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**VOTING IN AMERICA:
THE POTENTIAL FOR POLLING PLACE QUALITY AND RESTRICTIONS ON
OPPORTUNITIES TO VOTE TO INTERFERE WITH FREE AND FAIR ACCESS TO THE
BALLOT**

**THE COMMITTEE ON HOUSE ADMINISTRATION
U.S. HOUSE OF REPRESENTATIVES**

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Thank you, Chairperson Butterfield, Ranking Member Steil, and members of the Committee for allowing me to speak before you today. The conversation before the Committee today is vitally important. Free and fair access to the ballot is essential to a functioning and enduring democracy.

Free and fair access ensures that all eligible voters can vote and be confident that their votes count. It means that citizens recognize the election as free and fair and therefore accept the results of an election no matter which candidate wins. Safeguards that protect the freedom and fairness of the entire election process give the American people that confidence in the election results. I am excited to address the Committee today on these important issues.

My name is Ashlee Titus. I am an attorney at Bell, McAndrews, & Hiltachk in Sacramento, California specializing in campaign finance and election law. As part of my election law practice, I organize lawyers to observe elections in California and have been an observer myself in several California counties over the last 17 years.

I also serve as the Secretary and on the Board of Directors for Lawyers Democracy Fund, a non-profit, nonpartisan organization dedicated to promoting the role of ethics and legal professionalism in the electoral process. LDF's research focuses on in the effectiveness of current election methods, and in particular on voter confidence.

As this committee explores the intersection of ballot access and election security, it is vital to keep in mind the current crisis in voter confidence. The Pew Research Center reported that an astonishing 41% of voters say the November election was not run well.¹ In a poll conducted by the California Institute of Technology, 39% of respondents nationwide did not have confidence in the 2020 election results.²

There are many threats to election integrity that have led to the current crisis in voter confidence. Errors by election administrators, lack of transparency, and rapidly changing laws and rules were some of the problems in 2020. It is vital for basic due process, fairness, and increased voter confidence that election procedures be well settled in advance of the election and provided to the public through the Internet and other easily accessible means. This allows voters, election administrators, observers, the media, and the general public to know what the rules are, and assists election administrators in running the election smoothly and fairly.

When rules change frequently or are not publicly disclosed, the outcome is voter suppression and lack of confidence. When people do not know what the rules of the game are, they are less likely to participate. Further, election officials do not have time to understand and correctly implement the rules in their election procedures, leading to errors. Administrators at times, whether through being overworked or an instinct to protect the process through secrecy, can obstruct observers, fail to disclose the procedures for voting, or not meet required deadlines for reporting information. When there is confusion or lack of transparency in the voting process, parties and candidates resort to the courts, which inevitably creates more chaos and distrust in the system.

Therefore, it is essential that the rules for an election be established and published before any ballots are sent out and that elections be open to meaningful observation as a baseline for increasing voter confidence in election processes and results. These baseline requirements of due process, transparency, and good election administration should be uncontroversial.

But beyond that, it is crucial that the rules themselves promote confidence instead of undermining it. While the ballot box must be accessible to all eligible voters, when election changes are implemented at the expense of important election integrity safeguards, voter confidence is greatly undermined. In the past few years, states have begun to take voter confidence more seriously by implementing laws that secure elections to a greater degree.

The clearest example of a popular reform that increases voter confidence is voter identification laws. Voter ID laws are a commonsense election integrity safeguard that are widely supported by voters both sides of the aisle. Recent studies place the support of voter ID laws at 75% among likely U.S. voters.³ Broken down, 89% of Republicans, 60% of Democrats, 77% of unaffiliated voters nationwide believe voters should be required to show photo identification such as a driver's license before being allowed to vote, including 69% of black and 82% of other minority voters.⁴

These polls come almost two decades after the bipartisan Commission on Federal Election Reform, commonly called the Carter-Baker Commission, in its report titled "Building Confidence in U.S. Elections" expressed how voter ID boosts confidence as an election safeguard:

"Americans are losing confidence in the fairness of elections...The electoral system cannot inspire public confidence if no safeguards exist to deter and detect fraud or to confirm the identity of voters. Photo IDs currently are needed to board a plane, enter Federal buildings, and cash a check. Voting is equally important."⁵

Voter ID is widely supported by voters and ordinary citizens outside the Beltway who find this reform uncontroversial because they understand its importance as an election safeguard. LDF's research on voter ID laws underscores the important role they play in improving voter confidence and promoting integrity.⁶ The National Conference of State Legislatures states that 35 states have active laws requiring voters to present adequate identification at the polls, 18 of which ask for the voter to present photo ID.⁷ This is a growing trend, not a shrinking one, and for good reason – voters support these laws for how they increase voter confidence in the security of elections.

When voters choose to vote outside the polling place by absentee or mail ballot, they should receive the same protections as voters who choose to vote at a polling place. That is basic fairness. For this reason, states are increasing the security of their absentee ballot verification procedures. Florida just enacted SB 90, which requires voters to provide their driver's license number, state ID number, or the last four digits of their social security number to verify their absentee ballots and applications.⁸ Georgia's recent election reform, SB 202, requires voters to submit a photo ID along with their absentee ballot or to verify their identity by providing their ID number or the last four digits of their Social Security number.⁹

Many argue these laws suppress voters, but if voters who choose to vote in person on Election Day are protected by an identification requirement in a majority of states, why should voters who vote by mail not receive the same protection for their votes?

Ballot verification laws are beginning to move away from verifying absentee ballots by signature because the methods for doing so often lead to the subjective judgment of election workers disenfranchising eligible voters. States are instead implementing photo ID and other identification requirements for mail voting because it serves as an objective method to verify ballots, protect voters from having their ballots compromised, and increase voter confidence without disenfranchising voters or reducing ballot access.

Safeguards like voter ID laws are invaluable to the people's trust in our democratic process.

It is safe to say that my home state of California has perhaps the loosest election laws in the nation. California conducts its elections overwhelmingly by mail, struggles to maintain current and accurate voting rolls, has an extended early voting period, permits unlimited third-party ballot collection, allows mail ballots to be returned to unmonitored drop boxes at any time through Election Day, permits ballots postmarked by Election Day to be counted so long as they are received within three days after the election, has automatic and same-day voter registration, and many other election procedures designed to make voting more accessible.

Most of California's election rules are embodied in H.R. 1, the For the People Act, which if passed would override the effective election laws of most every state. Yet, in spite of this openness designed to optimize opportunities to vote even at the expense of the integrity of elections, California's voter turnout in 2020 was average compared to other states across the country.¹⁰ There comes a point where expanding ballot access actually fails to increase voter turnout and ends up only changing when existing voters cast their ballots, with the unintended effect of undermining voter's confidence in the entire system.¹¹

For example, early voting is an extremely popular election reform intended to expand voter access and increase voter turnout. However, there have been multiple studies showing it can actually decrease voter turnout.

While acknowledging early voting has become the most popular election reform in recent years, the American Journal of Political Science published a study in 2013 showing that early voting is

actually associated with lower turnout when it is implemented by itself, largely due to how it reduces the civic significance of elections for individuals and alters the incentives for political campaigns to invest in mobilization.¹²

The study's analysis noted how this decrease in turnout "upends the conventional view that anything that makes voting easier will raise turnout."¹³ The researchers in the study in the end found that early voting appears to "lower the likelihood of turnout by three to four percentage points" compared with the probability in 15 states that do not allow early voting or had not implemented other voting reforms.¹⁴

Conclusions from another study focusing on early voting in Ohio found:

"While early in-person voting and no-excuse absentee voting in Ohio reduced waiting times on Election Day, it has had no measurable impact on increasing voter turnout."¹⁵

"In 2004, when [Ohio] only had one day of voting and [excuse absentee voting], [Ohio] had more votes than [it] did in 2012 and 2016 where [it] had expansive early voting. In fact, the only time [voter turnout] increased was in 2008 and it was less than one percent."¹⁶

The Washington Post admitted in 2016 that "[t]he percentage of those who can vote and do, though, doesn't seem to be affected by early voting — at least nationally."¹⁷

What is instead affected by early voting reforms is the cost to run a campaign, since more funds are needed to sustain get-out-the-vote efforts over a longer period of time, leading to even more money in politics. The down-the-ballot contests – water commissions, school boards, judges, ballot measures, etc. – cannot afford to mobilize voters over a four-week early voting period. Early voting seems to benefit high-profile races like president and governor where voters are exposed to information over a longer period of time, but is a detriment for local races that have a greater impact on the day-to-day lives of voters and yet may not be known to voters during the early voting time frame.

Not only do laws aimed at increasing opportunities to vote often fail to increase voter turnout, when they are enacted without proper safeguards, they risk undermining the entire electoral system they are trying to improve.

Consider reforms allowing for third-party ballot collection, also known as ballot harvesting or ballot trafficking. This is where individuals and political operatives collect and return any number of voters' absentee mail ballots, either on a volunteer or paid basis.¹⁸

This Committee's minority issued a disturbing report on the negative effects ballot harvesting had on California's and North Carolina's 2018 midterm elections.¹⁹ The report labeled the practice as "potentially the greatest threat to ballot integrity in this country,"²⁰ and when considering the fact that the Supreme Court is, at any moment, set to issue a decision in *Brnovich v. Democratic National Committee* – a case dealing with the validity of Arizona's law that makes ballot harvesting a felony – it reveals just how important of an issue ballot harvesting currently is.

Supporters of ballot harvesting often suggest it is needed to allow a family member to return other household members' ballots or a caregiver to return a housebound senior citizen's ballot. These are important considerations for states when crafting their ballot return rules, and they should be flexible enough to allow ballots to be returned by others in reasonable, limited circumstances consistent with everyday life. But there is a world of difference between that and

unlimited ballot harvesting, which opens the door to voter coercion, vote buying, and other abuses.

California enacted unlimited ballot harvesting in 2016.²¹ The law has since had a dramatic effect on how elections are run in California, demonstrating how such laws can undermine election integrity and voter confidence. Unlimited ballot harvesting can allow paid political operatives to recruit and pressure voters to vote by mail at the behest of campaigns, unions, and special interest groups.²² Harvesters can influence voters to cast their ballot a particular way and in doing so undermine the secrecy of the ballot box, a long-held essential principle of American elections intended to protect voters.²³

This Committee's report explained how these laws allow unscrupulous ballot harvesters to collect, intercept and destroy mail-in ballots of voters who traditionally vote against the harvester's preferred party.²⁴

Many argue that never happens, yet North Carolina's 9th Congressional District race in 2018 shows otherwise. After reports surfaced of a Republican political operative tampering with absentee ballots, the State Board of Elections took note of the numerous irregularities in ballot return figures and ultimately refused to certify the election.²⁵

As this Committee's minority reported, "The [NCSBE] found that [the operative] and his staff illegally collected absentee ballots for his candidate, discarded absentee ballots, were witnesses to hundreds of absentee ballots, accused of attempting to submit unsealed and unmarked ballots, and directed his associates to avoid collecting ballots in African-American neighborhoods."²⁶

The sad reality is that those at most risk from coercion or disenfranchisement by an unscrupulous ballot harvester, enabled by unlimited ballot harvesting, are the most vulnerable in our society.²⁷

But even if states put meaningful limitations on ballot harvesting to ensure integrity, allowing 24-hour, unmonitored drop boxes that voters can use to return their absentee ballots makes these limitations nothing more than words on paper. According to the National Conference of State Legislatures, only around a dozen states permit voters to return absentee ballots by designated drop boxes, each offering varying degrees of security.²⁸

Not only do unmonitored drop boxes create de facto unlimited ballot harvesting, they also present a genuine risk to the security of every voter's ballot deposited in a box. Drop boxes need extensive physical security protections to prevent ballots being destroyed or lost. There were numerous reports in 2020 of U.S.P.S. drop boxes being vandalized, and at least one unattended ballot drop box was intentionally set on fire, leaving voters to question whether their returned ballots had been destroyed.²⁹ Errors by election administrators can also jeopardize the security of ballots returned via drop boxes, such as when they leave ballots behind or even leave the keys to the drop box in the lock.³⁰

Both for the actual security and perceived security of an election, any methods of returning a ballot should be overseen by election officials and have substantial physical security protections. Without adequate protections, individuals intending to take advantage of the system will do just that. For example, the Nevada Secretary of State is currently investigating the Nevada Native Vote Project for entering voters into raffles to win gift cards and jewelry allegedly for returning their mail ballots in the 2020 election.³¹ A lack of proper election safeguards around ballot return methods can lead to problems like this.

It is no wonder voter confidence was so low after the 2020 election. When laws intended to expand voter access fail to implement sufficient integrity safeguards, the result is decreased voter

confidence. Attempts to overturn state laws, like H.R. 1's For the People Act, would implement these poorly safeguarded procedures across all 50 states and only exacerbate a real problem. And these changes unfortunately do not actually do what they are enacted to do – increase voter participation.

According to a report released by the *Wall Street Journal*, three of the top five states with the largest black-white voting gaps provide voters with same-day registration – Wisconsin, Iowa, and Colorado.³² While California has some of the most open ballot access laws in the country, it still had lower turnout among all minority groups and larger voting disparities with whites than Arizona, which has laws some claim suppress minority voters.³³

Automatic voter registration has the same result – undermining voter confidence without demonstrating increased voter turnout. While the number of registered voters may increase, there is little proof that voters will participate upon being automatically registered. Add on the risk of automatic voter registration increasing voter registration record errors, instead of improving voter roll accuracy as it is supposed to, and the security and efficiency of election administration is greatly undermined. In the first few months of California's automatic voter registration program, over 100,000 errors were created in the voter rolls, including errors entered in existing voters' records that the voters were required to correct and ineligible persons being registered to vote without their permission.³⁴

Even President Obama's bipartisan Presidential Commission on Election Administration asserted that accurate voter rolls are "essential to the management of elections" for how they benefit "the ability of people to vote, of election offices to detect problems, and of courts and others monitoring elections to detect election fraud or irregularities."³⁵

Furthermore, "[a] list with many incorrect records can slow down the processing of voters at polling places resulting in longer lines."³⁶ Automatic voter registration ostensibly helps improve the accuracy of voter registration lists, but it does not always fulfill its promise. Another unintended consequence of automatic voter registration that can contribute to long lines at the polls is that it prevents election officials from using the voter rolls to effectively allocate voting equipment based on the number of active participating voters. There is simply no way to know how many voters will actually show up to vote when people who never have any intention of voting are added to the voter rolls.

When states like California have at times had more than 5 million inactive voters who have moved away or died on their voting rolls, it is no wonder there are significant election administration issues coupled with decreased voter confidence.³⁷ When California and other states decided to mail a ballot to every voter in 2020, outdated voter rolls were used to mail thousands of ballots to people who were no longer eligible to vote. Social media posts circulated about people receiving live ballots for a long-dead grandmother or seven prior occupants of their house because the state chose to mail ballots before cleaning up the rolls. This is yet another way that voter confidence is undermined.

Contrary to the narrative of those advocating for radical election changes in efforts to expand voter access, the lack of voter confidence is not coming from voters not having enough options to vote. A report by the Bipartisan Policy Center/Morning Consult found that 80% of voters were satisfied with their voting options in 2020 with 55% of all voters being very satisfied.³⁸ Even with more voters voting by mail in 2020 than any election prior, 39% of voters still prefer to vote in-person on Election Day compared to 24% of voters who prefer to vote by mail or just 12% of voters who preferred voting by mail via a ballot drop box.³⁹

Evidence suggests that voters would participate more if they were more confident that their ballots would be properly counted and not diluted by votes cast by ineligible voters. The problem is not a lack of ballot access; it is a lack of voter confidence.

The Knight Foundation's breakthrough study released in February of 2020 makes this clear:

“Many non-voters suffer from a lack of faith in the election system...Thirty-eight percent of non-voters are not confident that elections represent the will of the people, and non-voters are more likely to say that this is because the system is rigged. Non-voters are less likely to believe votes are counted fully and accurately.”⁴⁰

Voter confidence is the real issue at hand, and the only way to remedy it is to implement and maintain effective ballot integrity safeguards that ensure fears over poorly administered elections go unrealized.

What is the solution? Let the states serve as laboratories of democracy as they are supposed to. California can have its rules, Wisconsin can have its rules, North Carolina can have its rules, and Illinois can have its rules, and they can each determine how to best run a free and fair election for their citizens. With respect, Congress should not decide to impose California's rules on the entire country.

Each state should be free to implement the appropriate election methods that serve the diverse needs of its electorate, coupling procedures that make voting more accessible with safeguards that protect the integrity of the process. No state needs to look the same – one state could restrict ballot harvesting while providing mobile voting units to rural voters, another could expand mail voting while providing strong chain of custody laws and monitored drop boxes. Having a one-size-fits-all approach to elections may have unforeseen consequences, inevitably stifling innovation and tying the hands of states seeking to best serve their electorate.

Giving the federal government more control over state elections would only result in the federal government eliminating the important election safeguards thoughtfully implemented by states across the country that in turn increase voter confidence in the integrity of election results. Instead of solving the crisis of voter confidence, shifting control from the states to the federal government would only exacerbate it.

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² *Voter Confidence and Perceptions of Election Fraud in the 2020 Presidential Election*, California Institute of Technology (Nov. 23, 2020), available at: <https://electionupdates.caltech.edu/2020/11/23/voter-confidence-and-perceptions-of-election-fraud-in-the-2020-presidential-election/>.

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⁹ Senate Bill 202 As Passed, Georgia General Assembly (Mar. 25, 2021), *available at*: <https://www.legis.ga.gov/legislation/59827>.

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¹⁵ Mike Dawson, *Has early voting and no-excuse absentee voting in Ohio increased voter turnout in Presidential Elections?*, Ohio Election Results (Dec. 27, 2019), *available at*: <http://ohioelectionresults.com/documents/Miscellaneous/The%20Impact%20of%20Ohio%20Early%20Voting%202008-2016.pdf>.

¹⁶ Jo Ingles, *Early Voting in Ohio Was Up This Year, But Not Because of Reforms*, WKSU (Dec. 28, 2016), *available at*: <https://www.wksu.org/government-politics/2016-12-28/early-voting-in-ohio-was-up-this-year-but-not-because-of-reforms#stream/0>.

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²² *Political Weaponization Of Ballot Harvesting In California*, Committee on House Administration at 2.

²³ *Id.*

²⁴ *Id.*

²⁵ *Id.*

²⁶ *Id.*

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³⁷ Susan Crabtree, *Calif. Begins Removing 5 Million Inactive Voters on Its Rolls*, Real Clear Politics (June 20, 2019), available at: https://www.realclearpolitics.com/articles/2019/06/20/calif_begins_removing_5_million_inactive_voters_on_its_rolls__140602.html.

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⁴⁰ *The 100 Million Project*, The Knight Foundation (Feb. 18, 2020), available at: <https://knightfoundation.org/reports/the-100-million-project/>.