placed inside a secondary secured locked cage, with strict lock and key access procedures. In addition, all E-Poll Books would be programmed to allow only an authorized user to log in using a secure, monitored, logged, and auditable connection.

Department technical support staff stationed at City Hall would be able to utilize a central console to provide complete E-Poll book device management and monitoring capability, including patch management, data sync operations, remote deactivation, and GPS tracking.

Before utilization of E-Poll Books for any election, Department staff would conduct an extensive testing to verify and document the readiness of each E-Poll Book prior to its use at a vote center.

Additionally, any E-Poll Books used in California must have passed the rigorous certification rules set by the California of Secretary of State (SOS) and have been certified for use in California by the SOS. Currently, three vendors provide E-Poll Books certified in California.

b. Ballot on Demand Printing System

For every election, the Department produces the official ballot in different ballot types, with each type presenting a different combination of contests and being available in three bilingual versions and accessible formats. The number of ballot types in San Francisco ranges from 11 to approximately 40, depending on the contests appearing on the ballot. These different ballot types reflect two factors: first, San Francisco lies within a series overlapping federal, state, and local voting districts and voters living in different parts of the City are therefore eligible to vote in different combinations of contests, and second, state elections law requires the rotation of candidate names on ballots to mitigate the statistical advantage of a candidate's name appearing at the top of the candidate list for a contest.

Under the current polling place model, the Department supplies each polling place with pre-printed precinct-specific ballots of a single ballot type. Per §CAEC 14102, the number of ballots provided to each polling place must be greater than or equal to 75% of the number of registered voters in that precinct, with voter political party preferences considered in primary elections and voter language preferences considered in all elections. Since San Francisco's official ballots are bilingual (printed in

English and Chinese, Spanish or Filipino), the Department must also provide sufficient quantities of each bilingual ballot format to each polling place to serve voters requesting ballots in a particular language.

Each polling place is designed to serve voters living within its precinct; voters from other precincts must cast provisional ballots so that the Department can determine which contests, if any, can be counted (for example, if a voter living in Supervisorial District 5 votes at a polling place stocked with ballots presenting the Supervisorial District 10 contest, the selection in that contest cannot be counted since the voter was not entitled to vote in it). Under the VCA elections model, vote centers serve all local voters and stock a complete inventory of all ballot types for any given election.

Conducting an election under the VCA would require the Department to provide approximately 53 vote centers, each being able to furnish the correct ballot for any voter in San Francisco. Under this new election model, continuing to rely on an inventory of pre-printed paper ballots would be impractical, as vote centers would need to have very large quantities of pre-printed ballots on hand in all types and all languages, and the costs of printing, organizing, delivering, storing, and destroying unused ballots would likely be very high.

To successfully implement the VCA elections model, the Department would need to provide ballot on demand (BOD) printing technology, which is capable of printing any ballot type in any language, as well as small quantities of backup paper ballots at each vote center.

A BOD printing system consists of a printer, laptop, and software. The software loaded onto the laptop holds PDF ballot images of all ballot types and languages, for a given election, enabling vote center staff to print the correct ballot for every voter visiting the site.

All ballot PDFs stored on the laptop for printing are encrypted and can only be printed via the BOD software on the BOD printer. The BOD software generates a timestamped audit log of all system activities, including printing activity by each vote center staff.

Access codes are required for BOD system access during equipment preparation, testing and operation. These safeguards cannot be bypassed or deactivated during system installation or operation, maintaining the integrity of the election data and audit record.

Any BOD printing system used in California must have passed the rigorous certification rules set by the California Secretary of State (SOS) and have been certified for use in California by the SOS.

The Department would also need to seek approval of the SOS to use a BOD system in San Francisco. To seek the approval, the Department would be required to complete and submit an *Application for Jurisdictional Use of a Ballot on Demand Printing System*, describing 1) the ballot on demand system to be used; 2) the voting system in use by the county; 3) the process via which ballot cards would be printed; 4) whether ballots would be printed one at a time or in batches; and 5) the structure of any networked connections to the registration database or E-Poll Books. Completing this application would also require the Department to detail its planned policies and procedures related to secure transmission of ballot images and data; password rules; physical locking mechanisms and protection for devices and ballot paper; daily accounting for all types of ballots in use; chain of custody forms; and verification that every voter would receive a ballot of the correct type.

Dominion Voting Systems from which the Department currently leases the voting system to conduct elections in San Francisco provides BOD printing system that has been certified by the SOS. When the Department negotiated its current voting system

lease contract, Dominion Voting Systems agreed to support the City if the City were to transition to conducting elections under the VCA model. As such, assuming the SOS approves the Department's application for the use of BOD system, the Department would be able to use Dominion's BOD printing system under the terms of the current contract.

II. Voting Equipment

Under the current polling place model, the Department provides two pieces of voting equipment at each polling place: an accessible ballot-marking device (BMD) and a ballot-scanning machine (BSM). While, to facilitate accessible voting in VCA model elections, state elections law would require the Department to provide BMDs at vote centers, the law does not address whether or not the Department would need to provide BSMs.

Since the VCA explicitly discusses BMD requirements but is silent with regard to BSM requirements, California counties adopting the VCA must decide whether to tabulate standard ballots at vote centers or use central ballot tabulation. Consequently, different VCA participating counties have provided different standard ballot casting options at vote centers, with the counties of Fresno, Glenn, Mono, Santa Clara, Shasta, Siskiyou, Tehama, and Tulare providing BSMs and the counties of Sacramento and San Mateo directing voters to place their ballots into secure ballot boxes for later tabulation at a central location.

In other words, in a VCA model election, the Department would have two options: 1) provide BSMs to facilitate an on-site ballot tabulation at vote centers (the process currently established at polling places), or 2) forgo BSMs and instead collect voted ballots in secure ballots boxes for tabulation at the Department's ballot processing location (the process currently established at the City's voting centers).

a. Ballot-Marking Devices

A ballot-marking device (BMD) provides any voter with an autonomous voting experience; the BMD user can mark a ballot using a touch screen, audio tactile device (ATI), or their own portable assistive aid, such as a "Sip and Puff" or paddle selection device. The size of the BMD's screen font can be changed, its default contrast can be switched to a white on a black background, and an ATI can be used to navigate, mark, and review a ballot.

The ATI unit is equipped with a volume-controlled audio voting component that allows voters to listen to their ballot, adjust the pace of speech (if needed), and make their choices. The ATI also has a full range of buttons for navigation with corresponding brail descriptions and inputs for "Sip and Puff" or paddle selection devices.

A key security feature of the BMD is the device produces a paper ballot, which supports end-to-end auditability from paper ballot to tallied cast vote record. After marking a ballot on a BMD, a voter prints and then casts their marked paper ballot.

Per CAEC §4005, the Department would provide each vote center in a VCA model election with a minimum of three BMDs and might provide additional devices at certain sites, based on voting area size and voter needs. All BMDs would be programmed with all of the City's ballot types and languages, allowing any local voter to mark the appropriate ballot at any vote center.

Under the current contract with Dominion Voting Systems, the Department leases a sufficient number of BMDs to supply all vote centers in the City, as well as back up units, in full compliance with the provisions of the VCA.

b. Ballot-Scanning Machines

A ballot-scanning machine (BSM) allows a standard voter to scan their ballot after marking the ballot at an in-person voting site. If a BSM detects any irregular marks (e.g., two selections in a Choose One contest), a warning message appears on the screen in the voter's preferred language, prompting the voter to CAST the card as is or RETURN the card for correction.

BSMs also tally and store cast ballot cards and vote data, with physical ballot cards stored in the machine's secure bin and vote data along with ballot card images in the machine's memory cards. After the close of the polls on Election Night, both voted ballots and memory cards from BSMs are securely transported to the Department. Department staff then upload the results from memory cards and include vote cast data in the preliminary elections results released on Election Night.

BSMs cannot be used by provisional voters or those dropping off VBM ballots, who must instead enclose their ballots in ballot return envelopes before depositing these envelopes into secure ballot boxes for later processing, scanning, and tallying in accordance with state elections law.

Under the current election model, the Department provides a BSM at every polling place.

Under the VCA elections model, were the City to decide not to offer BSMs at vote centers, then all voters (vote-by-mail, provisional and standard) would deposit their marked ballots into sealed and secured ballot boxes for later scanning and tallying at the Department's central ballot processing location. Although eliminating BSMs would have the advantages of being cost efficient, it would provide for a different voting experience for voters who have traditionally voted at the polls. Specifically, standard voters would no longer be able to observe their ballots being tabulated on site or be alerted to any ballot marking errors that would otherwise be identified in the scanning process by the BSM.

Were the Department to provide BSMs at vote centers, the Department would incur additional costs resulting from testing, deployment, and support of a large number of BSMs, increased staffing at each vote center (one staff member would need to be stationed near the BSM to prevent voters with VBM or provisional ballots inserting their ballot cards into the machine), and securing services of Deputy Sheriffs to collect memory cards from each vote center and transport them to the Department every day on which vote centers are open. Providing BSMs at vote centers would also introduce complexities in voter processing for vote center staff due to variations in ballot casting methods among VBM, provisional and standard voters.

Were San Francisco to transition to the VCA elections model, the Department would work with its community partners, including the LAAC, the VAAC, the Office of Racial Equity and other City departments and agencies with an interest in elections procedures, before making a final decision regarding the deployment of BSMs.

5. Ballot Collection and Processing

I. Ballot Retrieval Personnel and Protocols

Were San Francisco to transition to the VCA elections model, any voter could choose to return their VBM ballot either by mail or by delivering it to one of the City's approximately 35 ballot drop-off boxes or approximately 53 vote centers. Voters would also be able to visit any vote center to cast a ballot on site. In accordance with CAEC §4005, the Department would make all ballot drop-off boxes available 28 days before Election Day, open approximately 11 of the City's vote centers 10 days before Election Day and the remaining 42 vote centers 3 days before Election Day, with all sites remaining operational through the close of polls on Election Night.

To ensure secure and efficient transfer of voted ballots from all drop-off boxes and vote centers to the Department throughout the entire voting period, the Department would develop new ballot retrieval and transfer of custody protocols. Such protocols would be based on the current protocols for retrieving ballots from polling places on Election Night, but designed to span several weeks of activity, rather than only several hours on a single day. When developing these new protocols, the Department would need to comply with state and local election law that governs how ballots and vote count data must be collected, safeguarded, and reconciled.

Under the VCA elections model, the ballot retrieval and transfer protocols would need to comply with California Administrative Code (CAC) §§20131 and 20137, which require designated ballot retrievers to be “authorized county employees, representatives, poll workers, or vote center workers, authorized by the elections official to retrieve ballots from drop boxes, or temporary workers or volunteers retained and authorized by the elections official to retrieve ballots from drop boxes” and to work in pairs, wear identification badges, and be sworn in on the state constitution.

More specifically, the ballot transfer protocol would need to comply with San Francisco Charter §13.104.5, which charges the Sheriff with responsibility “for transporting all voted ballots and all other documents or devices used to record votes from the polls to the central counting location and approving a security plan for the ballots until the certification of election results.” In other words, in San Francisco, in a VCA model election, Deputy Sheriffs would maintain the responsibility for retrieving voted ballots from drop-off boxes and vote centers and transporting the ballots to the Department according to the schedule and custody transfer protocol set by the Department. (If the Department were to provide ballot-scanning machines at vote centers, as described in *Section B. 4. II. Voting Equipment*, then Deputy Sheriffs would also need to transport memory cards from the machines at the end of each day any vote center was open.)

While Deputy Sheriffs would need to complete a ballot retrieval process at all vote centers daily, after the sites close, the schedule for collecting ballots from drop-off boxes would depend on the type of boxes used in San Francisco. If staffed boxes were to be used (a person is employed at the location of the drop-off box to monitor the box), then Deputy Sheriffs would need to collect ballots from such boxes daily, shortly after the sites had been closed. If unstaffed boxes were to be used (a secure drop-off box is installed at the location and is available for use 24 hours a day), then Deputy Sheriffs would be required to collect ballots from such boxes every four days, up through ten days before Election Day, and then every day after that.

The number of sites from which ballots would need to be collected, combined with the fact that a secure ballot collection process would need be completed regularly across the City over 28 days rather than only on a single day (Election Day), would necessitate the Department to expand the scope of its interdepartmental service agreement with the Sheriff's Department.

Under the current polling place model, the Department secures services of approximately 115 Deputy Sheriffs, each charged with retrieval of voted ballots from approximately five polling places on Election Night.

Under the VCA elections model, the Department would need to seek services of fewer Deputy Sheriffs but for a longer period. Based on the Department's initial estimate, to retrieve ballots from vote centers, the Department would require services of three Deputy Sheriffs starting ten days before the election, adding additional 11 Deputy Sheriffs starting three days before the election. To facilitate the retrieval of ballots from drop-off boxes, the Department would require assistance of approximately nine Deputy Sheriffs during a 28-day period.

To facilitate timely and secure retrieval of ballots from each location, the Department would develop and provide to Deputy Sheriffs a daily schedule for ballot collection at each site as well as procedures and forms for maintaining complete and chronologically accurate chain of custody records for all ballots transferred from vote centers and ballot drop-off boxes to the Department. All such transfers would need to be witnessed on a *Ballot Custody Transfer Form* by both Deputy Sheriffs and Department personnel.

a. Ballot Collection Center

Under the current polling place model, the Department organizes two collection centers on Election Night to facilitate deliveries of memory cards by Municipal Transportation Agency (MTA) officers and voted ballots and other vital election materials by Deputy Sheriffs: 1) a Data Collection Center to receive memory cards at City Hall's McAllister Street entrance, and 2) a Processing Center to receive voted ballots, rosters of voters, and other vital election materials at the Department's warehouse at Pier 31.

In recent elections, the Department assigned approximately 80 staff members to perform a number of tasks at its collection centers, including directing traffic, unloading vehicles, maintaining custody transfer records, and organizing all of the materials delivered by hundreds of MTA officers and Deputy Sheriffs. Successfully completing these activities requires a great deal of internal planning and coordination, as well as cooperation among poll workers, Department staff, and ballot collection officers, to ensure the "one night event" goes as planned and there are no delays in either the transport or processing of voted ballots.

Under the VCA elections model, the Department would develop new processes and procedures for a ballot collection center that would need to be staffed and operational beginning the first week of the early voting period and remain open up through Election Day. Such a multi-day collection center could potentially be located at City Hall, the Department's warehouse, or a leased location. If the collection center were located outside of City Hall, the Department would need to seek additional services from the Sheriff's Department to provide security during daily transport of vote-by-mail (VBM) ballots from that collection center to City Hall for processing.

Additionally, the Department would also develop and implement procedures for the daily reconciliation of ballots delivered to a ballot collection center from all of the City's vote centers and ballot drop-off sites.

II. Ballot Processing

In a VCA model election, the Department would need to process VBM, provisional, and standard ballots and most of the Department's current ballot processing procedures would remain in effect. Consistent with the current observation options provided by the Department, interested members of the public would be able to observe ballot processing in-person at the Department's facilities or via live-stream on sfelections.org.

Vote-By-Mail Ballot Processing

In a VCA model election, VBM ballot processing would continue to be comprised of four steps: 1) envelope scanning, 2) signature comparison, 3) ballot card extraction, and 4) ballot card scanning. Per CAEC §15101, the Department would commence processing VBM envelopes by completing the first two steps as soon as the first ballots were returned by voters after being mailed out 29 days before Election Day. Per the same code section, the Department would proceed to complete the last two steps beginning 15 days before Election Day, and tabulate and release preliminary election results after the close of polls on Election Night.

1) Envelope scanning

To increase the efficiency and accuracy with which VBM ballots are processed, the Department utilizes voter ID barcodes printed on all official VBM return envelopes. Upon receipt of VBM envelopes, Department staff scan these barcodes using the Agilis Ballot Sorting system. The information from each barcode is then linked in the Election Information Management System to the record of the voter to whom the ballot was issued, and the record is updated to indicate the ballot has been returned. During this process, the voter's signature on the outside of the return envelope is also scanned and added to the voter record; if the barcode is unreadable, the envelope is diverted by the Agilis system for manual review.

2) Signature comparison

Next, Department staff use a multi-stage process to review and compare the signature scans created in the first processing step with voters' signatures on file. If a signature image compares to any signature on file for the voter to whom the ballot was issued, the ballot envelope is accepted. If not, the voter's ballot must be challenged and the voter notified. The Department's multi-stage process ensures that no ballot is challenged for a signature-related reason unless the signature image has been reviewed by three different staff members and compared to all signature images in the voter's registration record. Once a batch of envelopes has undergone scanning and signature comparison, the batch is scanned again to separate accepted ballot envelopes from challenged ballots. Accepted ballot envelopes are then transferred to the ballot extraction team.

The Department attempts to contact voters with challenged ballots using several methods. First, the Department mails out a bilingual cure form, enclosed with a postage-paid return envelope, which explains the steps the voter needs to take to remedy the issue and allow the Department to count the ballot. Second, the Department notifies the voter via the online Voter Portal, where a digital copy of the challenge cure form is made available. Finally, if the voter has an email address or telephone number on file, the Department uses that information to contact the voter again, generally within one day of the ballot being challenged. Upon receipt of a challenge cure form via mail, email, fax, or hand delivery, Department staff scan the voter's new signature sample, link its image to the voter's file, accept the ballot, and forward the ballot to the ballot extraction team.

3) Ballot card extraction

As noted above, ballot extraction from accepted VBM envelopes can commence 15 days before the election. At this processing step, Department staff insert accepted ballot envelopes into OPEX high-speed extractors. After ballot envelopes are processed (slit open) by the extractor, staff manually remove and flatten individual ballot cards and ready them for scanning. Throughout the extraction process, staff are instructed to protect vote secrecy by keeping the side of each ballot envelope showing voter information face down. Once extracted and readied, ballot cards are placed in boxes and transferred to the scanning team.

4) Ballot card scanning

Department staff use Dominion ImageCast Central (ICC) scanners to capture images of accepted ballot cards and tally vote mark selections for inclusion in official election results. When a scanner reads a valid over-vote, under-vote, blank contest, marginal mark, or write-in vote, it diverts the ballot for manual adjudication (review). In some cases, a physically damaged or irregularly marked ballot will need to be remade (copied) onto a paper ballot and then rescanned. To ensure consistent processing, both remake and adjudication tasks are completed by two-person teams using standardized and illustrated procedures.

Provisional and Conditional Voter Registration Ballot Processing

Department staff process provisional (PV) and conditional voter registration (CVR) ballot envelopes by first entering the voter information written on the outside of envelopes into the Election Information Management System, verifying eligibility, and then completing the four steps described in the previous section. Under the VCA elections model, this process would continue to take place after Election Day. As discussed in *Section B.1.II. Services*, in a VCA model election, connectivity to the voter registration database at vote centers is likely to result in an increase in real-time voter eligibility verification and a corresponding decrease in post-election day processing of PV and CVR ballots.

Standard Ballot Processing

Under the current polling place model, standard ballots cast at the polls on Election Day are inserted by voters into the ballot-scanning machines that store vote count data on memory cards; data from these memory cards is then uploaded, tabulated, and included in preliminary election results on Election Night.

Were the Department to provide ballot-scanning machines at vote centers in a VCA model election, the current procedures for processing standard ballots would remain in effect, although memory cards would need to be transferred by Deputy Sheriffs to the Department's ballot processing location at the end of each day any vote center was open, rather than on Election Night only. Consistent with state law, the tabulation process would still occur on Election Night.

If the Department did not provide ballot-scanning machines at vote centers, the Department would need to modify its procedures for processing standard ballots. In this case, standard voters would cast their ballots into secure ballot containers, which would be transferred by Deputy Sheriffs to the Department's ballot processing location for scanning at the end of each day a vote center was open. Again, consistent with state law, the tabulation process would still occur on Election Night.

a. Ballot Processing Equipment and Space

The Department's current inventory of ballot processing equipment (inclusive of equipment either owned or leased), consists of the following:

- Agilis Ballot Sorting System (2)
- OPEX Ballot Extraction System (9)
- ImageCast Central (ICC) Scanners (16)
- Adjudication Workstations (18)
- Election Management System Workstations (used for results reporting/publishing) (12)

Prior to the November 3, 2020 election, in anticipation of record voter turnout and vote-by-mail ballot returns, the Department purchased additional ballot extraction equipment and expanded the capacity of its central scanners. Since the Department's ballot processing capacity was adequate for the November 2020 election, the Department does not anticipate needing to purchase any new equipment to support ballot processing in elections conducted under the VCA model.

Although the processing capacity of the Department's existing equipment is expected to be sufficient to conduct elections under the VCA model, the Department would likely need to identify additional space to relocate some of the equipment, which is typically staged at City Hall. During the November 2020 election, the Department leased a space at the Bill Graham Civic Auditorium for three months as a ballot processing center and consequently relocated some of its processing equipment from Room 59 at City Hall into that space. A similarly high volume of returned VBM ballots in a VCA model election would likely

necessitate a similar relocation, albeit to a space smaller than the area utilized at the Bill Graham Civic Auditorium, but larger than Room 59 at City Hall.

While the area inside the Bill Graham Civic Auditorium provided 44,000 square feet for the Department's ballot processing operations and proper social distancing, assuming that pandemic related health measures would no longer be required, the Department would need to seek a location with approximately 15,000 square feet to organize ballot processing in elections conducted under the VCA model. Were the Department to utilize its warehouse for ballot processing in future elections, some one-time modifications would be required to the building's electrical infrastructure, resulting in additional costs.

b. Reporting of Election Results

In a VCA model election, the Department would still release a first preliminary summary report of election results, with data from the VBM ballots received and processed before Election Day, at approximately 8:45 p.m. on Election Night, just as the Department does in elections held under the current polling place model. The Department would also still release a first preliminary Statement of the Vote, reports for any ranked-choice voting contests, and Cast Vote Record data at this time. Subsequent to the first preliminary election results report, the Department would release at least one more preliminary summary report of election results, with data from standard ballots cast at vote centers.

If no ballot-scanning machines were provided at vote centers in a VCA model election, then no memory cards with vote data would be uploaded on Election Night. Since the processing of standard ballots would not begin until the following day, the second preliminary election results report described above would only include vote data from standard ballots the Department processed before Election Day and would be the last report released on Election Night.

If ballot-scanning machines were provided at vote centers, then the reporting schedule on Election Night would follow the current schedule, with multiple preliminary election results reports released as memory cards retrieved from vote centers were uploaded into the tabulation system.

As under the current polling place model, ballot processing would continue every day after Election Day until the Department finished tabulating all VBM, standard, PV, and CVR ballots, with a new report released at approximately 4 p.m. every day on which ballots were counted. And, as under the current polling place model, CAEC §15372 would require the Department to certify election results within 30 days of Election Day, or in the case of local elections, no later than the last Monday before the last Friday of November.

Following certification, the Department would continue to publicly post images of all voted ballots online. These images would continue to be appended with "audit logs" showing how the voting system interpreted and tallied each vote mark, and when applicable, how the markings were adjudicated by Department personnel, thus providing interested members of the public with information about how the voting system operates and counts votes, and enabling the comparison of every digital ballot card image to the card's Cast Vote Record.

Section C

1. Implementation and Ongoing Costs for Conducting Elections Under the Voter's Choice Act

Should the City transition to the VCA elections model, the Department would incur both one-time implementation expenses and increased ongoing expenses as compared to those incurred under the current polling place model. These one-time implementation costs are expected to amount to approximately \$1.9 million, with the total estimated cost of conducting a single election under the VCA model approximately \$10.4 million; this latter estimate is \$1.1 million higher than the cost of conducting a single election under the current polling place model.

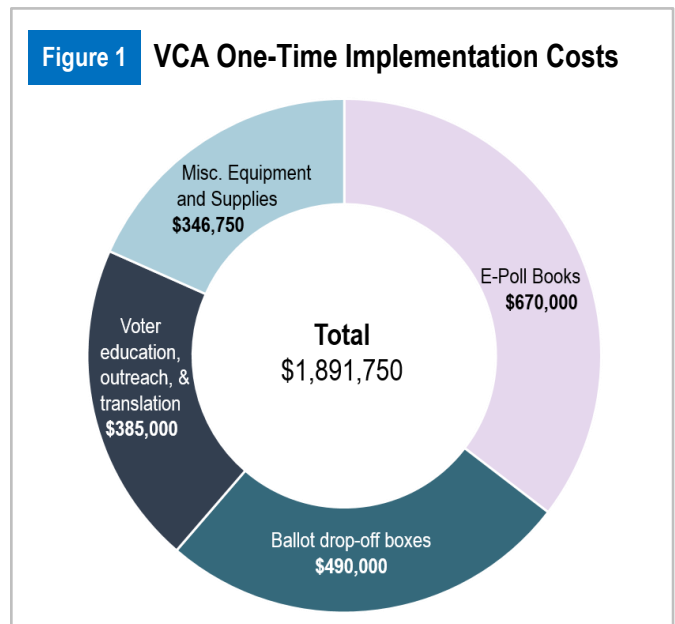
I. One-Time VCA Implementation Costs

As shown in [Figure 1](#), the most significant one-time costs associated with implementation of the VCA would be those related to 1) the purchase of 450 - 500 E-Poll Books to facilitate voter check-in process at vote centers; 2) the purchase of miscellaneous equipment to support E-Poll Books such as Cradlepoints and secure storage cases; 3) the purchase and installation of 35-40 ballot drop-off boxes, as mandated by CAEC §4005; and 4) the human resources/translation costs of developing VCA specific voter education and outreach programs about the new services and voting options available to local voters.

VCA specific outreach expenses would include those related to VCA focused grant partnerships with local community groups as well as the development of new multilingual VCA informational mailers, TV, and radio ads. VCA specific translation expenses would include a one-time investment to bring the Department in compliance with VCA language requirements. More specifically, the Department would need to hire five temporary staff (each fluent in one or more of the following languages: Burmese, Japanese, Korean, Thai, or Vietnamese) who would be tasked

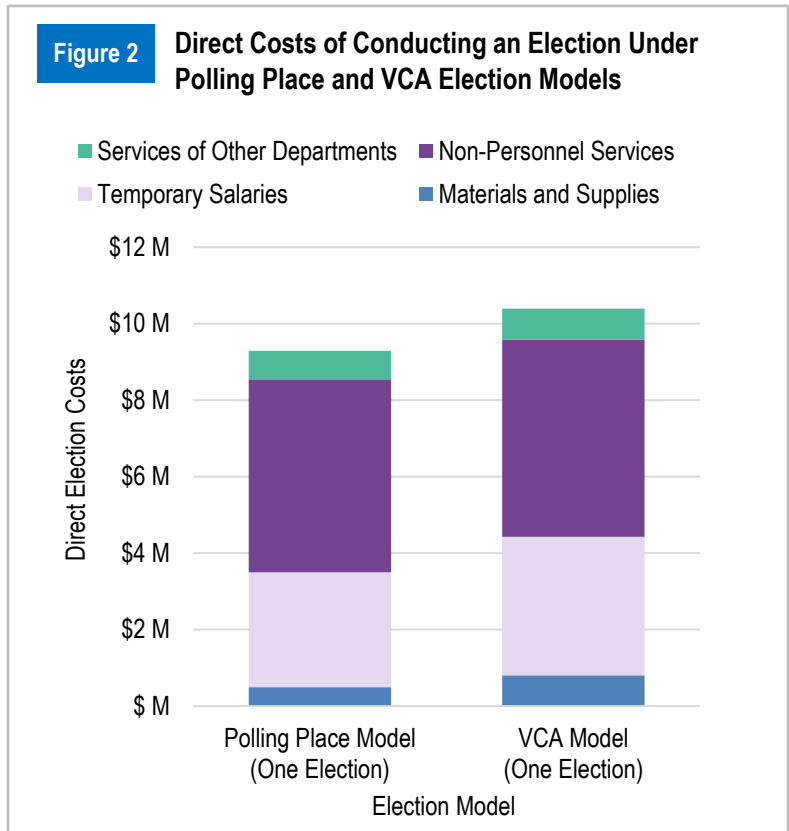
with translating the relevant sections of the Department's website, voter forms and applications, and outreach materials, and would assist liaising with community partners during the implementation process.

The Department recognizes that any successful implementation of the VCA elections model would require a major investment of senior management staff time throughout the entire transition process. The development of an Election Administration Plan (EAP) and the Voter Outreach and Education Plan (VEOP); the location of convenient and accessible vote center and ballot drop-off box sites; the revision of election procedures and security protocols; the drafting of new training manuals and official elections forms; and the hiring and training of vote center staff are all time-consuming processes that would require significant staffing resources. While salary costs are not included in the current estimate of implementation costs, the Department would likely incur additional overtime/compensatory time costs.



II. Ongoing Costs for Conducting Elections Under the VCA Model

As shown in Figure 2, the estimated direct costs for conducting a single election under the VCA model would be approximately \$10.4 million, with major expenses falling into four main categories: 1) Salary Costs of Temporary Employees hired to aid the full-time staff with various election tasks, including administration of registration and voting at vote centers, delivering equipment and supplies to vote centers, processing and counting of voted ballots, and various canvass processes; 2) Non-Personnel Services Costs associated with services required to facilitate voting for over half a million San Francisco registrants, including translation, transliteration, and review related to production of the official ballot in four languages and facsimile ballots in three additional languages; production and assembly of vote-by-mail packets; typesetting, translation, printing, and assembly of approximately 520,000 copies of the Voter Information Pamphlet and Sample Ballot, produced in four languages and several alternative formats (large print, audio, HTML and XML formats); 3) Materials and Supplies Costs associated with vote center supplies such threshold mats and ramps to achieve accessibility; power strips and adapters for voting equipment; voting booth parts; mandated tamper-evident security seals for voting equipment; ballot pens; “I Voted” stickers and vote center staff name badges; and 4) Costs of Services of Other Departments specific to elections, including costs for services from the Sheriff’s Department (for ballot security and collection services), the Department of Human Resources (for assisting with hiring of seasonal employees), the ReproMail (for mailing of election materials).



The “direct costs” shown above are limited to those that would not have occurred had the VCA election not taken place. Other costs – such as permanent staff salaries and contractual payments for ballot-processing equipment maintenance, software licensing for the Election Information Management system (the City’s voter registration database), and property rental costs – were omitted from calculations because they must be paid regardless of the election calendar. This means that, in a fiscal year with one election, where the Department’s base budget would be approximately \$24.4 million, the estimated direct costs for conducting one election under the VCA model would be \$10.4 million.

As noted above, this net direct cost estimate is approximately \$1.1 million higher than the direct cost realized for conducting an election under the current polling place model. While certain costs incurred under the polling place model would cease or decrease under the VCA elections model, others would emerge or increase. Among costs that would cease or decrease under the VCA elections model are those attributable to the printing of election rosters, stipends paid to poll workers, vehicle rental, and the production of paper ballots. However, those savings would be offset by new expenses, including those resulting from producing and mailing ballots to the 120,000 local voters not currently registered as permanent VBM voters, salaries of

temporary vote center employees and outreach material translators, vote center rental fees, vote center security costs, and costs associated with collecting voted ballots from vote centers and drop-off boxes.

2. Implementation Timeline

Per CAEC §4005, any county implementing the VCA elections model must do so in the context of a series of statutory deadlines, duly incorporating a number of target dates for VCA Election Administration Plan review, collaborative meetings with members of the public, voter outreach, staff training, public notice, and ballot mailing. To assist counties in implementing the VCA, the California Secretary of State (SOS) developed the 14 month [Sample Calendar for SB 450 Implementation](#), which includes a number of suggested deadlines for VCA related activities.

The City’s next regularly scheduled elections will be held in June 2022 and November 2022. The [SOS sample calendar](#) suggests commencing VCA implementation 425 days before the first election conducted under such election model. Keeping this start date in mind, transition to the VCA model for the June 2022 election would be feasible if the City made a decision in time to allow the Department to begin VCA implementation no later than April 2021. In order to transition to the VCA model for the November 2022 election, the Department would need to begin implementation no later than September of 2021. Below is a high-level schematic of these two transition schedules:

	CY 2021												CY 2022																		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec							
June 7, 2022 Election				Phase 1: Planning				Phase 2: Voter Education and Outreach																							
November 8, 2022 Election										Phase 1: Planning				Phase 2: Voter Education and Outreach																	

There are several advantages to adopting the VCA model in time for the June 2022 election rather than November 2022 election.

First, adopting the earlier timeframe would mitigate much of the voter confusion that would inevitably result from a series of changes to election procedures. Adopting the later timeframe would require voters to learn about their voting options under two different election models in a single year. Particularly in the context of a broad spectrum of COVID-19 related changes in 2020, ensuring process consistency as much as possible would likely increase voters’ understanding of their voting options under the VCA and encourage voter participation.

Second, adopting the earlier timeframe would allow time to conduct a robust uninterrupted outreach program to inform voters about VCA changes. Adopting the VCA for the June 2022 election would allow the Department to begin a VCA outreach program this year and to continue that outreach program through 2022 and beyond. In contrast, adopting the later timeframe would necessitate the development of two different voter outreach programs in 2022, with a delineated “pause” set between those programs in order to avoid disseminating contradictory messages. Given the fact that longer running voter education messaging tend to be more successful than shorter running messaging, such a dual outreach program method would likely be less successful in educating voters about their voting options.

Third, adopting the earlier timeframe would eliminate much of the planning necessary to adapt to any potential new election legislation. For example, if AB 37, intended to make universal ballot mailing permanent, did not pass this year, San Francisco voters might experience a confusing series of events: first, needing to request a vote-by-mail ballot in the March 2020 election,

then, due to passage of SB 860, automatically receiving a vote-by-mail ballot in the November 2020 election, then having to request a vote-by-mail ballot again for the June 2022 election, and finally, due to a local transition to the VCA, having a vote-by-mail ballot once again sent automatically in the November 2022 election.

Fourth, transitioning to the VCA for the June 2022 election would likely be more cost-effective than doing so for the November 2022 election, because coordinating plans for two different sets of in-person voting sites in a single year would likely require double staffing resources. Not only would Department staff need to work with the providers of the City's traditional polling place locations to secure them for the June 2022 election, but they would also need to work with the providers of the future vote center locations. Further exacerbating the difficulty of carrying out such dual voting site planning, the Department would be in the midst of redrawing its district and precinct lines following the 2020 federal census, thus complicating in-person voting site groundwork significantly.

I. Implementation Phases

Although complex on a granular level, VCA implementation can be conceptualized as having two main phases – planning and voter education. In the planning phase, the Department would focus on identifying and organizing an equitable array of local outreach partners, advocacy groups, and stakeholders who would be interested in providing feedback on the proposed locations of vote centers and ballot drop-off sites, voter education materials, and other VCA related activities.

In the planning phase, the Department would need to draft an Election Administration Plan (EAP) to detail how San Francisco would implement the VCA. In its EAP, the Department would be required to address 1) how voters with disabilities can obtain accessible ballots, 2) how the Department will address any voter inequities, 3) how the Department would safeguard vote center security, 4) how the VCA transition might yield cost savings, 5) the number, location, and hours for proposed vote centers and ballot drop-off locations, 6) voting contingency plans, 7) the estimated number and type of bilingual staff assigned to each vote center 8) all proposed accessible voting tools, including equipment, 9) proposed layouts of vote centers, and 10) the Voter Education and Outreach Plan.

Following completion of the initial EAP, the Department would need to present its internally developed document in a series of public meetings. As part of this public review and comment process, the Department would amend its EAP, incorporating public feedback as appropriate. The Department would be required to submit the final draft EAP to the SOS for review and final approval approximately five months before the first election conducted under the VCA elections model.

While certain elements of any VCA voter education and outreach program, such as a general announcement that all registered voters would automatically receive ballots by mail, could commence immediately following the decision to transition to the VCA elections model, a voter education phase, with specifics such as where vote centers and ballot drop-off sites would be located, could only begin following the approval of the Department's EAP by the SOS.

The focus of the voter education phase, which would need to begin approximately five months before the first election held under the VCA, would focus on changes to voting options from a voter's point of view, such as universal ballot mailing, the replacement of polling places with vote centers, and the range of services available at vote centers and ballot drop-off locations.

II. Implementation Calendars

The VCA implementation calendars below provide estimated dates for VCA implementation phases, based on June 2022 election and November 2022 election implementation targets, and are based on parallel estimates in the [SOS sample calendar](#).

June 7, 2022 Election Implementation Calendar

	Approximated Timeframe for Completion	Activity	E-day Start	Start Date	E-day End	End Date
Phase 1: Planning	1 Month: To be completed simultaneously with outreach to groups, advocates, stakeholders and officials.	Begin coordinated research effort with SOS support to identify and provide training to community groups, advocates, stakeholders, and officials that should participate in the public workshop process. (1 month development time)	-425	4/8/2021	-400	5/3/2021
	3 Months: To be completed prior to the public consultation period for the Election Administration Plan (EAP)	Begin outreach and provide training to community groups, advocates, stakeholders, and officials to ensure broad participation in a public consultation process (3 month training and outreach period). Also, the time period that is recommended for counties to develop, recruit, launch, and utilize input from a Language Accessibility Advisory Committee (LAAC) and Voter Accessibility Advisory Committee (VAAC).	-425	4/8/2021	-276	9/4/2021
	2 Months: To be completed simultaneously with outreach to community groups and prior to public consultations on EAP	Begin internal Election Administration Plan (EAP) development (2 month development window prior to public consultations)	-400	5/3/2021	-365	6/7/2021
	<i>Deadline</i>	Deadline for internal EAP development process. This ensures a proper working skeleton draft of an EAP that can be presented at public consultations with community groups.	-365	6/7/2021	-365	6/7/2021
	10 days prior to planned public consultations	Begin issuance of public notice for consultations on EAP	-276	9/4/2021	-276	9/4/2021
	<i>Deadline</i>	Deadline for outreach to community groups, advocates, stakeholders, and officials.	-276	9/4/2021	-276	9/4/2021
	3 weeks: Concentrated schedule of consultations on EAP to get feedback prior to issuing the draft EAP for public hearing	Begin public consultations period. At least one meeting with each language minority community and related organizations, as well as one for voters with disabilities and related organizations.	-276	9/4/2021	-200	11/19/2021
	3 weeks: Update EAP skeleton plan as you receive public input during the consultations period	End public consultations period.	-200	11/19/2021	-200	11/19/2021
	14 days: Public comment period prior to public hearing on draft EAP	Publish proposed draft Election Administration Plan (EAP). Begin 14-day public comment period on draft EAP.	-200	11/19/2021	-186	12/3/2021
	10 days	Issue 10-day public notice of hearing to consider draft EAP if using suggested plan development dates.	-196	11/23/2021	-186	12/3/2021
1 day (It is suggested you start here and work backwards and	Public hearing to consider draft EAP (three weeks to amend plan after hearing).	-186	12/3/2021	-186	12/3/2021	

	forwards from this date to generate your ideal calendar)					
	3 weeks	Date to publish amended EAP after hearing. Begin 14-day public comment period on published amended EAP.	-165	12/24/2021	-151	1/7/2022
	14 days: Public comment period for amended EAP	Date to adopt final amended plan and send outreach plan to SOS for approval.	-151	1/7/2022	-151	1/7/2022
Phase 2: Voter Education and Outreach	14 days: period for SOS staff to review submitted outreach plan	SOS deadline for approval of outreach plan if using suggested dates for EAP development.	-144	1/14/2022	-144	1/14/2022
	3 months: Materials to be developed for launch of the public outreach portion of the EAP	Develop voter outreach and education materials, PSA development, newspaper announcements and media plans, and other documents or materials for activities in approved outreach plan (3 months of materials development). Coordinate with SOS regarding available materials from SOS office	-143	1/15/2022	-53	4/15/2022
	6 months: Execution of all of the activities included in the public outreach plan	Begin voter outreach and education activities. Activities include items detailed in the SOS approved outreach plan including social media engagement, traditional media for English and other required language communities, required PSAs, and other public education activities	-143	1/15/2022	0	6/7/2022
	3 month hiring and training window for new SB450 related staff	Beginning of period to recruit and hire needed temporary vote center staff.	-123	2/4/2022	-39	4/29/2022
	<i>Deadline</i>	Deadline for amendments to an election administration plan in case of emergency.	-120	2/7/2022	-120	2/7/2022
	<i>Deadline</i>	Last possible day for public comment if EAP was amended on the last day allowed by law.	-90	3/9/2022	-90	3/9/2022
	First of two direct contact with voters regarding new election administration should probably not be earlier than 3 months out	First direct contact with voters regarding the change in election administration.	-90	3/9/2022	-90	3/9/2022
	<i>Deadline</i>	Determination of the number of registered voters in the county in order to determine the number of vote centers and drop boxes required.	-88	3/11/2022	-88	3/11/2022
	Second of two direct contacts with voters about new election administration should probably not be earlier than 2 months out from election	Second direct contact with voters regarding the change in election administration. Also, publish the list of vote center and ballot drop of locations and hours.	-60	4/8/2022	-60	4/8/2022

1 month: Period to complete all required accessibility and language community public education meetings. One meeting with general public education is also highly recommended	Begin completing required language and disability workshops. One bilingual workshop for each language community served and one to increase access and participation for voters with disabilities. It may also be useful to host one or more general information workshops for the general public regarding the changes in voting administration. Consider using connections with community organizations to provide widespread outreach to community.	-50	4/18/2022	-32	5/6/2022
<i>Deadline</i>	Deadline to finalize hiring of any temporary vote center staff.	-39	4/29/2022	-39	4/29/2022
<i>Deadline</i>	End public workshops period.	-32	5/6/2022	-32	5/6/2022
1 month: Train and coordinate staff activities for new vote centers	Period to begin training for vote center staff.	-35	5/3/2022	-11	5/27/2022
1 month	Vote by mail ballot packets must be mailed to each voter starting on this date. Toll-free voter assistance hotlines must be operational.	-29	5/9/2022	-29	5/9/2022
1 month	Ballot drop-off locations required to be open during regular business hours. One must be available at least 12 hours per day.	-29	5/9/2022	-29	5/9/2022
1 month	Ballot drop-off location management activities begin.	-29	5/9/2022	-29	5/9/2022
10 days	Vote Centers (1 per 50k) must be open for at least 8 hours per day	-10	5/28/2022	0	6/7/2022
7 days	VBM Language and Accessibility ballot request deadline.	-7	5/31/2022	0	6/7/2022
3 days	Vote centers (1 per 10k) must open for at least 8 hours per day.	-3	6/4/2022	0	6/7/2022

November 8, 2022 Election Implementation Calendar

	Approximated Timeframe for Completion	Activity	E-day Start	Start Date	E-day End	End Date
Phase 1: Planning	1 Month: To be completed simultaneously with outreach to groups, advocates, stakeholders and officials.	Begin coordinated research effort with SOS support to identify and provide training to community groups, advocates, stakeholders, and officials that should participate in the public workshop process. (1 month development time)	-425	9/9/2021	-400	10/4/2021
	3 Months: To be completed prior to the public consultation period for the Election Administration Plan (EAP)	Begin outreach and provide training to community groups, advocates, stakeholders, and officials to ensure broad participation in a public consultation process (3 month training and outreach period). Also, the time period that is recommended for counties to develop, recruit,	-425	9/9/2021	-276	2/5/2022

	launch, and utilize input from a Language Accessibility Advisory Committee (LAAC) and Voter Accessibility Advisory Committee (VAAC).					
	2 Months: To be completed simultaneously with outreach to community groups and prior to public consultations on EAP	Begin internal Election Administration Plan (EAP) development (2 month development window prior to public consultations)	-400	10/4/2021	-365	11/8/2021
	<i>Deadline</i>	Deadline for internal EAP development process. This ensures a proper working skeleton draft of an EAP that can be presented at public consultations with community groups.	-365	11/8/2021	-365	11/8/2021
	10 days prior to planned public consultations	Begin issuance of public notice for consultations on EAP	-276	2/5/2022	-276	2/5/2022
	<i>Deadline</i>	Deadline for outreach to community groups, advocates, stakeholders, and officials.	-276	2/5/2022	-276	2/5/2022
	3 weeks: Concentrated schedule of consultations on EAP to get feedback prior to issuing the draft EAP for public hearing	Begin public consultations period. At least one meeting with each language minority community and related organizations, as well as one for voters with disabilities and related organizations.	-276	2/5/2022	-200	4/22/2022
	3 weeks: Update EAP skeleton plan as you receive public input during the consultations period	End public consultations period.	-200	4/22/2022	-200	4/22/2022
	14 days: Public comment period prior to public hearing on draft EAP	Publish proposed draft Election Administration Plan (EAP). Begin 14-day public comment period on draft EAP.	-200	4/22/2022	-186	5/6/2022
	10 days	Issue 10-day public notice of hearing to consider draft EAP if using suggested plan development dates.	-196	4/26/2022	-186	5/6/2022
	1 day (It is suggested you start here and work backwards and forwards from this date to generate your ideal calendar)	Public hearing to consider draft EAP (three weeks to amend plan after hearing).	-186	5/6/2022	-186	5/6/2022
	3 weeks	Date to publish amended EAP after hearing. Begin 14-day public comment period on published amended EAP.	-165	5/27/2022	-151	6/10/2022
	14 days: Public comment period for amended EAP	Date to adopt final amended plan and send outreach plan to SOS for approval.	-151	6/10/2022	-151	6/10/2022
Phase 2: Voter	14 days: period for SOS staff to review submitted outreach plan	SOS deadline for approval of outreach plan if using suggested dates for EAP development.	-144	6/17/2022	-144	6/17/2022
	3 months: Materials to be developed for launch of the public outreach portion of the EAP	Develop voter outreach and education materials, PSA development, newspaper announcements and media plans, and other documents or materials for activities in approved outreach plan	-143	6/18/2022	-53	9/16/2022

	(3 months of materials development). Coordinate with SOS regarding available materials from SOS office				
6 months: Execution of all of the activities included in the public outreach plan	Begin voter outreach and education activities. Activities include items detailed in the SOS approved outreach plan including social media engagement, traditional media for English and other required language communities, required PSAs, and other public education activities	-143	6/18/2022	0	11/8/2022
3 month hiring and training window for new SB450 related staff	Beginning of period to recruit and hire needed temporary vote center staff.	-123	7/8/2022	-39	9/30/2022
<i>Deadline</i>	Deadline for amendments to an election administration plan in case of emergency.	-120	7/11/2022	-120	7/11/2022
<i>Deadline</i>	Last possible day for public comment if EAP was amended on the last day allowed by law.	-90	8/10/2022	-90	8/10/2022
First of two direct contact with voters regarding new election administration should probably not be earlier than 3 months out	First direct contact with voters regarding the change in election administration.	-90	8/10/2022	-90	8/10/2022
<i>Deadline</i>	Determination of the number of registered voters in the county in order to determine the number of vote centers and drop boxes required.	-88	8/12/2022	-88	8/12/2022
Second of two direct contacts with voters about new election administration should probably not be earlier than 2 months out from election	Second direct contact with voters regarding the change in election administration. Also, publish the list of vote center and ballot drop of locations and hours.	-60	9/9/2022	-60	9/9/2022
1 month: Period to complete all required accessibility and language community public education meetings. One meeting with general public education is also highly recommended	Begin completing required language and disability workshops. One bilingual workshop for each language community served and one to increase access and participation for voters with disabilities. It may also be useful to host one or more general information workshops for the general public regarding the changes in voting administration. Consider using connections with community organizations to provide widespread outreach to community.	-50	9/19/2022	-32	10/7/2022
<i>Deadline</i>	Deadline to finalize hiring of any temporary vote center staff.	-39	9/30/2022	-39	9/30/2022
<i>Deadline</i>	End public workshops period.	-32	10/7/2022	-32	10/7/2022
1 month: Train and coordinate staff activities for new vote centers	Period to begin training for vote center staff.	-35	10/4/2022	-11	10/28/2022

1 month	Vote by mail ballot packets must be mailed to each voter starting on this date. Toll-free voter assistance hotlines must be operational.	-29	10/10/2022	-29	10/10/2022
1 month	Ballot drop-off locations required to be open during regular business hours. One must be available at least 12 hours per day.	-29	10/10/2022	-29	10/10/2022
1 month	Ballot drop-off location management activities begin.	-29	10/10/2022	-29	10/10/2022
10 days	Vote Centers (1 per 50k) must be open for at least 8 hours per day	-10	10/29/2022	0	11/8/2022
7 days	VBM Language and Accessibility ballot request deadline.	-7	11/1/2022	0	11/8/2022
3 days	Vote centers (1 per 10k) must open for at least 8 hours per day.	-3	11/5/2022	0	11/8/2022