



December 5, 2025

Colorado Department of State  
Red Rocks Conference Room  
1700 Broadway  
Denver, CO 80290

RE: LWVCO comments for Dec 5, 2025 Colorado Department of State Rulemaking Hearing

The League of Women Voters of Colorado (LWVCO) is very pleased that the Department of State is writing rules for multi-county instant runoff voting (IRV) elections. We are hopeful that the Department of State will soon write rules for the other type of ranked voting allowed in 1-7-1003 C.R.S., namely, single transferable vote (STV). As the IRV rules are written, please consider using broad language so that, whenever possible, the rules are applicable to STV.

We also have some recommendations around terminology, with the goal of providing a good description and consistency throughout the Election Rules.

- Change runoff tabulation entity to **ranked voting tabulation entity** (RVTE) – Some jurisdictions in Colorado conduct runoff elections, but they don't need a special tabulation entity so we suggest changing to the "ranked voting" descriptor. In addition, different ballot contests will have different RVTEs. Maybe Boulder County will be the RVTE for all the Longmont elections, but Erie will be the RVTE for all the Erie elections. Longmont and Erie have voters in both Boulder and Weld Counties.
- Change combined canvass board to **multi-county canvass board** – "Multi-county" is more descriptive and less vague.
- Change first rankings to **first-choice ranks** to be consistent with rest of Rule 26.
- Change race to **contest** to be consistent in the Election Rules, where "contest" is used much more often than "race."

Attached is a letter dated September 10, 2025 that LWVCO sent to Department of State officials asking for the promulgation of rules for the proportional ranked voting method known as single

transferable vote. STV has been authorized since the enactment of HB08-1378. It's time to help municipalities and county clerks conduct proportional ranked voting elections.

Sincerely,  
Celeste Landry  
LWVCO Legislative Action Committee



Jena Griswold, Secretary of State  
Judd Choate, Director, Division of Elections  
Jessi Romero, Voting Systems Manager  
Dwight Shellman, County Regulation & Support Manager  
Colorado Department of State  
1700 Broadway  
Denver, CO 80290

September 10, 2025

Dear Secretary of State Griswold, Director Choate, and Managers Romero and Shellman,

We, the League of Women Voters of Colorado, are writing to you because we would like to see more voting methods available for jurisdictions. We support electoral reforms that lead to better representation of the electorate and promote effective votes.

In this vein we support the options of proportional ranked voting and approval voting. Currently, county clerks cite lack of Secretary of State guidance for such elections as a barrier to adopting proportional ranked voting and approval voting.

We are asking that the Colorado Elections Division move forward with the actions below for proportional ranked voting (PRV) and approval voting:

- Certify the PRV portion of the ranked voting tabulation software that Colorado licenses. Also certify software to accept and tabulate approval voting ballots.
- Set rules for conducting risk-limiting audits (RLAs) of an approval voting election and set in motion the changes needed to do an appropriate audit of a PRV contest.
- Promulgate rules and procedures for conducting PRV and approval voting elections. Rule 26 is inadequate for PRV (aka single transferable vote) and doesn't mention approval voting. The procedures for county clerks to conduct PRV and approval voting elections are non-existent.

Please let us know what other actions are needed, including a specific directive from the General Assembly, in order for Colorado county clerks to be able to conduct PRV and approval voting elections and how our organizations can help in the effort.

Sincerely,

A handwritten signature in black ink that reads "Irene R. Tynes". The signature is written in a cursive, flowing style.

Irene Tynes  
President  
League of Women Voters of Colorado  
president@lwvcolorado.org