## **Andrea Gyger**

From: Rebecca Gorrell <rebecca@coparticipationproject.org>

Sent: Monday, September 30, 2013 9:49 PM

To: SoS Rulemaking

**Subject:** Proposed Rulemaking Related to Election Rules Recodification- Comments

Follow Up Flag: Follow up Flag Status: Flagged

The Honorable Scott Gessler Secretary of State Department of State 1700 Broadway Denver, CO 80290

## Re: Proposed Rulemaking Relating to Election Rules Recodification

## Dear Secretary Gessler:

The Colorado Participation Project (CPP) is a nonpartisan nonprofit which supports nonprofits in their civic engagement and advocacy efforts. Together with our partners, CPP delivers and supports voter engagement opportunities to communities served by the nonprofit community across our state. We coordinate agency-based voter registration efforts that are effective and nonpartisan.

Agency-based voter registration works very well at engaging people in the democratic process. Individuals are offered voter registration at the same time they are completing other paper work and as a result, they are more likely to take the time to complete that voter registration form.

The proposed Rule 17 creates new barriers for already overworked agency staff that help individuals who otherwise may not be offered the opportunity to register to vote. In 2012, we supported 31 organizations across the state to incorporate voter registration into their services.

As the designated Voter Registration Drive Agent, we train and continually engage agency staff so they can offer registration to their communities. Requiring every individual we work with to go through the webinar, thus eliminating the "train the trainer" method that is currently in the rules, means our partners, programs and community will be significantly burdened. We take great care in how we train circulators and monitor their progress. We do not think that this new requirement is needed to ensure VRD compliance.

Thank you for the opportunity to comment on the proposed rules.

Sincerely,

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Rebecca Gorrell, MNM | Program Director Colorado Participation Project 789 Sherman Street, Suite 250 Denver, CO 80203 Office: (720) 359-2175

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