

PREPARING FOR IN-PERSON VOTING DURING COVID-19: VOTING LOCATION REQUIREMENTS



Lessons Learned from the 2020 Primaries

- Anticipate losing voting locations due to the pandemic or due to insufficient poll worker staffing levels to maintain operations.
- Identify locations that accommodate social distancing, including innovative large scale locations such as sports facilities
- If possible, utilize government facilities for new voting locations to limit the number of voting locations that cancel close to the voting period.
- Consider expanding curbside or “drive-thru” voting options to maintain social distancing and offer access to voters with disabilities.
- Review guidance from manufacturers on [how to clean and sanitize equipment due to COVID-19](#).
- Work with other officials, including state governments and emergency managers, to access PPE.
- Consider distributing supplies used to vote such as pencils or pens as one time use supplies.
- Leverage existing tools and data sources to determine the best places to locate and design in-person locations.
 - Stanford-MIT Healthy Elections Project’s [COVID-19 Polling Place Queue Length Model](#)
 - University of Southern California Center for Inclusive Democracy [Voting Location Siting Tool](#)
- Review GCC and SCC working group documents on:
 - [Innovative Practices and New Solutions](#)
 - [Finding Voting Locations and Poll Workers](#)
 - [Considerations for Modifying the Scale of In-Person Voting](#)
 - [Health and Safety at the Polling Place](#)
 - [Safeguarding Staff and Work Environment from COVID-19](#)

Traditional in-person voting presents obstacles to following social distancing guidelines. In-person voting has historically involved physical interaction for voters through the check-in process, poll workers offering assistance to voters, or simply standing in line. Officials across the country have shifted the layout and design of their in-person locations to accommodate social distancing including spacing out voting booths and establishing a one-way flow through the voting location. Some have had to consolidate voting locations due to a limited number of poll workers and locations available in the primary. The Centers for Disease Control and Prevention (CDC) and the GCC have collaborated on guidance on preventing the spread of COVID-19 at voting locations. Election officials should refer to the latest [Considerations for Election Polling Locations and Voters](#) for the latest information on safely configuring and operating in-person voting locations.

Physical Distancing and Polling Place Consolidation

While voting locations and polling place design typically vary, some election officials are moving to voting locations that allow for poll workers and voters to maintain a safe physical distance. The lack of available poll workers may lead to polling place consolidations or the creation of vote centers. In addition, many

jurisdictions leverage nursing homes, senior care, and other healthcare facilities that are no longer available to them given concerns around COVID, or use government or private facilities that are now requiring temperature checks or other health screenings. Further, voting locations are subject to the same capacity restrictions imposed on many other locations, which means that election officials not only need to accommodate more space between people, they need to plan for few people permitted in the entire facility. Officials across the country have utilized alternative government facilities, innovative design concepts, and unique voting locations to conduct their primaries.

Louisiana had to move 10% of voting locations due to their normal proximity to at-risk populations in nursing homes and healthcare facilities. Similarly, multiple jurisdictions in Wisconsin had to consolidate polling locations. Madison Municipal Clerk Thomas Kund stated, “Madison was down about one third in terms of polling places. We usually have 90 and dropped to 65 this spring because of COVID. Some places said ‘we can’t have you here.’ We’re now trying to maintain and hopefully increase the number.”

Joe Gloria, Registrar of Voters in Clark County, Nevada, has traditionally placed voting locations in shopping malls and grocery stores. While these locations are easily accessible, they are also privately owned. After the outbreak of COVID, Gloria was concerned about the possibility of last minute cancellations for polling locations and worked to place vote centers in government facilities. This move will ensure that the 125 voting locations will be available on Election Day.

Officials across the country used the primary election to implement social distancing and capacity restrictions. Many polling locations featured markings or decals on the floor to maintain social distancing and the distribution of PPE to voters. The Governor of New Mexico issued an [executive order](#) limiting polling locations to serving four voters or 20% of a facilities capacity at one time and mandating social distancing to “minimize the risk of spreading COVID-19 through in-person voting.” Locations across the country also obtained or made plexiglass or plastic partitions to further separate poll workers and voters while maintaining visibility for all parties.

Some jurisdictions have leveraged voting super centers. For example, Jefferson County, Kentucky had one polling location for their primary election. The polling location was established at the Kentucky Exposition Center, a large convention center location which provided the necessary space to allow distancing while voters were in lines and while voting. Voters and election officials reported no wait times and an easy and safe process to cast their vote.

Following reports of long lines in areas of Atlanta, the Atlanta Hawks offered State Farm Arena to serve as a polling location in November with arena staff trained to serve as poll workers. Following that announcement, the Detroit Pistons [offered](#) their training facilities and headquarters as a voting center and the Milwaukee Bucks offered the Fiserv Forum a potential polling location. While all localities do not have access to a location the size of the Expo Center or an NBA Arena, localities should consider large venues that may not have normally served as polling locations but are otherwise vacant due to the pandemic including sporting and business venues.

This innovative use of space and staffing may create opportunities to vote while social distancing, but will also require officials to address the unique nature of conducting an election in a large scale facility. Officials should plan in advance to anticipate questions that may arise such as whether voters must be in their precinct

specific line at the close of voting hours or if being within the larger building or within a larger line within the location is sufficient or how to handle parking issues that may arise for voters. Officials should also consider physical safety requirements for voters, equipment, and supplies and anticipate any additional staffing that may be required to serve voters in large facilities.

If state law allows, officials can also provide the option of curbside or “drive-thru” voting. Election officials in Iowa, Wisconsin, and Virginia highlighted their use of curbside voting to the EAC. Officials in Kentucky worked to make this option available at locations that could provide that capability with Secretary of State Michael Adams stating, “[t]o us it was pretty obvious that we had to come up with a way to ensure public safety, of course, but also ensure that Mother Nature didn’t disenfranchise anybody.”

Managing the Flow of Voters when Choosing New Locations

The necessary consolidation of polling locations that occurs when there are inadequate poll workers can lead to the use of polling locations that are new to voters and the election officials conducting the election. When choosing a new location, election officials should consider the flow of voters both inside and outside of the building, utilizing resources as needed to ensure voters can safely access the building. Officials should review [Finding Voting Locations and Poll Workers](#) and the University of Southern California Center for Inclusive Democracy [Voting Location Siting Tool](#) for further guidance on locating new voting locations. For further information on managing the flow of voters, officials should consult the Stanford-MIT Healthy Elections Project’s [COVID-19 Polling Place Queue Length Model](#).

In addition to necessary considerations to ensure voters with disabilities have access to polling locations, election officials should consider a layered approach to minimize traffic and ensure the orderly flow of voters into a limited parking area. One such approach was in Kentucky which included both [free shuttle service](#) to the polling location and the use of National Guard to direct traffic for those who drove to the location. A dramatic increase in turnout may exacerbate the need for [creative solutions](#) in November.

Providing Opportunities for Voters with Disabilities

Mail voting options do not meet the accessibility needs of all voters with disabilities who often rely upon accessible voting machines or curbside procedures at polling locations to vote a secret ballot. Election officials in jurisdictions that are expanding absentee or mail-in voting must ensure that in-person voting options accommodate the needs of voters with disabilities.

Lynn Bailey, Executive Director of the Board of Elections of Richmond County, Georgia emphasized the importance of ensuring the right to vote for voters with disabilities telling the EAC, “Anyone with a disability should be able to come in with relative ease to cast their ballot in an environment that’s safe and welcoming. We also try to foster that by involving members of our disability community as poll workers. And that has really helped to provide mentors, particularly during early voting, to show voters the way, if you will.”

Cambridge, Wisconsin Deputy Clerk Barbara Goeckner highlighted clear face shields during an EAC hearing as an option to assist hearing impaired voters that can normally rely upon reading poll workers lips at polling

locations. James City County, Virginia is developing a tabletop display for voters with hearing impairment to provide step-by-step instruction to ensure they can vote and communicate with poll workers. Some states are working to expand the use of electronic ballot delivery and marking tools to allow blind or visually impaired voters to vote an absentee ballot at home. For more information on electronic ballot delivery and marking, please see [Electronic Ballot Delivery and Marking](#). For information on minimizing risk within these systems, please contact CISA or the EAC.

[Personal Protective Equipment, Disinfecting Polling Locations, and Voting Supplies](#)

COVID-19 has also created new responsibilities for election officials and poll workers including acquiring personal protective equipment (PPE) (e.g., gloves and N-95 masks) and other protective equipment (e.g., other masks or face coverings), disinfecting polling locations, and distributing or disinfecting supplies used to vote.

While some states are providing protective equipment to localities, in states without a centralized distribution officials should work with others in their states, including emergency managers, to obtain equipment directly. For example, the Wisconsin Election Commission worked with the Wisconsin State Emergency Operations Center to request cleaning supplies, PPE, and additional staff. The Center was then able to work with the National Guard to obtain and distribute the supplies. States [may use CARES Act funding](#) to obtain these supplies.

Kentucky [utilized the National Guard](#) to clean and disinfect polling locations. Chicago, Illinois prioritized the use of protective equipment when designing their polling locations. Following their primary, Chicago Election Board spokesman, Jim Allen told the EAC moving forward “[w]e will have stationary plexiglass shields--like you see in convenience stores--at the table where people are exchanging information. We will offer not only masks, but see-through face shields to poll workers, something they wear like with a headband.” Green County, Missouri has recruited additional poll workers sanitize voting booths, pens, styluses, and other materials between voters. Shane Schoeller, Green County Clerk told the EAC, “You want to minimize the risk to everyone that’s there but we’re going to have to have more people there rather than less in order to serve the voter well. So, for example we’re going to have at minimum, one person who will be assigned to clean hard surfaces.”

Consider distributing tools used to vote, such as pencils or pens, to voters as a one-time use supply to minimize the need for disinfecting during voting. One county that utilized this plan was Scott County, Iowa. Poll workers distributed pencils to use to complete their ballot and to take home, allowing the county to minimize the equipment that requires sanitization between voters. Roxanna Moritz, Scott County Auditor and Commissioner of Elections compared it to the typical “I Voted” sticker stating, “We went ahead and bought pencils for everyone. So it’s going to be our ‘I Voted’ sticker. Take it with you please. Use it and take it with you and we’ll be watching to make sure no one leaves them behind.”

Localities that conducted primary elections during the COVID outbreak have spent significant portions of their budget and CARES Act funding on supplying protective equipment to voters and poll workers and acquiring equipment for voting locations. Localities must now evaluate how much of their purchased supplies are reusable, such as a plexiglass shield, and how much PPE must be replaced or purchased anew. Jared Dearing, Director of the Kentucky Board of Elections noted the difficulty of stretching COVID response budgets telling

the EAC, “some of the things that we purchased for this primary election we can reuse. We can re-purpose. But a lot of the things were one-off costs.”