

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

Managing an Increase in Outbound Ballots

Overview

Mailing a greater volume of ballots takes considerable planning. This document seeks to help election officials who are faced with scaling up, no matter what their current baseline is for mailing ballots. The following questions and answers focus primarily on partnerships with your procurement office, designers, envelope and mail ballot print vendors, the US Postal Service (USPS), and mail fulfillment centers. Other resources available to election officials as they navigate this set of changes are provided in the last section.

General Considerations

Now that you know you need more capacity; how do you figure out exactly what you need?

Determining your new support requirements for increased voting by mail is essential. To do this effectively, you need to:

- Understand all relevant dates and deadlines by working with vendors and USPS. Highlight whether any of your dates have/will change owing to “emergency procedures.”
- Make best guesses of your expected mail volumes and the timelines you need to complete the task. These estimates will dictate the space you need for workflow of people, process, and equipment (i.e., with high volume and less time, you need more space for more people to process faster). This document should help you determine the critical information you will need to gather to make these estimates.
 - The critical decision would be whether to outsource the packaging of mail ballot envelopes or keep it internal.

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

Work with your Purchasing Department to determine whether your state participates in a cooperative purchasing alliance, or you can take advantage of a [cooperative contract](#). A similar option would be the [GSA Cooperative Purchasing Program](#). Check whether your vendor is an approved industry partner in this program.

- Detail all current vote by mail contracts in a single place, listing the existing terms.
- Hold meetings now with your state and local government partners—procurement, finance, legal—that can help you modify existing contracts and help you negotiate new contracts quickly.
- Move quickly to define the new or changed specifications, such as new ballot storage racks or increased envelopes counts. Working through this document should guide you on the path to identifying these gaps.
- Within the confines of your procurement requirements, begin working with your vendors as soon as possible.

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

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

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

How can USPS help you?

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

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

- Get assistance with envelope design and approval.
- Meet about postage rates and strategy because there are major cost savings available if you can use non-profit status (depending on your mailing deadlines).
- Discuss time frames for running voter addresses through CASS certification and NCOA.

- Discuss use of Intelligent Mail Barcodes (IMB). See the *Other Resources* and sections below for more details.
- Discuss process for sharing and fixing problems with delivery and receipt.
- If you use a mailing vendor, confirm your envelope design with them to make sure it works with their mail packet insertion process. Your mail piece will still need to be compliant with USPS standards, but small adjustments can make a big difference in processing efficiencies—less waste from damaged envelopes, etc.
- Try to include ballot-specific Service Type Identifier (STID), a unique three-digit code that indicates the service type for an individual mailpiece, in the mail barcode.
- For election mail, always use green 191 tray tags for your mail trays.
- See *Other Resources* below for specifics.

If you are changing or adding an additional mail ballot printer, what standards should you use to vet potential vendors?

Some states have very little experience with preprinted optical scan ballots or with large vote by mail operations. A move to a new vendor may be required for increasing vote by mail. Consider the following when making your choice:

- Do your potential vendors have experience printing ballots, and if so, is that experience with clients using your voting system?
- Can they produce ballots that meet paper specifications and requirements set by voting system vendors (i.e., print tolerances and quality, paper weight, opacity, etc.)?
- Can they produce needed envelopes for your election in the required time frame?
- Can test decks be preprinted by their production equipment and can the decks be read by your voting system?
- Do they have the capacity to print pre-marked and blank ballots for logic and accuracy testing?
- Will they assign a point of contact to your jurisdiction? (Consider requiring that they do)?
- Can they produce and deliver within statutory deadlines?

Why should you outsource the packaging of already printed ballots to a fulfillment center?

In jurisdictions with significant voter counts, lots of ballot styles, and/or more volume than they have managed before, vendor support on outbound mailing will be valuable. Some ballot printers also have outbound mail operations and are full service. Otherwise, finding a mail fulfillment center is an option.

Contracting with a vendor to print ballots and accompanying mail ballot materials and handle the packaging, preparation, and mailing of ballot packets lessens the burden on the local election office. It also provides the most feasible option for quickly scaling up mail ballot delivery.

What general questions should you ask potential fulfillment center vendors?

- Do the potential vendors have prior experience with election mail?
 - Lack of election experience is not disqualifying, but proof of similar time-sensitive, individualized dynamic document packaging and mailing in a zero-error tolerance environment should be required.
- Do they have a designated point of contact assigned to your jurisdiction?
- Do they have USPS election mail knowledge and relationship?
- Are they a full-service mail facility as designated by USPS and can they show similar full-service projects?
- Do they have precise document (ballot) folding equipment?
- Does the facility have the necessary temperature and humidity controls for ballot storage, as specified by your voting system vendor?
- Can they show the ability to produce and deliver within statutory deadlines?
- Can they show the ability for the jurisdiction to track the mail for delivery?

What security questions should you ask potential ballot printing and/or fulfillment center vendors?

- Can they maintain a satisfactory chain of custody with your ballots?
- Can they demonstrate the physical security of ballots and their facilities?
- Do they use secure data transfer protocols?
- Do they observe cyber hygiene practices?
- Do they suggest a method for verifying that the voter file was transmitted and received accurately, such as hash validations of the digital data files and manual sampling?
- Do they perform a regular audit for accuracy (e.g., right ballot to right voter, everyone accounted for)?

There are some high-capacity election mail ballot print and fulfillment vendors—who are they?

- Your voting system vendor should have a complete list of its approved ballot print vendors and may know of some fulfillment centers.
- National organizations that host trade shows such as the Election Center, iGO (International Association of Government Officials), NASS, or NASED likely have a list of vendors seeking to do business with election officials.
- Check with list of National Presort Mailers for more information (<https://www.presortmailer.org/member-locator#/>)

Are there options to lease or share mail ballot packaging equipment?

If it may not be possible to find a full-service vendor or even a reliable fulfillment center in a short period of time:

- Check with mailing hardware vendors for options to obtain equipment yourself.
 - National organizations that host trade shows such as the Election Center, International Association of Government Officials (iGO), National Association of Secretaries of State (NASS), or National Association of State Election Directors (NASSED) likely have a list of vendors seeking to do business with election officials.
- Consider partnering with nearby election authorities but be aware of legal, logistical, and operational security issues.
- Consider partnering with other government officials inside the jurisdiction with high-volume mail requirements, such as taxing bodies or utilities, but be sure they can handle your specific folding requirements.

What do you do if your jurisdiction doesn't have access to vendors or technology to prepare ballot packets?

Some officials will need to do this increased work manually, using human labor. Remember that your staff are people too and will have health concerns. Prepare for staffing shortages. Build space as determined by Centers for Disease Control and Prevention (CDC) recommendations, the volume you must process, and the time you have to meet your deadlines. Considerations include the need to:

- Determine the size and ability of the labor force needed to work on their feet all day.
- Plan to protect their health by providing personal protective equipment, such as hand sanitizer and gloves, recognizing procurement of those materials has proven difficult.
- Design workspace appropriate to accommodate social distancing.
- Build a workspace suitable for the efficient arrangement of the higher volume of materials (ballots, envelopes, inserts).
- Lay out the workspace with physical security in mind, including proper access controls and logging protocols (ballot and envelope movements, entry and exit logs, etc.).
- Build in chain of custody practices to ensure correct ballot styles are issued, to verify that the number of valid applications received equals the number of ballots sent, and to control ballot stock.

Are there different considerations if you intend to print ballots on demand rather than printing in advance?

On-demand printing can help with space requirements and some storage protocols. However, it also introduces a potential single point of failure. Consider the following:

- Is the printing equipment approved to print tabulation system ballots?
- What are the power and space needs?
- Do you have trained staff who know how the printer works?
- Do you have a plan for bulk consumables (i.e., toner and ballot stock)?
- Can you control the physical access to the system?
- Can you control the software access to the system?
- Do you have systems in place to:
 - Ensure correct ballot style is issued?
 - Verify the number of valid applications received equals the number of ballots sent?
 - Control ballot stock?

Tracking ballots through the lifecycle can add value for the office and for voters—where do you begin?

Ballot tracking tools are relatively reasonably priced applications that improve operations in an elections office by providing information on when and where ballots are in the mail stream. (Check professional associations for a list of vendors.) USPS IMBs are valuable to election officials whether or not you intend to implement a voter-facing ballot tracking tool because they allow the election office to monitor ballots in the mailstream and identify delivery problems. The data can be used to answer voters' questions and alleviate election office concerns. On return ballots, IMB data is used in some states if a ballot does not have a required postmark. In addition, IMBs can improve voter confidence by providing information about the status of their outbound and inbound ballot as well as when it is received by the election office. Some things to consider when using IMBs:

- Discuss the experience your fulfillment center(s) has using IMB data and attaching that data to a specific voter's ballot and by extension that voter's data record. To get the most value, the IMB should be embedded in the voter's record.
- Are you prepared to handle the cost of using IMBs from USPS and your fulfillment center(s)?
- Do you have staff who can use the IMB data to make management decisions internally based on expected mail flow?

What cybersecurity measures should you consider?

Using technology always comes with cybersecurity concerns. Luckily, there are free services available to election officials in this arena:

- ❑ CISA offers remote vulnerability testing of election systems, including voter registration databases used to generate data for mailing election ballots. Also, vendors and their data systems could be reviewed to help understand additional risks of partnerships.
- ❑ CISA offers vulnerability scanning of public facing websites and applications.

Other Resources

- ❑ [USPS 2020 Official Election Mail Kit](#)
- ❑ [USPS 2020 State and Local Election Mail - Users Guide](#)—The checklist on page 16 may be particularly important for localities handling mailing in house.
- ❑ [CCD envelope design workbook](#)—includes a lot of guidance as well as templates for envelopes. Also linked there: [How to design VBM envelopes for USPS](#)
- ❑ [A tool kit of materials for scaling up](#) sample designs and templates beyond the workbook
- ❑ [Vote at Home Webinars for Election Officials](#)
- ❑ [Scaling Up in 2020](#): The Center for Civic Design's guide to the decisions and policies needed to support implementation of mail-in ballots for the 2020 elections
- ❑ USPS Mailpiece Design—For assistance with mailpiece design questions and review of your mailpieces, please contact a Mailpiece Design Analyst by calling the MDA Support Center at 855-593-6093 or sending an email to mda@usps.gov. The MDA Support Center hours of operation are Monday through Friday, between 8:00 AM and 5:00 PM CST.
- ❑ Election Mail Problem Data Collection Site (www.electionmail.org)
- ❑ National Association of State Procurement Officials (NASPO) Cooperative Contracting Information (https://www.naspo.org/dnn/portals/16/documents/Cooperative_Purchasing0410update.pdf)
- ❑ US General Services Administration (GSA) Cooperative Purchasing Program. (<https://www.gsa.gov/buying-selling/purchasing-programs/gsa-schedules/schedule-buyers/state-and-local-governments/cooperative-purchasing>)