



The Honorable Adrian Fontes  
 Secretary of State  
 State of Arizona  
 1700 W. Washington St.  
 Phoenix, AZ 85007

Dear Secretary Fontes,

We would like to first thank the Secretary of State’s office for the opportunity to work collaboratively with your office in providing recommendations and comments on the Elections Procedures Manual (EPM). Since the EPM provides guidance to election officials on facilitating elections across the state of Arizona, we recognize the importance of ensuring that it contains provisions that protect the right to vote for all eligible Arizona voters.

After reviewing the 2025 EPM draft that was released at the beginning of August, we have compiled our list of recommendations and comments from our democracy coalitions for the final manual. Below are general recommendations, with our specific recommendations for changes marked in bolded red further below.

**General Recommendations**

- When determining voting locations, election officials must consult with community partners and Tribal governments to ensure an equitable distribution of these locations throughout the community and to prevent wait times for voting from exceeding 30 minutes.
- Polling places must be located in safe and convenient areas, free from the presence of police and ICE and not located in police stations."
- Election officials must hire bilingual poll workers and provide on-site and remote language services for voters who do not speak English.
- Officials must ensure that a voter’s gender identity or presentation on their ID does not affect their right to cast a ballot.

- Tribal IDs must be accepted in the online voter registration system.
- When sending election materials in historically unwritten languages, such as Navajo and Apache, officials must communicate to voters via radio and other spoken or auditory means.
- The Secretary of State should define what is a reasonable time period for election officials to respond to election-related requests for public information.
- Election day contingency plans should include scenarios for technology and printing issues, as well as notifying the Secretary of State and Tribal government if the polling location is on Tribal lands, if the wait time exceeds 30 minutes, or if a ballot has not been issued within 30 minutes.
- Uniform and standardized process for voters to submit documentary proof of citizenship, as per the current existing DPOC law, including at the polling location on Election Day.
- Recommend changing the format of the footnotes throughout the EPM. Currently, the footnotes restart at Footnote 1 for each chapter. This would seem confusing in citing specific footnotes in the EPM and seems unnecessary.

## **Coalition Recommendations and Comments**

### **Chapter 1: Voter Registration:**

- County/State Responsibility for Supplying Forms
  - Recommendation:
    - Recommend adding back the “at no cost” provision to the SOS providing federal forms: “The Secretary of State shall make Federal Forms (**at no cost**) available to all federal, state, county, local, and Tribal government agencies, political parties, and private organizations that conduct voter registration activities. *See* A.R.S. § 16-151(B).”
      - Reference: Page 2 of the 2025 EPM Draft.
- Registrants’ Submission of Documentary Proof of Citizenship (DPOC)
  - Comment:
    - Comment is based on the EPM’s referenced DPOC Submission Form. There needs to be a method for voters to submit DPOC on election day at polling locations. In many counties across Arizona, the county recorder’s office is located hours away, and voters may find out when they arrive at their polling location that they still need to submit DPOC.
      - Comment on this section: “The registrant may provide DPOC using the DPOC Submission Form in the letter sent by the County Recorder. A registrant who provides DPOC using a method other than the DPOC Submission Form must be made a full-ballot voter if the County Recorder has sufficient information to link the registrant’s DPOC with the registrant’s form on file.”
      - Reference: Page 8 of the 2025 EPM Draft
- Effect of Felony Conviction on Qualification to Register to Vote
  - Recommendation:
    - Recommend adding the following marijuana expungement and voter registration eligibility footnote to “A registrant may not register to vote if they have been

convicted of treason or a felony, unless their civil rights have been restored.”:

**“Footnote [X]: As of July 12, 2021, some marijuana-related convictions may be eligible for expungement, which could affect the individual’s eligibility for restoration, voter registration, and voting. A.R.S. § 36-2862. Individuals with expungement-eligible convictions can find petition forms and instructions adopted by the Arizona Supreme Court here: <https://www.azcourts.gov/prop207>.”**

- Reference: Page 20 of the 2025 EPM Draft

- Minimum Required Information on Registration Forms

- Recommendation:

- Recommend adding that failure to submit *optional* information must not be used to invalidate the voter registration: **"Failure to list optional information or failure to properly answer the age verification question on voter registration forms, does not invalidate the registration."**

- Reference: Page 26 of the 2025 EPM Draft

- Recommendation:

- Recommend adding DPOC to list in section of if missing, the voter registration should be entered in as “suspense” status if the County Recorder has their contact information to request it: "If the registration form does not contain the registrant’s name, residence address or description of residence location, DOB, **DPOC (if a state form)**, or signature (or assisting person’s signature), but the County Recorder has a mailing address, telephone number, or email address to contact the registrant to request the incomplete information, the registrant should be entered into the voter registration database in a “suspense” status until the incomplete information or a new voter registration form is received."

- Reference: Page 27 of the 2025 EPM Draft

- Recommendation

- Recommend removing the option of the County Recorder to set aside an incomplete VR form as the discretion to set aside is unsupported by statute and invites unequal treatment of forms, such as stuffing forms into boxes in the a closet, subverting the state’s public records laws in the process: “If a County Recorder does not have the necessary information to contact the registrant by mail, telephone, or email, ~~the registration form should be set aside and/or~~ the record should be entered in the voter registration database using the status code “suspense” and the reason code “insufficient information on registration form” (or functional equivalent)."

- Reference: Page 27 of the 2025 EPM Draft

- Recommendation

- Recommend adding "(including DPOC)" to section of information that can be received by election day at 7 PM in sentence: "If the County Recorder receives

the missing, incomplete, or illegible information (**including DPOC**) by 7:00 p.m. on Election Day, the registrant is deemed to have been registered on the date the registration was first received or dated. A.R.S. § 16-134(B); A.R.S. § 16-121.01(A)."

- Reference: Page 27 of the 2025 EPM Draft
- Recommendation
  - Recommend updating Footnote 16 in Chapter 1 of the 2025 EPM Draft to replace language of "should" to "is" and "should" to "shall" regarding DPOR: "Footnote 16: A registrant **is should**-not to be placed in a "suspense" status solely for providing a description of residence location or other nonstandard residence address. In such cases, County Recorders **shall-should**-make all reasonable efforts to ascertain the registrant's physical residence location and **shall-should** only deem the residence address field "incomplete" after such reasonable efforts failed."
    - Reference: Page 27 of the 2025 EPM Draft
- Electronic Verification Procedures
  - Recommendation
    - On-line voter registration must be reformed in order to permit Tribal IDs to be used in online voter registration.
      - Reference: Page 29-30 of the 2025 EPM Draft.
- Issuance of Voter Registration Cards
  - Comment
    - Comment on when a "*County Recorder shall issue a voter registration card to any new registrants and may, at the discretion of the County Recorder, issue a new card to existing registrants who update their name, address, or political party preference.*"
    - Comment is "When [a] registration form is filled out, signed by the elector and received by the county recorder, it shall constitute an official public record of registration of the elector." 16-161(A). "After placing the record of registration in the county general register, the county recorder shall notify the elector within thirty days in writing that the elector's name appears in the general register." 16-163(B). "The county recorder may modify the record of registration to reflect any changes of address, name or party on receipt of a registration form reflecting such changes." 16-164(A). The 2023 EPM interprets these statutes to require the notice of "record of registration" (i.e., an voter registration card), only for brand-new registrants. That is not the only reasonable interpretation of these three statutes. That 16-164(A) authorizes recorders to update the existing "record of registration" with new information received on a new form, does not nullify 16-161(A)'s command that a registration form, once completed by the voter and received by the county recorder, becomes a "record of registration" under 16-161(A), thus triggering 16-163(B)'s notice requirement. Indeed, the 2023

EPM includes additional guidance stating that existing voters impacted by redistricting or re-precincting "should" be issued new registration cards, but declines to extend this guidance to voters who update their name, address, or party. The more faithful interpretation is one that gives meaning to each of the three "record of registration" provisions in statute, including 16-161(A). Any new registration that substantively alters the voter's registration (name, address, party, precinct, etc.) triggers the requirement that a new voter registration form be issued.

- Reference: Page 30 of the 2025 EPM Draft.

- Minority Language Assistance

- Recommendation

- Recommend adding "**and appropriate Tribal governments**" to section on who jurisdictions must make direct contact with regarding publicizing materials. Tribal governments serve as the official representation of the Tribal nations and those within their jurisdictions and should be included in addition to the "language minority groups": "Jurisdictions must take appropriate steps to publicize the availability of materials and assistance in the minority language; some examples of means to publicize the availability of assistance include making announcements over minority language radio or television stations and direct contact with language minority group organizations **and appropriate Tribal governments**. 28 C.F.R. § 55.18(e)."

- Reference: Page 59 of the 2025 EPM Draft

## Chapter 2: Early Voting

- Incomplete Ballot-by-Mail Requests

- Recommendation:

- Recommend moving "mail" as a "last resort" option for contact in section regarding incomplete ballot by mail requests. "If a ballot-by-mail request does not contain the voter's name, residential address or description of residence location, date of birth, party ballot designation (for voters not registered with a recognized political party who are requesting a ballot-by-mail for a partisan primary election), or other verifying information, the County Recorder must notify the voter (~~by mail, by~~ telephone, text, email, **and/or mail, as a last resort**) within a reasonable period if the County Recorder has sufficient contact information to do so."

- Reference: Page 63 of the 2025 EPM Draft

- Required Instructions to Voters

- Recommendation:

- Recommend removing "there should be" and added "shall be" regarding publicity of instructions in minority languages that are sent by mail: "For materials provided by mail, ~~there should be~~ appropriate publicity measures **shall be** taken to advertise the instructions of returning ballots by mail in minority languages,

including traditionally unwritten languages, covered by Section 203 of the Voting Rights Act. 28 C.F.R. § 55.18(a)."

- Reference: Page 73 of the 2025 EPM Draft

- Ballot Drop-Off Locations and Drop-Boxes

- Recommendation:

- Recommend adding Tribal consultation regarding use of Tribal building as a ballot drop-off location: "A ballot drop-off location or drop-box shall be located in a secure location, such as inside or in front of a federal, state, local, or Tribal government building **(in consultation with the Tribal government)**. "

- Reference: Page 78 of the 2025 EPM Draft

- County Recorder Responsibilities - Signature Verification

- Recommendation:

- Recommend adding a deadline of when the County Recorder must compare the signature on the affidavit once its been received. The current draft says "upon receipt" which allows and has allowed for delays in counting early ballots: "Upon receipt of the return envelope with an early ballot and completed affidavit, a County Recorder or other officer in charge of elections shall **within one business day** compare the signature on the affidavit with the voter's signature in the voter's registration record **so that they can provide the reasonable and meaningful notice described below as needed.**"

- Reference: Page 89 of the 2025 EPM Draft

- Recommendation

- Recommend adding the following paragraph to this section regarding ballot tracking: "**As part of the early ballot tracking, County Recorders shall provide the Secretary of State the total number of ballots received and in ballot processing, including a breakdown of the total number of voters County Recorders have contacted to cure their ballots and the ballots waiting a signature to be cured by 5 p.m. every evening after election day until the ballot cure deadline. This information shall be made publicly available on the Secretary of State's website every day after election day until the ballot cure deadline.**"

- Reference: Page 89-92 of the 2025 EPM Draft

- Recommendation:

- Recommend adding the following paragraph to this section regarding who the County Recorder should send the updated list of voters whose signatures are missing or inconsistent to the political parties AND to non-partisan voter advocacy groups per Arizona public records law: "**Also as part of the early ballot tracking, the county recorder or other officer in charge of elections shall provide updated lists of (a) all voters whose ballot signatures are deemed inconsistent with the voter's registration record signature, and (b)**

**all voters who voted with a conditional provisional ballot daily to all political parties qualified for continued representation on the state ballot. The above information shall be provided daily beginning on the Wednesday immediately following the election through the end of the signature cure period after a primary, general, or special election that includes a federal office, or the third business day after the election for any other election. A.R.S. § 16-550(A). Consistent with Arizona public records law, the county recorder or other officer in charge of elections shall also promptly provide the above lists to non-partisan voter advocacy groups upon request, with any non-public information therein redacted. A.R.S. §39-121 et seq."**

- Reference: Page 92 of the 2025 EPM Draft

- Eligible Voters in Jails or Detention Facilities

- Recommendation:

- Delete the "To the extent practicable" in the following sentence of section: "~~To the extent practicable~~, County Recorders shall coordinate with the county sheriff's office, jail, or detention facilities, the county public defender's office, and other appropriate stakeholders to develop and implement reasonable procedures to facilitate voter registration and voting, including the receipt and return of a ballot-by-mail, by eligible voters held in jail or detention facilities."

- Reference: Page 98 of the 2025 EPM Draft

- Recommendation

- Recommend adding to section how vote centers can legally be established on-site at jails and can be more effective than mail-in voting at jails. Offering recommendation as a permitted option: "**It is also permitted under state law to establish a Vote Center within the jail so that eligible, incarcerated individuals may cast votes in person. Procedures for jail voting shall ensure full compliance with the Americans with Disabilities Act (ADA), including but not limited to the provision of necessary reasonable accommodations in voting.**"

- Reference: Page 97-98 of the 2025 EPM Draft

### Chapter 3: Ballot-by-Mail Elections

- No Comment / Recommendations

### Chapter 4: Voting Equipment

- Security Measures for Electronic Voting Systems - E-Pollbooks and Ballot-on-Demand Printers

- Comment:

- Comment on the following section: "E-pollbooks and ballot-on-demand printers, as well as other peripheral devices such as barcode printers and driver license scanners, shall be tested before each election to ensure proper operation." Given ballot-on-demand printer failures during previous elections (Maricopa County in 2022 and Apache County in 2024), there should be continued conversations on

how to improve the testing and updates of ballot-on-demand printers. There may need to be additional check-ins with counties regarding their testing procedures and timelines for their election equipment to ensure further such issues do not continue to happen in future elections.

## Chapter 5: Accommodating Voters with Disabilities

- Voter Registration Information
  - Recommendation
    - Recommend removing "if practicable" from the following section, as “best efforts” and “if practicable” are two different standards: "If a voter makes a request for information in an alternative format after any applicable deadlines, the County Recorder or officer in charge of elections shall make best efforts to accommodate the request if practicable. "
      - Reference: Page 123 of the 2025 EPM Draft
- Alternative Voting Options
  - Recommendation
    - Recommend adding "alternative means" to the following section: "**Alternative means of voting shall be provided at polling places and vote centers ~~Locations~~ determined by the officer in charge of elections to be inaccessible ~~may be used as polling places and vote centers, with alternative means of voting provided at those locations,~~ only when:**"
      - Reference: Page 128 of the 2025 EPM Draft
  - Recommendation
    - Recommend removing “[w]henever practicable” regarding curbside voting and requiring it as a reasonable accommodation for disabled voters. We aim to continue highlighting the importance of curbside voting as an alternative voting option for voters, particularly for those located in areas that may not be accessible due to factors beyond the control of election officers. Communities have utilized curbside voting to ensure that voters with disabilities have access to the voting process, and in some communities, it is the only method available for this group of voters to exercise their right to vote. Curbside voting must continue to be made available.
    - “~~Whenever practicable~~, Curbside voting ~~should~~ **must** be made available as a reasonable accommodation to provide voters with disabilities equal access to the voting process.”
      - Reference: Page 129 of the 2025 EPM Draft
  - Recommendation
    - Recommendation and comment on the link “<https://www.ada.gov/resources/protecting-voter-rights>.” in Footnote 8 in Chapter 5. The link may have been archived by the current administration or

moved, and currently, it leads to a page that says “**Page not found.**” Either way, this link must be updated.

- Reference: Page 129 of the 2025 EPM Draft - Footnote 8

## Chapter 6: Regulation of Petition Circulators

- Paid Circulators
  - Recommendation:
    - Recommend adding a sentence to emphasize that a circulator must register for a petition, and having a number isn't enough: "**A circulator number alone does not ensure the circulator has registered for a particular petition, see Subsection C below.**"
      - Reference: Page 132 of the 2025 EPM Draft

## Chapter 7: Presidential Preference Election

- No Comment / Recommendations

## Chapter 8: Pre-Election Procedures

- Establishing Voting Locations
  - Recommendation:
    - Recommend moving Chapter 8 - Footnote 1 and placing it in the main text regarding required consultation with Tribal governments on ensuring a reasonable and adequate number of voting locations are located near or on Tribal lands. A footnote suggests it as an afterthought instead of a requirement. "Counties that have Tribal lands located within the county shall consult with the appropriate Tribal government to ensure that a reasonable and adequate number of voting locations are located on or near Tribal lands for the election."
      - Reference: Page 141 of the 2025 EPM Draft
- Factors to Consider When Selecting Voting Locations
  - Recommendation
    - Recommend changing "should" to "must" to require counties to consider placing a voting location on Tribal lands in consultation with the Tribal government. This aligns with Footnote 1 of Chapter 8 (see above), which requires counties with Tribal lands to consult with Tribal governments to ensure that there are voting locations near or on Tribal lands. "For Counties that have Tribal land located within a precinct, the County **must should** consider placing voting locations on Tribal lands in consultation with the tribe(s)."
      - Reference: Page 144 of the 2025 EPM Draft
- Polling Place/Vote Center Emergency Designation
  - Recommendation:
    - Recommend adding an electioneering paragraph to the section, as non-partisan election monitoring and educating voters, such as Election Protection, is not considered “electioneering”. “**Electioneering and other political activity**” does

**not include activities such as election monitoring and educating voters as to their rights, if conducted in a non-partisan manner. Such non-partisan election protection activities shall be permitted at all voting locations. See A.R. S. § 16-515(I) (“For the purposes of this section, electioneering occurs when an individual knowingly, intentionally, by verbal expression and to induce or compel another person to vote in a particular manner or to refrain from voting expresses support for or opposition to a candidate who appears on the ballot in that election, a ballot question that appears on the ballot in that election or a political party with one or more candidates who appear on the ballot in that election”).”**

- Reference: Page 145-46 of the 2025 EPM Draft

- Bilingual Poll Workers

- Recommendation:

- Recommend replacing "should" with "must" and removing "or" for appointment of bilingual poll workers for jurisdictions covered under the language minority provision of Section 203 of the VRA. "Jurisdictions covered under the language minority provisions under Section 203 of the Voting Rights Act **must should** appoint bilingual poll workers and ~~for~~ ensure access to on-site or remote interpretation services in the covered language(s) to provide language assistance to voters who need it."

- Reference: Page 151 of the 2025 EPM Draft

- Recommendation:

- Recommend replacing "should" with "must" for working with Tribal govt. For the recruitment of bilingual poll workers in Section 203 covered jurisdictions. The change from “contact” to “work with” is a significant shift that encourages more than just contacting the Tribal government; it promotes collaboration. We also want to point out that a period is needed here and is missing after this sentence: "Covered jurisdictions for Tribal languages **should-must** work with the applicable Tribal government regarding recruiting and hiring bilingual poll workers.”

- Reference: Page 151 of the 2025 EPM Draft

- Poll Worker Training

- Comment:

- This change is commendable as a step towards ensuring voting equipment failures on election day can be mitigated and are working properly. This is to prevent scenarios such as the printing of ballots issue during the 2024 General Election in Apache County from happening again. “8. Voting equipment checks, including ensuring that ballot-on-demand printers function properly, and that equipment seals have not been tampered with and match the seal log;”

- Reference: Page 152 of 2025 EPM Draft

- Recommendation
  - Recommend removing “when practicable” from list item 10: “10. Operation of e-pollbooks or procedures for managing the signature rosters and poll lists, including procedures to facilitate perfection of registration of voters in suspense or inactive status **when practicable;** ”
    - Reference: Page 153 of 2025 EPM Draft
- Observation at Voting Locations
  - Recommendation:
    - Recommend adding the following sentence to the section. “Observers may not interfere with any voter’s right to a secret ballot. A.R.S. § 16-580(B). ”
      - Reference: Page 156 of 2025 EPM Draft
- Printing and Mailing Official Sample Ballots to Households
  - Recommendation:
    - Recommend adding to the acceptable ID requirements a reference to the specific ID requirements for Native American voters, "Must include the list of acceptable forms of identification to vote at a voting location pursuant to A.R.S. § 16-579(A)(1), **including identification requirements for Native Americans, Ch. 9, IV(B);** and "
      - Reference: Page 178-79 of 2025 EPM Draft
- Language Minority Voting Materials
  - Recommendation:
    - Recommend expanding this section to encourage translations of Spanish and previously covered languages, even if not covered under Section 203. Recommendation would be to add “languages that are commonly spoken in the area...”. Part of this is also taking into account that Arizona is home to 22 federally recognized Tribes; however, only five of those Tribal languages are covered under Section 203 and are spread between seven counties. While federal law only requires these five Tribal languages within seven out of the fifteen counties, the EPM should encourage counties to still make efforts to provide translations in these languages, as well as other non-covered languages, like it does with Spanish. “Nonetheless, counties and other political subdivisions are strongly encouraged to continue to provide voting materials and language assistance in Spanish, as well as other languages previously required in the county **and languages that are commonly spoken in the area, such as Tribal languages not covered under Section 203.**”
      - Reference: Page 179 of the 2025 EPM Draft
- Voting Materials Required to Be in Minority Language(s)
  - Recommendation
    - Recommend replacing “should” with “must” in this new addition. The new addition features the strong language of “work with Tribes” and is a great

addition that encourages collaboration instead of just contact. However, this can be stronger by requiring it with language such as “must” instead of “should”. “The Secretary of State and Counties ~~should-must~~ work with Tribes to ensure that language translations and interpretations are accurate.”

- Reference: Page 180 of the 2025 EPM Draft

- Implementing a Wait Time Reduction Plan

- Comment:

- Commenting on the importance of the newly added “[o]n Tribal Reservations, counties should, to the extent possible, match precinct boundaries to Tribal subdivision boundaries,” in the section. The matching of precinct boundaries to Tribal subdivisions will assist voter registration by placing voters in the correct precincts. This can help reduce the number of voters on the suspense list and reduce the number of ballot rejections caused by out-of-precinct voting.

- Reference: Page 188 of the 2025 EPM Draft

- Developing and Contingency Plans

- Recommendation:

- Recommend adding that if there are reported delays in either opening the polling location or failure to operate due to equipment failure, such updates should be posted to the SOS website. “If, for any reason, a voting location fails to issue ballots for longer than thirty minutes due to equipment failure, or the wait time exceeds one hour, the inspector will inform the officer in charge of elections. The officer in charge of elections will promptly inform the Secretary of State of the delay, along with planned resolutions. **Delays in opening or failure to operate longer than thirty minutes will be posted on the Secretary of State’s website.**”

- Reference: Page 191 of 2025 EPM Draft

## Chapter 9: Conduct of Elections/Election Day Operations

- Opening the Voting Location

- Recommendation:

- Recommend replacing “should” with “must” in notifying the SOS office and the Tribal government if there is a delay in the opening of the voting location. Also recommend removing the parentheses around the part of the sentence referencing the notification of the Tribal government. The parentheses make the notification to the Tribal governments seem more of an afterthought, and it was not in parentheses in the 2023 EPM: “If a voting location does not open at 6:00 a.m., the county ~~should-must~~ notify the Secretary of State’s Office as soon as possible (and if the location is on Tribal land, the county should also notify the Tribal government).”

- Reference: Page 200 of the 2025 EPM Draft

- Preserving Order and Security at the Voting Location - Enforcing Electioneering Ban
  - Recommendation:
    - Recommend adding “**Electioneering’ does not include activities such as election monitoring and educating voters about their rights, if conducted in a non-partisan manner. Such non-partisan election protection activities shall be permitted at all voting locations.**”
      - Reference: Page 201 of the 2025 EPM Draft
  
- Preventing Voter Intimidation
  - Recommendation:
    - Recommend adding to section that failure to respond to certain incidents of voter intimidation can lead to liability for the election officials. “The officer in charge of elections has a responsibility to train poll workers and establish policies to prevent and promptly remedy any instances of voter intimidation. A.R.S. § 16-1013. **A failure to adequately respond to certain incidents of voter intimidation can lead to liability on the part of counties and election officials. See 42 U.S.C. § 1986.**”
      - Reference: Page 203 of the 2025 EPM Draft
  
- Checking Voter Identification
  - Recommendation:
    - Recommend replacing "should" with "must": "Voter identification that includes a nonstandard address ~~must should~~ be found to reasonably match if the county has modified the residence address in the roster or e-pollbook and the city or town on the identification matches the city or town on the roster or e-pollbook."
      - Reference: Page 205 of the 2025 EPM Draft
  
- Circumstances Requiring Issuance of a Provisional Ballot - Voter Changed Their Name
  - Recommendation:
    - Recommend replacing "may" with "shall" regarding updating the voter’s information if the election has real-time access to voter registration records: "However, if the election board has real-time access to voter registration records, the voter’s information ~~may shall~~ be updated at the voting location upon completion of a new voter registration or address update form."
      - Reference: Page 211 of the 2025 EPM Draft

## Chapter 10: Central Counting Place Procedures

- County Recorder Responsibilities - Verification of Provisional Ballots
  - Recommendation:
    - Recommend adding to list item 7. Of Verification of Provisional Ballots: “If the voter is registered as a “federal-only” voter, **or listed as rejected pending DPOC**, confirm that the voter received a “federal-only” ballot, **or provided DPOC at the voting location, in which case the voter’s status is to be changed to “full ballot”**. **Otherwise or** clearly mark or stamp the outside of the

provisional ballot envelope to indicate that the voter is a “federal-only” voter and only races for federal candidates should be duplicated and tabulated.”

- Reference: Page 237 of the 2025 EPM Draft

- County Recorder Responsibilities - Rejection Reason Code
  - Recommendation:
    - Recommend adding additional new list item to the list of Rejection Reason Code[s] in section. Recommend adding the following rejection code reason: **“Registered in other county;”**.
      - Reference: Page 238 of the 2025 EPM Draft

### **Chapter 11: Hand Count Audit**

- No Comment / Recommendations

### **Chapter 12: Post-Election Day Procedures**

- No Comment / Recommendations

### **Chapter 13: Certifying Elections Results**

- Accessibility Report
  - Recommendation:
    - Recommend adding to list 1. on what should be stated in post-canvass accessibility report: "1. The number of early voting and Election Day voting locations in the county, **and whether curbside voting was available at each location;**"
      - Reference: Page 277 of the 2025 EPM Draft
  - Recommendation:
    - Recommend adding "tribal consultation" to language assistance requirement in accessibility report: "[7] If the jurisdiction is covered under Section 203 of the Voting Rights Act, a summary of the steps taken to provide language assistance to voters, including appointment of bilingual poll workers, access to on-site or remote interpretation services, **consultation with appropriate tribal government(s)**, and the availability of an Election Terminology Glossary in the covered language(s)."
      - Reference: Page 278 of the 2025 EPM Draft

### **Chapter 14: Campaign Finance**

- No Comment / Recommendations

With these recommendations and comments on the 2025 EPM draft, we aim to strengthen the manual to ensure every eligible Arizonan has the freedom to vote. We trust that you will consider these recommendations as you make revisions and submit the final version of the EPM.

Thank you for your consideration,

Sincerely,

Natalia Sells - All Voting is Local Action

All Voting is Local Action

American Civil Liberties Union of Arizona

Arizona Asian American Native Hawaiian and Pacific Islander Advocates (AZ AANHPI Advocates)

Arizona Democracy Resource Center Action

Arizona Native Vote

Arizona Students' Association

Common Cause Arizona

Mass Liberation Arizona

Progress Arizona

Protect Democracy

Wingbeat 88