









### **OVERVIEW**

POLLING PLACE

For the remaining 2020 elections, both primaries and in November, jurisdictions will still offer inperson voting, whether at Election Day polling places, or during early in-person voting at sites or the election offices. In the COVID-19 environment, election officials should understand potential election management considerations associated with health and safety at voting locations. Regardless of the size of a jurisdiction's in-person operation, methods should be developed to protect the health and safety of poll workers and voters.

Decisions affecting upcoming elections should be made as soon as possible to facilitate a safe election and minimize the operational risks associated with changing processes and procedures at a late date.

Much of the guidance in this document is based upon the Joint Working Group's review of current information and guidance available from <u>The Centers for Disease Control and</u> <u>Prevention (CDC)</u>. The CDC has a "<u>Hierarchy of Controls</u>" for managing workplace safety and occupational hazards. Using that as a model, ways to make the workplace safer include the use of:

- Engineering measures to isolate people from the hazard (e.g., spreading check-in stations and voting booths to support social distancing of workers and voters).
- Administrative measures to change the way people work (e.g., creating a policy of not passing ballots or ID cards back and forth and instead placing them in a neutral area).
- Personal protective equipment (PPE) (e.g., gloves and N-95 masks) and additional items (e.g., other masks or face coverings) to protect workers and others.

The guidance in this document includes engineering and administrative suggestions that can help minimize or mitigate poll worker exposure to COVID-19.

### **PROTECTING POLL WORKERS AND VOTERS**

Protecting poll workers will help facilitate safe and effective election administration. To successfully recruit poll workers and keep them healthy, it may be important to provide some base level of protection for them, consistent with the conditions and public health official guidance at the time.

# WHAT CAN YOU AS AN ELECTION OFFICIAL DO TO PROTECT YOUR WORKERS AND VOTERS IN POLLING PLACES?

There are a number of areas to consider when working to make elections safe for your workers and voters, including:

- Promoting certain behavioral norms, such as cleaning, disinfection, hand hygiene and social distancing.
- Selecting, designing, and operating polling places consistent with safety precautions and public health official guidance.
- Reengineering poll worker training.
- Reengineering the return of supplies at the close of Election Day and final cleaning and disenfection of locations to return them to prior use.
- Providing supplies for cleaning, disinfection, hand hygiene, and protection.

## WHAT PPE AND SUPPLIES FOR CLEANING AND DISINFECTION CAN YOU REASONABLY PROVIDE TO POLL WORKERS?

Protective materials and supplies for cleaning and disinfection offer some level of protection to poll workers and give confidence their health and safety is a top priority. In the 2020 primary season, election officials have successfully deployed some or all of the following items to poll workers:

- Hand sanitizer or hand washing stations.
- Disinfecting wipes and spray.
- Gloves.
- Masks and other face coverings.
- Other protective clothing.

Gloves can be helpful for workers interacting with voters if used properly and consistent with public health guidance. If gloved poll workers touch a contaminated surface and then touch their face, they could still be exposed to the virus. However, gloves may provide confidence to workers and are widely used when provided.

As of this writing, with limited exceptions, the CDC\_recommends people wear "cloth face coverings in public settings where other social distancing measures are difficult to maintain" to contain their own droplets in case they are carrying or shedding the virus. The CDC advises "cloth face coverings fashioned from household items or made at home from common materials at low cost can be used as an additional, voluntary public health measure." Face coverings may also present an opportunity for local election officials to brand the election, using slogans such as "Protect the Poll Workers" or "#DemocracyBeatsCovid."

During the Wisconsin primary election on April 7, 2020, a drive-in voting location was staffed by teams wearing additional protective equipment, including N-95 masks, eye protection and isoloation gowns. Such equipment could be helpful for election staff when serving voters believed to be carrying COVID-19. Videos and written guidance on how to properly put on and take off PPE are provided on the CDC website. Having a small supply of this equipment may prove valuable for such limited instances.

In light of supply chain considerations, try to procure this equipment as soon as possible.

#### CAN ANY OF THE PPE BE MADE AVAILABLE TO VOTERS?

It is unlikely election officials will be able to provide full PPE to all voters. However, you may be able to offer voters some supplies in some quantity:

- Handwashing stations and/or hand sanitizer.
- Gloves and masks, while likely more difficult to acquire in quantities to supply all voters, may be available for certain circumstances.

#### HOW CAN YOU REGULARLY CLEAN AND DISINFECT THE POLLING PLACE?

It is important to provide poll workers with supplies to regularly clean and disinfect the polling place. Traditional cleaning supplies such as bleach spray or similar products can be effective in killing COVID-19, though these items have been in high demand, and supply chain problems may persist through the election in November. Consult this list of Environment Protection Agency (EPA) approved disinfectants that are effective against COVID-19. Consult your voting equipment vendor before approving any cleaning solution for use on voting equipment, electronic poll books or other polling place technologies.

Using approved methods, poll workers should clean equipment in full view of voters so they can see that it is being done. Specific recommendations include:

- Check with your vendor on approved cleaning products and procedures for voting devices. Many standard disinfectant products may harm the devices.
- Place orders for cleaning products as early as possible through the normal procurement process for your jurisdiction. If supplies cannot be secured through traditional acquisition processes, make official requests through emergency management officials at the local and state level.
- Look for alternative providers. Supplies you can usually acquire may be forfeited to other critical functions such as healthcare systems, public safety and jails.
- Election officials have found products outside their normal or preferred purchasing channels, including from local distilleries for hand sanitizer. It will be important to determine the regulations or emergency purchasing powers of the office.
  - Interactive map from the Distilled Spirits Council of the United States.
  - List from the American Craft Spirits Association.
- Some election officials can offer portable hand washing stations to voting locations.

## HOW CAN YOU ESTABLISH APPROPRIATE NORMS FOR POLL WORKER AND VOTER BEHAVIOR TO INCREASE SAFETY?

At the time of this writing, CDC guidance recommends social distancing to keep people at least 6 feet apart. This can be challenging when administering polling places.

Providing well-designed signage in the polling place to establish broadly understood norms will be valuable. Large posters with clear, declarative statements should be visible to all

stakeholders directing them to follow instructions. Signs should also include infographics depicting the expected behavior. Consider providing directions in multiple languages, consistent with ballot language options. The point is to ensure your workers and customers understand what is expected. The <u>Center for Civic Design</u> is a potential partner to assist with developing plain language guidance. An example of such a poster could include the following language:

- Poll Workers Must
  - Stay 6 feet away from other poll workers and voters.
  - Wear a face covering.
  - Wash or sanitize their hands frequently.
  - Disinfect items such as pens and pollbooks regularly.
  - Disinfect voting booths regularly.
- Voters Should
  - Remain 6 feet away from other voters and poll workers.
  - Wear a face covering, if they have one.
  - Use personal or provided alcohol-based hand sanitizer after transactions with poll workers or any voting device, but not before or at any point while in possession of an optical scan ballot. Sanitizer can damage paper ballots and render them unreadable.

#### HOW SHOULD YOU MODIFY THE POLL WORKER TRAINING ENVIRONMENT?

Training poll workers in a COVID-19 environment may present unique challenges. For many jurisdictions, training is generally designed and executed in a classroom and includes hands-on experience with voting equipment. With the potential for use of many first-time poll workers, it will be particularly important to provide high-quality training.

Try offering as many virtual training opportunities as possible:

- This can be a live or recorded video lecture that simulates the up-close opportunities voters get when equipment is provided. For example, for the April 7, 2020, Wisconsin primary election, state election officials built an entire library of virtualized training opportunities:(https://elections.wi.gov/COVID-19/training-for-poll-workers).
- Invest in available online training technology to simulate using the equipment. Election
  officials have used this type of technology to allow poll workers to simulate physical
  movements by using the mouse in a drag-and-drop manner to locate seals on voting
  machines or to simulate pushing access buttons in the sequence necessary to operate the
  machines properly.

If you must conduct in-person training sessions, make the class size as small as possible and enforce social distancing:

- Inform trainees of the sanitation requirements and whether they are responsible for supplying their own protective gloves, masks and other PPE.
- Consider holding training in a location that allows poll workers to have hands-on practice with the equipment one person at a time. It may also be possible to have small groups in a facility where the pieces of equipment can be 6 feet apart with one person per piece of equipment. Having hands-on training can be especially important when using new technology.

### **OPENING THE POLLING PLACE AND RETURNING MATERIALS**

Cleaning and disinfecting the polling place prior to opening the doors, including wiping down doorknobs and push plates, will help establish appropriate norms among poll workers.

The CDC recently <u>published guidance</u> for managing essential workers who have been exposed to COVID-19, along with a simplified <u>list of do's and don'ts</u>. Subject to applicable employment laws and regulations, election officials should consider establishing protocols for taking the temperature of poll workers before opening to ensure they remain healthy. Consider how you should modify procedures for closing polls and returning materials to safeguard the poll workers, election staff, and materials.

The safety of poll workers and election staff is important throughout the election process, including when collecting materials from poll workers at the close of voting and when poll workers return materials to regional or central locations.

Material collection operations include collection of results media, ballots, provisional ballots, and other necessary election materials. This can be a lengthy process. It may involve asking two poll workers to travel together, which can introduce additional risk to them personally. Poll workers may be required to work together to bring materials into a staffed building, potentially introducing another set of interactions with others.

Trying to limit potential worker health and safety risks is important. Consider new procedures for the acceptance of voting materials at the end of the voting day to limit person-to-person contact to the extent possible. Review the CDC's "<u>Hierarchy of Controls</u>" and the approach of reengineering processes or administrative practices to isolate individuals from one another to limit exposure. Make decisions as soon as possible to ensure time for proper training and implementation.

Drive-through collection operations may be a prudent option. They allow poll workers to avoid exiting their cars and congregating in a receiving operation. In some places, this change will take considerable reengineering of process and space. If such a change is not viable at your elections office, you may need to secure a remote location and/or multiple regional locations. Additional considerations for such reengineering include:

- Vehicle lines may require more space than may be available in existing parking lots. If lines extend out of the parking lot and into the street, they may slow normal traffic patterns. Work with local planning authorities and law enforcement to set up a viable, safe plan.
- Moving check-in operations outdoors may bring weather, electrical and connectivity challenges.
- Possible sites might include parking lots or parking garages at locations such as malls, schools, convention centers or sport venues.
- Election officials may accept materials from poll workers through car windows or take them directly from the trunk. Create a plan that ensures and maintains the proper chain of custody for any exchange of election materials, as required by law.
- Materials necessary to provide election results, such as transfer bags and their contents including SD Cards or USB cartridges, should be cleaned before transfer and use for tabulation.
- It is important to validate this procedure with vendors to prevent damage to these critical items.

 Other materials not immediately needed for use can be stored for a period of time to reduce risk and permit cleaning under less pressing time constraints. Changing these receiving protocols involves implementing a new process for the acceptance, transfer, and storage of materials such as ballots and affidavits, which are critical for canvases, audits, and recounts. Consequently, care should be exercised to ensure chain of custody is maintained.

If you use the traditional models of requiring poll workers to park and enter a building, follow the same suggestions for redesigning a polling place described above. Key elements are:

- Social distancing of poll workers and materials receiving team.
- Cleaning and PPE.
- Consider modifications to the chain of custody procedures to allow poll workers to travel separately, but in tandem, in their own vehicles. Pairs of returning poll workers could divide the materials between them so no single source has custody of all the materials. For example, ballots, a copy of the results tape, and a record of seals could travel in one vehicle and results data media, a record of seals, and the results tape in another.
- In lieu of a drive-through approach, it may be possible to create outdoor drop-off in some places and limit the indoor congestion.

Note such modifications may increase the time to return material and supplies, thus increasing the time to update election results. It also may invite legal or political concerns about the integrity of the process. Communication regarding process changes to political parties, campaigns, and other stakeholders will be vital.

# HOW DO YOU ADDRESS CONTRACTING AND OTHER FINANCIAL CONSIDERATIONS BASED ON EXPECTED CHANGES?

Acquiring high demand or high price supplies may create procurement challenges. Procurement can also be a time-consuming process that may make timely receipt of goods untenable. Consider working with your purchasing department to determine whether your organization participates in a cooperative purchasing alliance or whether you can take advantage of a <u>cooperative contract</u>. An option might also be the <u>GSA Cooperative Purchasing Program</u>. Check whether your vendor is an approved industry partner in this program.

Increased election worker pay or rental agreement changes can also pose challenges. Hold meetings now with your elections office partners—procurement, finance, legal—that can help you modify budget line items quickly. Move quickly to define the new or changed specifications, such as new or additional materials needed to manage lines, social distancing, and poll worker isolation devices. Working through this document should guide you on the path to identifying these gaps.

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

Check with the U.S. Election Assistance Commission (EAC) to verify whether Help America Vote Act (HAVA) funds, including The Coronavirus Aid, Relief, and Economic Security Act (CARES Act) funds, can be used to cover these additional costs.

#### **DESIGN VOTING LOCATIONS FOR DISTANCING**

In addition to social distancing, the layout and operation of your voting location can help isolate workers from the hazards of COVID-19. Each location will have its own variations, but consider these principles as you reconfigure the polling place operation to support poll worker and voter safety.

Some general layout guidance includes:

- Set up voter check-in tables to create 6-foot distancing between poll workers.
- Physical barriers like plexiglass shields can also be used between workers and voters and between voting stations.
- Provide guidance and templates showing the poll workers exactly where to set up voting machines and voting booths, making sure they are at least 6 feet apart.
  - Note this kind of layout has a high potential to reduce the amount of voting equipment that can fit into any given location and could result in longer wait times. Voter education and outreach should highlight this fact.
- Provide guidance for line management. Election officials and others managing lines have taken to marking the ground in 6-foot increments. This puts the election officials in charge of setting the expected behavior and allows them to better enforce the practice.
  - Note that lines may extend outside the polling location, which presents additional factors for consideration. Voters waiting outdoors would benefit from outdoor air circulation. Outdoor lines may also impact how poll workers are able to monitor or control electioneering behavior (i.e., campaigning near polling locations). Potential inclement weather is also a factor in many parts of the country.
- Place guidance on the floor using arrows from painters tape to guide voters through the polling place, from the entrance to the line, to the check-in stations, to the voting area, to the ballot receiving scanner or box, and finally to the exit.

The 6-foot requirement will increase the look of the length of the line drastically. It can result in perhaps one quarter of the voters being able to line up in the same amount of space if they are being snaked around inside a polling place. If they are lining up in a straight line, you should plan to fit fewer than half of the voters in the same amount of space. What does this new math do to a location's viability?

- When assessing locations, determine whether there will be enough room to snake voters around inside the building, or whether the 6-foot spacing will require extending a line of voters outside.
- Have a line management plan drawn up ahead of time and include it in poll worker training.
  - Provide adequate supplies (e.g., painter's tape, chalk, etc.) for poll workers to indicate where voters should stand.

 Consider using visual simulation models, such as the <u>University of Rhode Island's (URI)</u> <u>Votes Tools</u>, to lay out voting locations and design line strategies that help enforce appropriate social distancing.

Checking in voters will involve significant person-to-person interaction. This likely involves passing identification, documentation, and voting necessities between poll workers and voters. This may also include sharing tablets used for electronic poll books, which may not be compatible for use with gloves. To mitigate some of the hazards of personal contact consider:

- Having poll workers examine documents by eye without physically taking them from the voters where possible. For example, a seethrough barrier could be placed between voter and poll worker. Alternatively, without a barrier, the voter could put the documentation down on the table and step back while the poll worker examines the documents without touching them..
- Tasks that must be performed by bipartisan teams, in jurisdictions where this is required, could be done in series not in parallel, if consistent with applicable law and policy. One party member reviews first; then the next party member reviews.
- Create a "neutral zone" for passing materials.
  - Have poll workers place documents needing to be signed by the voters, such as pollbook or provisional ballot applications, in a neutral space from which they can back away as the voter approaches, and vice versa.
  - Use the same neutral space for delivering ballots, pens, and activation cards to voters to maintain appropriate space.

New and innovative products are coming to market to help physically isolate individuals from the virus, such as plexiglass shields to protect the check-in table. Such solutions come with design, procurement, and production challenges of their own, although some officials have built their own.

# WHAT ARE THE BEST PROTOCOLS FOR ITEMS THAT MUST BE HANDLED BY MULTIPLE PEOPLE?

Voting equipment, voting booths, electronic poll books, marking devices (i.e., pens, pencils) all must be touched by many voters and poll workers. Appropriate cleaning protocols should be followed. Work with your vendors to determine how to appropriately disinfect these devices. Identify a first and second option in case there are supply issues. Check in regularly with your vendors as they work with component suppliers and new information is made available from the EPA and CDC.

Consider how to regularly clean the following devices:

- Touchscreen voting machines, including adaptive equipment.
- Other Direct Recording Electronic devices, including adaptive equipment.
- Printers that deliver the ballot to the voter, either internal or external to the voting equipment.
- Electronic poll books, laptops and tablets.
- Hardware used to key in the code that writes data to a card which may be used to activate a voter's specific ballot.

- Paper ballot scanners. While often not touched by voters, scanners are regularly touched by poll workers to resolve issues as well as open and close the polls.
- Devices used to capture and transmit machine- or precinct-level results, if not embedded into voting equipment. This can include a laptop or a purpose-built machine.
- Ballot booth surfaces.
- Pens and pencils.

Consider alternatives that could reduce or eliminate cleaning between uses by voters:

- Provide a new pen for each voter which are approved for use with precinct count optical scanners. Many vendors require quick drying ink to prevent damage to the scanners.
- Some ideas require more discussion and approval from equipment vendors such as:
  - Provide pencils with an eraser to use as a stylus for the voter to interact with the touch screen.
  - Provide single use Q-Tips to work as a stylus.
  - Place and regularly change plastic wrap over the touch screen devices (e.g., ballot marking system, electronic pollbook, etc.).

### **GUIDANCE AND EXPECTATIONS FOR VOTERS**

Setting realistic expectations for voters is important. Communicate clearly with voters about what they can expect and what is expected of them to keep everyone as safe as possible.

Consider what you might tell voters to expect in the polling place:

- Wait times are likely to be longer because of social distancing.
  - Publicize this before the election. Let people know in advance what to expect and recommend voting during traditionally lower demand times, like mid-morning and mid-afternoon, or lower traffic early voting days.
- Lines will *look* longer as a result of social distancing.
- Spaces for lining up may be marked with tape inside and chalk outside.
- Signs will list what voters can expect from poll workers as well as the expectations of voters in the polling place as listed above.

If you have significant new procedures in place, alert voters in advance before they enter the polling place. Use signage and messaging to help voters understand they can help distance themselves from poll workers by following the new procedures. Your signage might include information such as:

- Voters may show voter verification documents to poll workers without handing directly to them.
- There will be a neutral space on the check-in table where materials such as IDs, ballots, or documents that need to be signed will be placed.
- Please use the neutral space so social distancing can be maintained with the poll workers.

### **NEW OR GREATER CYBER AND PHYSICAL RISKS**

- Increased use of online training contributes additional cyber risks such as insecure coding and SQL injections.
- Changes to the physical operations for accepting electronic media used for transferring voting results from the voting machines to the election tally system should be fully vetted.
- Frequent messaging and communication with poll workers and voters requires websites, emails, and social media accounts to be secure and trustworthy—now more than ever.
- Changes to voting locations and materials receiving stations can result in operational, cyber, connectivity, and physical security challenges.

### **CONTROLS FOR MANAGING RISK**

- Run vulnerability scans and conduct remote penetration testing on your publicly facing websites, such as new online training sites.
- Invite your regional Cybersecurity and Infrastructure Security Agency (CISA) Physical Security Advisor (PSA) for an Assist Visit.
- Work with your PSA after the visit to fill out the Infrastructure Survey Tool (IST) to identify and document the overall security and resilience of the facility.
- Access the services described above in the <u>CISA Election Infrastructure Security Resource</u> <u>Guide</u>. All services can be requested at <u>EISSA@cisa.dhs.gov</u>. All these services are available at no cost to election officials.
- Use a .gov top-level domain for your official website.
- To gain situational awareness of the threats to the election infrastructure, become an El-ISAC Member by visiting <u>https://www.cisecurity.org/ei-isac/</u>.

## RESOURCES

#### Centers for Disease Control and Prevention (CDC)

- **CDC Situation Summary webpage**—This page provides updated information and guidance on the novel coronavirus and COVID-19.
- **CDC Coronavirus index webpage**—This page provides links to all CDC resources on the novel coronavirus and COVID-19.
- CDC List of State and Territorial Health Department Websites—This page provides links to all websites of state and territory health departments, which the CDC recommends consulting for state-specific information on the novel coronavirus and COVID-19.
- CDC Recommended Precautions for Preventing Spread of COVID-19 in Election Polling Locations, including Cleaning and Disinfection—This guidance provides recommendations on the routine cleaning and disinfection of polling location areas and associated electronic equipment. It suggests actions that poll workers can take to reduce the risk of exposure to COVID-19 by limiting the survival of the virus in the environment.

According to the CDC, this guidance will be updated if additional information becomes available.

- There is a section on recommendations for processing mail-in ballots. The CDC states workers handling mail-in ballots should practice hand hygiene frequently and no additional precautions are recommended for storage of ballots.
- CDC Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19), February 2020—This interim guidance for businesses may be relevant to election offices. It seeks to help prevent workplace exposures to acute respiratory illnesses, including COVID-19, in non-healthcare settings. The guidance also provides planning considerations if there are more widespread, community outbreaks of COVID-19.

#### Cybersecurity and Infrastructure Security Agency (CISA)

- <u>CISA Coronavirus webpage</u>—This page provides information on CISA's efforts with federal partners concerning coronavirus and COVID-19 and links to other federal resources.
- CISA Insights: Risk Management for Novel Coronavirus (COVID-19)—This brief provides recommendations on how to address physical supply chain and cyber security issues that may arise from the spread of the novel coronavirus. This resource is helpful for election officials to prepare for possible impacts of the novel coronavirus.

#### Election Assistance Commission (EAC)

- Vendor Manufacturer Guidance on Cleaning Voting Machines and Other Election <u>Technology</u>—This resource was created to track vendor specific guidance.
- EAC Disaster Preparedness and Recovery webpage—This page features presentations from election administrators about how they conducted elections in the face of a variety of natural disasters. Their examples of preparedness and recovery could be helpful for election officials as they address the novel coronavirus and
- COVID-19.
- EAC Contingency Plans webpage—In preparation for the 2016 elections, the EAC collected continuity of operations plans (COOPs) and resources from election officials at the state and local levels. This includes state-specific examples for H1N1 flu preparedness.
- EAC Election Management Guidelines Chapter 11: Contingency Planning and Change Management—This 2009 resource was created to assist state and local election officials in effectively managing and administering elections. Each chapter explores a different aspect of election administration and provides examples and recommendations.

This document was finalized on May 28, 2020. The situation and resultant guidance are subject to change. For current public health guidance relating to COVID-19, see <u>coronavirus.gov</u>. Election officials should also consult their state and local laws, including any applicable executive orders, regarding social distancing and other required or recommended public health practices (such as the wearing of masks by non-medical personnel).