



Northern
California

VIA ELECTRONIC MAIL AND ONLINE PORTAL

September 4, 2023

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RE: July 2023 Draft Revision of Election Administration Plan

Dear Yolo County Elections Office:

We write on behalf of the American Civil Liberties Union of Northern California (“ACLU NorCal” or “we/us”) regarding the Yolo County Draft Revision of Election Administration Plan, dated July 2023 (“July 2023 EAP Draft”). ACLU NorCal is committed to seeing the successful implementation of the Voter's Choice Act (VCA) across the state and ensuring that the administration of elections works for all, including voters with limited English proficiency (LEP), voters with disabilities, voters of color, low-income voters, and other underrepresented communities.

We therefore submit the following comments and suggestions to the Yolo County Elections Office (“Elections Office” or “you”) regarding the July 2023 EAP Draft. The comments track the order of the different sections of the July 2023 EAP Draft. Sections omitted in this letter do not have a comment from us.

A. Section 1: Election Administration Plan

a. Vote-by-Mail Ballots

The first sentence of this section of the July 2023 EAP Draft states that all active registered voters are mailed a ballot with a “postage-paid return identification envelope.” We infer that this is meant to refer to the “vote by mail ballot packet that includes a return envelope with instructions for the use and return of the vote by mail ballot” described in the VCA.¹ However, as written, the July 2023 EAP Draft is unclear on the meaning of “return identification envelope” and could lead some voters to mistakenly believe that your office is stating that *all* active registered voters must return a copy of their personal identification, such as a driver’s

¹ Cal. Elec. Code § 4005(a)(8)(A).

license, in order for their mailed ballot to be counted. Therefore, please clarify the language in this sentence. We do appreciate that the July 2023 EAP Draft states that voter instructions and a list of the Vote Center and Ballot Drop Box locations and hours of operation will be included alongside mailed ballots.

We further appreciate the Elections Office for going above and beyond by providing translated facsimile ballots in not only Yolo County's Section 14201 languages (Spanish, Chinese, Korean, and Punjabi), but also in Russian to support the county's large Russian population. We ask that you clarify in the EAP that vote center staff members will be trained on the purpose and proper handling of facsimile ballots, prepared to inform voters of the existence of facsimile ballots, and made aware that if a voter requests a facsimile ballot, the worker must provide it to the voter and not have the voter find it themselves.²

Next, we applaud the Elections Office for providing a description of the ballot tracking program, "Where's My Ballot?", and a link to the Ballottrax enrollment website. We also commend the Elections Office for including information in the July 2023 EAP on how to request a replacement ballot. Can the Elections Office please explain how this information about Ballottrax and replacement ballots will be a part of the outreach plan to voters?

b. Returning Voted Vote-by-Mail Ballots

We thank the Elections Office for providing information on how voters can return their voted mail ballots. To avoid confusion, we suggest rewording the last paragraph of this section to read: "The hours of operation for ballot drop boxes and vote centers **will be** ~~are~~ posted on the Yolo County Elections webpage during the election (<https://www.yoloelections.org>) and can be found in the county information guide, vote-by-mail packet, and mailer." Putting "are" in this sentence implies that the drop box and vote center locations are already on the webpage, but they are not.

We further suggest adding to this paragraph the exact date when final details about ballot drop boxes and vote centers will be added to the Election Office's website. Similarly, we suggest the Elections Office clarify when the county voter information guide and mailer will be sent out, respectively. We also strongly suggest updating Appendix B as the Elections Office finalizes vote center and ballot drop box locations for the 2024 elections and clearly stating that plan in this and other relevant sections of the EAP.

c. Remote Accessible Vote by Mail

We are glad to see a description in the July 2023 EAP Draft of how Remote Accessible

² Cal. Elec. Code § 14201(c)(1)-(2).

Vote by Mail (RAVBM) will be available to voters. We appreciate that the Elections Office included thorough and transparent information on what RAVBM is and how voters can utilize the RAVBM system. Can the Elections Office please clarify whether RAVBM will be available in all covered languages?³

d. Vote Center and Ballot Drop Box Locations

We appreciate that the Elections Office listed the factors that it is required by state law to consider in determining its vote center locations, such as proximity to public transportation routes and to specified communities.⁴ We encourage you to also consider proximity to underrepresented voter populations not expressly mentioned by the VCA, such as system-impacted voters, students and youth (i.e., proximity to college or university campuses), unhoused voters, and tribal voters.

We ask the Elections Office to also consider whether its vote centers are located at places everyone in Yolo County’s communities trusts and feels comfortable. In “Appendix B - Proposed Vote Centers and Ballot Drop Boxes” of the July 2023 EAP Draft under “Table 12 Actual November 2022 Vote Centers – Open for four days,” the Winters Vote Center is located at “Public Safety Facility - EOC Training Room” (702 W. Main Street, Winters). This location is at the Winters Police Department building. Vote center and ballot drop box locations placed in public-facing areas of sheriffs’ offices or police departments can have an intimidating impact for some voters.⁵ With this in mind, we especially urge the Elections Office to consider other vote center locations in Winters to ensure safety and comfort for these Winter voters during the upcoming 2024 Elections.

At the same time, the Elections Office can increase access to system-impacted voters who have no other in-person voting options by establishing vote centers inside local jails. For example, Los Angeles County established a vote center inside the Century Regional Detention Facility in February 2020, utilized it for the March 2020 and June 2022 primary elections, and added a second vote center inside a detention facility during the November 2022 statewide general election.⁶

³ Cal. Elec. Code § 4005(a)(5).

⁴ *Id.* § 4005(a)(10)(B).

⁵ League of Women Voters of Cal. Educ. Fund, *The Voter’s Choice Act Toolkit* (Feb. 2022), <https://docs.google.com/document/d/1LO3pedU6lW5HfEilQgHEDvvLy1hMq9tTfkIrBbpO-o/edit> (stating that even locating vote centers at city halls near police departments or having the presence of police officers nearby may disincentivize voting).

⁶ See Naila Awan, *Jail-based Polling Locations: A Way to Fight Voter Disenfranchisement*, Prison Policy Initiative (Oct. 25, 2022), https://www.prisonpolicy.org/blog/2022/10/25/jail_voting/; Naila Awan & Wanda Bertram, *Jail-Based Polling Places are Key to Expanding Ballot Access*, Law360 (Jun. 23, 2023, 3:25 PM), <https://www.law360.com/articles/1690482/jail-based-polling-places-are-key-to-expanding-ballot-access>; Assemb. Elections on A.B. 544, Assemb. 2023-24 Reg. Sess. (Cal. Apr. 17, 2023). Note that vote centers should be placed

We also ask that you consider whether the planned vote center locations are near unhoused populations. Establishing vote centers near service centers, shelters, and/or public libraries can improve access for these voters. For example, following feedback that the first VCA election in Sacramento County in 2018 was not accessible to many unhoused voters, that county added a vote center in 2020 in an area of central Sacramento with a high density of unhoused people, shelters, and service centers and committed to partnering with specific service providers to reach unhoused voters.⁷

Next, we appreciate that the list of potential vote center and ballot drop box locations is provided in Appendix B of the July 2023 EAP Draft. We suggest the Elections Office include a line in this section to direct voters to Appendix B. Finally, we also suggest that the Elections Office provide maps depicting the location of each vote center and ballot drop box.⁸

e. Vote Centers

We appreciate the Elections Office for providing information in the July 2023 EAP Draft describing what voters can expect at in-person voting locations, including that assistance will be available in languages other than English. We ask the Elections Office to specify what languages will be available to voters in this section of the EAP and specify in Appendix B in which languages assistance will be available at each vote center location.

We further appreciate the inclusion of information about how curbside voting will be offered in Yolo County. We request that the Elections Office also include where to find curbside voting locations or whether curbside voting will be available at all vote center locations and provide more detailed instructions on how to request and vote using curbside voting.

f. Vote Center Formula and Location Considerations

We appreciate that the Elections Office included information about the VCA formula for calculating the minimum requirements for the number of each kind of vote center based on the number of registered voters in the county.⁹ To ensure accuracy and consistency, we suggest you include a reference to Cal. Elec. Code Section 4005(a)(3)(A), as this is the direct citation for the language included in the first paragraph in this section of the July 2023 EAP. We also suggest that you clarify in this section why “more than 120,000 registered voters” was used as the

inside jails for voters without other options and not near sheriffs’ offices or police departments to ensure comfort and avoid intimidation for system-impacted voters.

⁷ See County of Sacramento Election Administration Plan: January 2020, <https://elections.sacounty.net/VoteCenters/Pages/Previous-Versions-Election-Administration-Plan.aspx>.

⁸ *Id.* § 4005(a)(10)(I)(vi)(V).

⁹ Cal. Elec. Code §§ 4005(a)(3)(A), 4005(a)(4), 4005(a)(10)(I)(vi)(I)

baseline to calculate the minimum number of vote centers in Table 1 on page 12.¹⁰

We also appreciate the Elections Office for referencing in this section where to find the vote center locations used in the 2022 election cycle in Appendix B. In the last line of this section, we ask the Elections Office to fix the following typos: “~~We that~~ We plan to use these locations for the next election; however, {Vote Center locations are subject to change, based on the availability of the location host.}”

g. Vote Center Accessibility for Voters with Disabilities

We appreciate that the Elections Office has included a section describing how vote centers in Yolo County will be accessible for voters with disabilities. We also commend the Elections Office for ensuring that all potential vote centers are surveyed in accordance with the California Secretary of State Polling Place Accessibility Guidelines. We are glad to see that these guidelines are also linked in the July 2023 EAP Draft.

We also appreciate that all vote centers will be equipped with accessible marking devices, as required by state and federal law, to provide voters with disabilities the ability to vote privately and independently. We further appreciate that this section of the EAP specifies that there will be three accessible ballot marking devices in each vote center.¹¹ We thank the Elections Office for going above and beyond in offering detailed descriptions in the EAP of the accessible ballot marking devices and how you will assist voters who are unable to use accessible ballot marking devices (such as curbside voters and voters who are unable to enter mobile vote centers).

h. Vote Center Days and Hours of Operation

We appreciate the Elections Office for including the general days and hours of operation for the vote centers in Yolo County. As vote center locations for 2024 are finalized, we ask the Elections Office to specify in Appendix B the hours of operation for *each* vote center and drop box location.¹²

i. Vote Center Layout

We are glad to see that the Elections Office has kept voter privacy and accessibility in mind when choosing the vote centers.¹³ We especially appreciate that you have included layouts

¹⁰ We assume that it is because this is the estimated number of registered voters in Yolo County during the 2024 election, but this is not clearly stated in the EAP.

¹¹ *Id.* § 4005(a)(2)(B)

¹² *Id.* § 4005(a)(10)(I)(vi)(VII).

¹³ *Id.* § 4005(a)(10)(I)(vi)(XI).

and floor plans of each vote center used in the 2022 Election Cycle and ask that you update these as 2024 vote centers and their layouts are finalized. In the last line of this section, we also ask the Elections Office to fix the following typos: “however, {Vote Center locations are subject to change, based on the availability of the location host.}”

j. Vote Center Staffing and Training

We applaud the Elections Office for providing details on the staffing of vote centers. We are excited to see the results of the new Election Returns Couriers innovation being piloted in the 2024 election cycle. Can the Elections Office please also specify what training the Election Returns Couriers will receive in terms of ensuring that there will be no error or disruptions when returning the ballots?

We appreciate that the Elections Office has included the anticipated number of staff that will be at each vote center type.¹⁴ We see that this plan is still in development, and we look forward to seeing the final number of poll workers for each location reflected in the EAP. We also see that the first chart on page 15 of the July 2023 EAP Draft states that there will be 10 “4-day” vote centers; however, this seems to contradict the chart on page 13, which states that there will be 13 of these vote centers. Can you please correct or clarify the reason for this discrepancy? Also, can you please confirm when you anticipate finalizing the number of total election workers?

Next, although we appreciate the Elections Office for utilizing telephonic interpreter services to provide expanded support for LEP voters, we ask that the Elections Office also add to Appendix B the number of bilingual staff and languages spoken at each vote center.¹⁵ We also ask that the Elections Office provide more detail about the content of the trainings for vote center workers. We do appreciate that the July 2023 EAP Draft states that trainings will include live instruction, hands-on training at a vote center, online videos and quizzes, and a written manual. Additionally, we suggest that the Elections Office consider staff members’ scheduling needs (e.g., holding segments of trainings after work hours and on weekends) to facilitate greater access. The Elections Office should ensure that back-up staff members also receive adequate training to avoid disenfranchising voters, and we are glad to see that the July 2023 EAP Draft states that “standby poll workers...will also have the opportunity to work a full day as a part of the hands-on training experience.”¹⁶

¹⁴ *Id.* § 4005(a)(10)(I)(vi)(IX).

¹⁵ *Id.*

¹⁶ Inadequate training and incorrect information provided to backup poll workers who were called to serve at the last minute resulted in voter disenfranchisement in Alameda County during the November 2020 election. *See* Jose Feroso, *Alameda County’s Election was Marred by Systemic Problems, Say Voting Rights Groups*, The

We commend the Elections Office for highlighting accessibility for LEP voters and voters with disabilities in the poll worker training plan. We especially appreciate the description of how poll workers will be trained to set up and use the accessible ballot-marking devices. To further ensure each vote center is accessible to voters with disabilities, could you please provide in the EAP the type and number of reasonable modifications at each vote center, if any?¹⁷

To also ensure trainings are accessible to vote center workers with disabilities, the Elections Office should consider making the layout of training spaces accessible for individuals who use mobility devices and making any training materials or presentations using large, plain font for staff members with vision impairments.

Further, we request that the Elections Office provide a specific plan for recruiting bilingual staff members. This plan should specify the time, location, and frequency of recruitment efforts. The Elections Office can also reach out to the Secretary of State for assistance in recruitment of bilingual vote center workers. Lastly, can you please confirm whether you will conduct any recruitment efforts at community events and whether bilingual staff members will receive compensation for their additional language skills?

k. Election Technology at Vote Centers

We commend the Elections Office for providing information on the various types of election technology used at vote centers, such as accessible ballot-marking devices and electronic pollbooks. We appreciate that the Elections Office included information on how vote center staff will be trained on the accessible ballot-marking devices. Can the Elections Office also confirm that vote center staff and standby poll workers will be trained to use the electronic pollbooks, including the content of this training?

l. Mobile Vote Center

We appreciate the Elections Office for implementing Mobile Vote Centers in Yolo County. To avoid confusion, we suggest rewording the last paragraph of this section to read: “The details of the Mobile Vote Center location and exact times of operations **will be** ~~are~~ posted in the county information guide, vote-by-mail packet, and mailer, and posted on the Yolo County Elections webpage during the election (<https://www.yoloelections.org>).” Putting “are” in this sentence implies that the mobile vote center locations and operation times are already on the webpage, but they are not. Replacing ‘are’ with ‘will be’ will offer a clearer direction as to when the locations will be posted.

Oaklandside (Nov. 18, 2020), <https://oaklandside.org/2020/11/18/alameda-countys-election-was-marred-by-systemic-problems-say-voting-rights-groups/>.

¹⁷ Cal. Elec. Code § 4005(a)(10)(I)(vi)(X).

We further suggest adding to this paragraph the exact date when final details about the mobile vote center locations and operation times will be added to the Election Office’s website. We also strongly suggest updating Appendix B as the Elections Office finalizes mobile vote center locations and operation times for the 2024 elections and clearly stating that plan in this and other relevant sections of the EAP.

m. Official Ballot Drop Boxes

We appreciate that the Elections Office included information about the VCA formula for calculating the minimum requirements for the number of ballot drop boxes based on the number of registered voters in the county. We appreciate the Elections Office for going above and beyond the minimum requirement of nine ballot drop boxes and instead providing 16 ballot drop boxes. We also suggest that you clarify in this section why “more than 120,000 registered voters” was used as the baseline to calculate the minimum number of ballot drop boxes in Table 4 on page 17.

n. Ballot Drop Box Days and Hours of Operation

We are glad to see that there will be at least one exterior ballot drop box location that is accessible, secured and available for a minimum of 12 hours per day including regular business hours.¹⁸ We ask that the Elections Office also further promote accessibility by keeping at least one drop box open to the public 24/7. We also suggest that the Elections Office specify in Appendix B whether each drop box location is inside or outside.¹⁹

o. Ballot Drop Box Retrieval Teams

We appreciate the description in the July 2023 EAP Draft of what the ballot drop box retrieval teams will be doing on Election Day. Can the Elections Office please also specify what the required online and in-person trainings will entail for each Ballot Drop Box Retrieval Team member?

p. Language Accessibility and Assistance

We are glad that the Elections Office highlighted the availability of language assistance at vote centers during the early voting period as well as on Election Day. Although we appreciate the Elections Office’s commitment to reaching out to voters who have requested language assistance on their voter registration forms, we ask that the Elections Office also include a detailed outreach plan for reaching all LEP voters in Yolo County, including those who may need to update their language preference on their voter registration record.

¹⁸ *Id.* § 4005(a)(1)(B)

¹⁹ *Id.* § 4005(a)(10)(I)(vi)(IV).

Additionally, there is an extra period (.) before the last line in this section that appears to be a typo.

q. Language Assistance for Vote-by-Mail Voters

As stated above, we appreciate that the Elections Office will provide facsimile ballots in all of Yolo County's section 14201 languages and in Russian. Can the Elections Office also confirm whether and how it plans to conduct outreach to LEP voters to inform them of the existence of these facsimile ballots and how to access them on the Yolo County elections website?

r. Language Assistance for In-Person Voters

We appreciate that the July 2023 EAP Draft states that facsimile ballots will be available "at or near each Vote Center's check-in stations." Can you please provide more specific information about how the facsimile ballots will be "displayed and labeled"?

Also, since the accessible ballot-marking devices in Yolo County do not present information in any languages other than English, what additional measures is the Elections Office taking to assist LEP voters who may have disabilities requiring an accessible ballot-marking device?

Additionally, as requested above, can the Elections Office please specify the recruitment plan to retain bilingual poll workers?

s. Security and Contingency Plans – Continuance of Operations in the Event of a Disruption

We appreciate the Elections Office's description Yolo County's security goals, details on the security measures at vote centers, disruption prevention measures, and plans for continuance of operations in the event of a disruption.²⁰ We also appreciate that the Elections Office included its Emergency Response Plan from 2022 and Memorandum of Understanding with Solano County as appendices. We ask that the Emergency Response Plan be updated with the 2024 version when it is finalized.

We are also glad to see that vote center staff members will receive training in maintaining the security of voting equipment, using ePollbook software to access the voter registration and election management system, and responding to potential interpersonal disruptions. We request that the Elections Office also offer training on how to respond to natural disasters and emergency situations.

²⁰ *Id.* § 4005(a)(10)(K)(VIII)

t. Fiscal Impact and Cost Comparisons

We appreciate the Elections Office for including the cost comparisons for the 2020 elections and the 2022 elections to further indicate the short-term and long-term costs and savings from the adoption of the VCA.²¹ We ask that the Elections Office also include the anticipated budget for the 2024 elections.

u. Outreach Expenses

As in the previous section, we appreciate the Elections Office for including the cost comparisons for outreach expenses during the 2020 elections and the 2022 elections to further indicate the short-term and long-term costs and savings from the adoption of the VCA. We ask that the Elections Office also include the anticipated outreach budget for the 2024 elections.

B. Section 2: Voter Education and Outreach Plan

a. Overview and General Requirements

We appreciate the Elections Office for giving an overview of its voter education and outreach plan. We especially applaud the Elections Office's collaboration with a great number of community organizations found in Appendix E. With accessibility in mind, we suggest that the Elections Office alphabetize this list of community organizations. We also appreciate the inclusion of the Elections Office's media partners list in Appendix F.

In addition to the outreach topics listed in this section of the July 2023 EAP Draft, we urge the Elections Office to consider also conducting outreach to voters to update their language and party preferences and to inform voters about same-day voter registration, early voting, and signing up with BallotTrax to track their mailed ballots.

Finally, we urge the Elections Office to further expand its voter education and outreach plans to reach system-impacted voters, unhoused voters, and tribal voters. We would appreciate it if the Elections Office provided more details on education and outreach efforts to these underserved communities moving forward.

b. Community Presence

We appreciate the Elections Office for providing samples of flyers inviting the public to the county's public consultation meetings as well as including a sample of a high school voter registration drive. Although this section implies the county's involvement by participating in existing events, only one example of such involvement is listed in the appendix referenced

²¹ *Id.* § 4005(a)(10)(I)(v).

(Appendix E). We suggest that the Elections Office provide more details on events it plans to participate in for the upcoming 2024 elections. We also request that the Elections Office provide more information on any and all of its outreach plans to various community organizations and community partners for the 2024 elections.

c. Digital Accessibility

We commend the Elections Office’s efforts in ensuring digital accessibility. We do appreciate that the Elections Office has accessibility in mind when creating election materials. We also appreciate that the website has been designed with accessibility guidelines in mind. Can you please clarify if all voting materials will be available in accessible formats as required by the Americans with Disabilities Act of 1990 and the Rehabilitation Act of 1973?²² Can the Elections Office also clarify if it will ensure that all election information is available in an accessible, text-based format on the website? We also suggest that the Elections Office include clear and transparent directions for how to find the accessible information on the website.

We further applaud the Elections Office for making information about the VCA and its implementation clear and easy to find on its website. We appreciate that the website contains information and links regarding the VCA and the July 2023 EAP Draft. We are glad that the Elections Office hosts recurring Language Accessibility Advisory Committee (LAAC) and Voting Accessibility Advisory Committee (VAAC) meetings. We request that the dates and details for joining the upcoming meetings be clearly stated on the website, along with a timeline for the VCA implementation steps.

Regarding the Yolo County Elections website language accessibility, there is no mechanism on the website for the public to translate the webpage. The lack of translations on the website deprives LEP voters of critical election information and election materials. At a minimum, we encourage the Elections Office to include a mechanism on its website to allow LEP voters to translate the page. The public increasingly relies on election websites for their election-related information, from finding voting locations to obtaining voter registration information. We also urge the Elections Office to use human translations for election materials wherever possible.

We applaud the Elections Office for also providing translated files of the July 2023 EAP Draft²³ on its VCA webpage. This allows for LEP communities to participate in the EAP development process, which is consistent with the VCA’s goal of “accommodating non-English proficient voters . . . as well as requiring extensive community involvement and voter

²² *Id.* § 4005(a)(8)(C).

²³ *Id.* § 4005(a)(10)(E)(iii).

education.”²⁴ We encourage the Elections Office to also translate other linked files (e.g. past meeting minutes, poll worker applications, etc.) into Spanish, Chinese, Korean, Punjabi and Russian and to upload these translated versions (or at minimum, to place the content of these files in text form on the website itself and include a translation mechanism on the website as described above).

d. Individual Voter Network

In the first sentence, there is a minor typo: “Individual voters may participate in s enhancing outreach efforts by...”

e. Education and Outreach with Language Minority Communities

Thank you for including a distinct section on voter education and outreach for bilingual and non-English language voters. We appreciate these opportunities for public participation and look forward to continuing to participate in LAAC meetings to learn more about your accessibility plans.

We appreciate that the Elections Office will conduct a general mailing to all registered voters to inform them of how they can request a translated facsimile ballot in alternate languages required by section 14201. In addition to this general mailing, can the Elections Office elaborate on how it plans to conduct outreach to language minority communities specifically? We recommend that you provide more specificity on the content and timing of your voter education and outreach for language minority communities. Can you also please state what information you will highlight in your outreach and when you will conduct the outreach for these communities? We suggest providing a more in-depth media plan in reaching language minority voters.

We further applaud the Elections Office for holding Voter Education Workshops in each required section 14201 language. We request that the Elections Office specify how it plans to inform the community of these events and identify when they will be held.

f. Education and Outreach with Disability Communities

Thank you for including a distinct section on voter education and outreach for voters with disabilities. We appreciate these opportunities for public participation and look forward to continuing to participate in VAAC meetings to learn more about your accessibility plans.

Please include a specific outreach plan with information on the content and timing of your voter education and outreach for voters with disabilities. We do appreciate the inclusion of your plans to share information with the disability community about the Vote Center model and

²⁴ S. Floor Analyses on S.B. 450, S. 2015-16 Reg. Sess. (Cal. Aug. 25, 2016).

voting options, including RAVBM.

We also appreciate your office's voter education workshop that will help to increase accessibility and participation of eligible voters with disabilities. We request that the Elections Office specify how it plans to conduct outreach for this voter education workshop and specify the content and timing of the workshop.

g. Direct Voter Contacts

We appreciate the Elections Office's inclusion of its plans to send out two direct mailers, as required by the VCA, in addition to sending the County Voter Information Guide and the vote-by-mail ballot package. We also appreciate that these mailers will include information to advise voters of the availability of the toll-free voter assistance hotline and the important details and deadlines pertaining to the specific election. We ask that the Elections Office explicitly state in its voter outreach content that the voter assistance hotline: (1) will operate for at least 29 days before the election; (2) is accessible to voters with hearing disabilities; and (3) is capable of providing assistance to voters in Chinese, Korean, Punjabi, and Spanish.²⁵ Finally, we request that the Elections Office specify when each direct contact will be conducted.

h. Indirect Voter Contacts

We appreciate the Elections Office's plan for at least one public service announcement (PSA) to provide information on the upcoming election and promote the toll-free voter assistance line.²⁶ Can the Elections Office clarify how it plans to use this PSA to reach language minority communities? We also ask that the Elections Office describe its plan for this PSA to be accessible for voters who are deaf or hard of hearing and for voters who are blind or visually impaired.²⁷

We further appreciate the Elections Office for utilizing different media outlets and methods of outreach to promote voter education in Yolo County. We ask the Elections Office to specify when each of these methods will be utilized. We also ask that the Elections Office specify when it will conduct various media outreach activities and what information will be highlighted in each media activity and PSA.

Thank you for your attention and the opportunity to provide suggestions for further improvement of your office's EAP. We look forward to seeing Yolo County continue its VCA implementation and to successful administration of the 2024 elections. If you have any questions

²⁵ Cal. Elec. Code § 4005(a)(10)(I)(vii).

²⁶ *Id.* § 4005(a)(10)(I)(i)(IX).

²⁷ *Id.* § 4005(a)(10)(I)(i)(VIII).

regarding the comments in this letter, please do not hesitate to reach out.

Sincerely,

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