



Page #	Line #	Rule	Comment
2	28 - 32	2.13.2	Larimer County supports striking rule 2.13.2, as doing so will streamline our Voter Service and Polling Center processes.
2 - 3	34 - 35 1 - 2	2.14.4	Larimer County currently runs several critical reports during regular business hours up to and through Election Day. Ex: EXP-004, Ballot Verification System Export. We run the EXP-004 prior to Incoming Scan on our Ballot Sorter, to guarantee that our Ballot Sorter has the most up to date data. We must be able to run this report on demand.
5	35 - 38	7.5.10	Disassociating counting batches from any SCORE batch numbers will be detrimental to canvass, recount, Risk Limiting Audit, etc. The batch number "shuffle" needs to occur <i>after</i> the deadline to request a Recount.
6	1 - 10	7.5.11	The requirement to scan and electronically transmit envelope images will add a major staff burden, may require the hiring of additional Election Judges, etc. <i>Update language: a County must timely forward a ballot to the correct county, but may also scan and transmit electronically.</i> If a ballot envelope image is electronically transmitted, received into SCORE and signature verified, but the physical ballot envelope is never received, there should be some specific process for resolution.
	32 - 40	7.5.14 (A)	This treats Unaffiliated voters differently, because their ballots are reviewed for intent if they return more than one, and an Affiliated voter's ballots are <i>not</i> reviewed for intent if they return more than one. Sometimes, Affiliated voters mistakenly return multiple ballots from different/previous elections.
6 - 7	41-42 1-2	7.5.14 (B)	<i>Strike "in the mail ballot return envelope." Replace with "separately." Updated language should read: "and retain them separately as an election record."</i> Although these should be recorded and retained as election records, to protect voter privacy, voted ballots should not be retained with the voter's envelope and identifying information – <i>especially</i> once the envelope has been unsealed.

8	34 - 36	7.17	<p><i>Strike "and date."</i></p> <p>Requiring counties to scan not only the elector's signature but also the date (whether this is the "date signed" or the "date received") will prohibit sorter counties from uploading the cropped signature images captured by their sorter. These images include the elector's signature, but not the date. There is no efficient alternative to uploading the cropped signature image. Any alternative would require a fully manual process.</p>
9	1 - 7	8.1.5	<p>Because statute/rule/policy change so frequently, recommend requiring updated training certificate every year or before every election. If a watcher receives a certificate on November 2017, as the Rule is currently written, their certificate is valid for the 2017 Coordinated, 2018 Primary and 2018 General elections (through December 31, 2018). However, with changes to law, the training they received may no longer be up to date/accurate.</p>
14	1 - 3	20.17.3	<p><i>Strike "write-once,"</i> so that counties have the option of using more up-to-date encryption technology.</p>
18	24 - 28	25.2.2 (E) (3)	<p>Will not balance due to anomalies at ballot removal (no ballot in envelope, multiple ballots in envelope, wrong ballot in envelope, etc.). These ballots will read as "accepted" in SCORE, but will never advance to tabulation.</p> <p>25.2.2. (D) requires the CVR export to be generated on the ninth day after Election Day. This does not allow Counties enough time to balance all received ballots (including provisional ballots and property owner ballots) by the ninth day after Election Day, especially in consideration of the fact that ballots are still being received and counted through the eighth day after Election Day.</p>
<p>Discussion at RLA Training stated that Recount would be included/addressed in Rule – nothing referenced here.</p>			

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