I am Kate Doran, Elections Specialist, here today representing the League of Women Voters of New York State. The League is a nonpartisan and political organization which working to promote civic responsibility through informed and active participation of citizens in government. In New York State, we have 48 local leagues across the state, actively engaged in their communities and working to help voters understand and participate in elections. The right of every citizen to vote has been a basic League of Women Voters principle since our founding in 1920.

The League is very pleased to be here, talking about “Implementation,” of Early Voting in the City of New York. We were among the lead organizations that worked for years, to achieve voting reform in NY. So, thank you, City Council Members for inviting us to testify today.
Preparing for Early Voting might be compared to the change from the lever machines to the scanners that happened in 2010. In that case though, preparation happened over the span of years. October 26th is less than 6 months away, and whatever preparation is happening is invisible to the public. While we understand that Early Voting has many interconnecting parts, and that there are complexities in NYC that smaller counties in the state will not have to consider, we have many more questions than answers.

**Early Voting Poll Sites**

Many of NY State’s 62 counties will need only one Early Voting polling site. This is certainly not the situation in NYC. The legislative finding underlying the Early Voting statute is that one early voting polling site should meet the needs of up to 50,000 people, but then it limits the maximum number mandated to just seven sites. If New York City and other counties with millions of voters have only the mandated minimum of seven early voting sites, the voters of those counties will be clearly underserved. The law provides that Boards of Election can provide more than seven sites, and it is obvious that to provide voters in those larger counties, “convenient” access to early voting, (another statutory criteria), more sites will be needed.

Will all counties in NYC have equitable access between them? Several months ago we asked the NYC Board of Elections to involve the voting public in the site selection process. In response, one Commissioner said that the people who voted on this didn’t understand the ramifications and characterized the situation as a “Logistical Nightmare.”
We understand that 2019 is likely to be a low turnout year, with only the most partisan, dedicated, or high information voters participating. We appreciate, that as some have suggested, the BOE may be thinking of 2019 as a test run, for 2020. Is that the case? If so, why not be transparent, and engage the voting public? The League believes that the number of voting sites should be commensurate with the number of voters. Thus, the League supports more than seven early voting sites in Brooklyn, the Bronx, Manhattan, and Queens.

We urge the BOE to designate the largest number of sites possible, given the constraints of ADA compliance, voting equipment and available poll workers.

**Poll Worker Recruitment & Training**

We have heard nothing at all on the topic. Does the BOE believe that they can’t discuss it until after Early Voting site selections are made? Or is recruitment and training complicated by the statutory July to June certification period for poll site Inspectors? We look forward to hearing the board’s plans for recruiting, training, assigning, and compensating poll workers. Similarly we look forward to the board’s plans for informing voters.

**Communications Plan**

The Early Voting statute says, “Each board of elections shall create a communications plan to inform eligible voters of the opportunity to vote early.” We have not seen any such plan. We are pleased however to see a graphic announcement of Early Voting,
prominently placed on the Home Page of the Board’s website. While we have confidence that the board will comply with the statute, we urge the board to do more. The statute does not indicate when a communications plan shall be produced. We urge the board to quickly produce a draft plan, and to incorporate public input, in any final version.

**Early Voting Machines & Systems**

The League of Women Voters strongly supports full and equal voting rights for all eligible Americans, including persons with disabilities. However, we also believe that no one’s right to vote has meaning if the voter cannot be reasonably assured that their vote was counted as cast.

Maintaining the integrity of our electoral process is critical to America’s democratic institutions. But to be ultimately successful, a voting system must have the confidence of voters in its security and reliability. If voters choose not to vote because they do not trust the system by which they vote, we will have lost the battle for full participation by all of our citizens, which is the cornerstone of our democracy.

Back in 2005, the League of Women Voters of the United States and the League of Women Voters of New York State adopted the following statement of position on criteria for voting systems. The Citizen’s Right to Vote Resolution reads: “In order to ensure integrity and voter confidence in elections, the LWVUS supports the implementation of voting systems and procedures which are secure, accurate, recountable and accessible.”
Public confidence in the election process is directly linked to the transparency of the process and in 2010 we added transparency to our standards (“S.A.R.A.T.”)

In 2005 the League of Women Voters of New York State endorsed precinct-based paper ballot optical scan voting with the addition of a ballot marker to provide accessibility. We believed that this mature technology best met the criteria because it provides an actual ballot for recount purposes if that is necessary. A perfect and completely error-proof system does not exist. However, a paper-based system, which has been rigorously tested by independent authorities and operates according to prescribed federal and state standards and procedures does provide the best guarantee for secure and accurate elections.

New technology is not the whole solution – voting machines are only one part of a voting system. Voting machines function within a larger legal and administrative structure. Many of the risks inherent in the use of particular voting systems can be substantially reduced by improving such management practices as personnel training and by instituting rigorous administrative and chain of custody procedures.

ACCOUNTABILITY, OPENNESS AND TRANSPARENCY

- Require bipartisan or third-party monitoring of sensitive election procedures
- Require tracking and documentation of all procedures from the testing of machines to the handling of ballots.
- Require transparency in the operation and management of voting systems.
TESTING

- Test every voting machine to ensure it is operating properly
- Perform uniform, public testing of voting systems.
- Verify that any machines used are the same as the systems that were certified.

PHYSICAL PROTECTING OF VOTING SYSTEMS

- Restrict physical access to all components of voting systems.
- Maintain and operate voting systems in isolation from networks and the Internet.

PREPARATION PRIOR TO EARLY VOTING DAYS

- Educate voters on the use of all voting equipment both in advance of the election and in the polling place.
- Provide adequate training for all Early Voting workers.

ON EARLY VOTING DAYS

- Ensure adequate technical support to poll workers.
- Provide a back-up plan in the event of machine failure.

AFTER EARLY VOTING DAYS & ELECTION DAY

- Design a routine process that checks for problems that may have occurred but have not been visible on Election Day.
Early Voting will ensure greater access to the franchise than New York Voters have ever had before. We expect many city voters will want to take advantage of this new opportunity. We hope the NYC Board of Elections will take advantage of the support we are eager to provide.