

REPORT Military Ballot Tracking Pilot Research Submitted to Congress

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Submitted by the Department of Defense (DoD)

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Executive Summary

The Federal Voting Assistance Program (FVAP) submits this report in response to the following:

(1) Section 580D of the NDAA for Fiscal Year (FY) 2020, requiring the Director of FVAP to conduct a study on the feasibility of a pilot program providing full ballot tracking of overseas military absentee ballots through the mail stream and provide a report including:

a) an estimate of the costs and requirements needed to conduct the pilot program;

Total funding consists of postage costs for mailpieces/packages consisting of at least four tests to 1,500 participants (i.e., Voting Assistance Officer (VAO)) at an estimated cost not to exceed \$300,000. This estimate is based on the conduct of approximately four full testing efforts for delivery to and return of materials from overseas personnel and associated administrative costs incurred during pilot program implementation.

b) a description of the organizations that would provide substantial support for the pilot program;

The Council of State Governments (CSG) is the lead sponsor and project management source providing project management, financial, and administrative support to election officials. The Federal Voting Assistance Program is acting as the lead federal facilitator for project and overall government sponsor for cooperative agreement with CSG and the primary researcher for post-pilot data and findings. The United States Postal Service (USPS) is providing key technical assets for guidance and technical support for setup and configuration of the project. The Military Postal Service Agency (MPSA) is also providing key technical assets for guidance with the Military Postal System (MPS) and standardized guidance to MPS personnel on scanning MBTP mail pieces. Finally, local election officials are the key implementers of program specifications, preparing official ballot packages with assigned barcodes for outbound and returning ballot envelopes.

c) a time line for the phased implementation of the pilot program to all military personnel actively serving overseas;

FVAP is conducting a series of tests to support greater implementation and ballot tracking in time for the 2022 general election with the least amount of disruption to business operations of the State Department, state and local election officials, the USPS, and the MPSA.

d) a method to determine under the pilot program if a ballot was counted, and a way to provide such information to the member of the Armed Forces casting the vote; and

The MBTP provided voters information as to the location of their blank ballot from the election office to the voter, and then the voted ballot up to its delivery at the election

office. Election officials would relay information upon request directly to the voter as to the ultimate disposition of the voted ballot.

e) a description of the efforts being undertaken to ensure a reliable and secure military ballot tracking system.

Federal agencies, state agencies, and national election organizations are partners in carrying out their roles and responsibilities in securing election infrastructure. The community of election infrastructure stakeholders consider security when designing and implementing any direct or supporting election systems. Any military ballot tracking system would not change the overall security profile already administered by USPS and MPSA.

(2) Senate Armed Services Committee Report 116-48 on S. 1790 the National Defense Authorization Act (NDAA) for FY 2020 (Reported Jun 11, 2019) requests the Director of FVAP to provide a report on a possible expansion of the Military Ballot Tracking Pilot (MBTP) to include:

a) The scope and cost of the expanded program;

Total funding consists of postage costs for mailpieces/packages consisting of at least four tests to 1,500 participants (i.e., VAO) at an estimated cost not to exceed \$300,000. This estimate is based on the conduct of approximately four full testing efforts for delivery to and return of materials from overseas personnel and associated administrative costs incurred during pilot program implementation.

b) The projected cost of extending this program to all eligible voters under the Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA) (Public Law 99–410);

The 2016 MBTP consisted of approximately 1,500 ballots. The Departments current MBTP consists of the equivalent level of volume and at least four rounds of testing leveraging participants from Voting Assistance Officers serving at overseas military installations or various U.S. Embassies and Consulates.

Total funding for initial testing to consists of postage costs for mailpieces/packages consisting of at least four tests to 1,500 participants (i.e., VAO) at an estimated cost not to exceed \$300,000.

It should be noted these tests and long term implementation will be constrained by two key factors: the voluntary nature of state and local election officials to offer ballot tracking services in absence of a federal mandate; and the limited ability to require other countries to perform scanning of international mail pieces within the structure of the Universal Postal Union (UPU).

c) The organizations that provided the FVAP substantial support in conducting the pilot, a description of the support, and costs associated with that support; and

The Council of State Governments (CSG) was the lead sponsor and project management source providing project management, financial, and administrative support to election officials. The Federal Voting Assistance Program acted as the lead federal facilitator for project and overall government sponsor for cooperative agreement with CSG and the primary researcher for post-pilot data and findings. The United States Postal Service (USPS) provided key technical assets for guidance and technical support for setup and configuration of the project. The Military Postal Service Agency (MPSA) also provided key technical assets for guidance with the Military Postal System (MPS) and standardized guidance to MPS personnel on scanning MBTP mail pieces. Finally, local election officials were the key implementers of program specifications, preparing official ballot packages with assigned barcodes for outbound and returning ballot envelopes.

d) Recommendations on the process and steps necessary to expand the program to all eligible overseas members and their families.

The 2016 MBTP was the first of its kind to provide full life-cycle tracking of ballots throughout the USPS-MPS network. It increased customer service for voters and provided valuable research data to help identify areas for improvement on both a federal and local level.

FVAP will conduct a series of tests to support the use of existing USPS barcode technology or similar barcodes, for election officials to voluntarily use and enable comprehensive ballot tracking for ballots mailed to the military, their families, and overseas citizens. FVAP will conduct a series of testing to support greater implementation and ballot tracking in time for the 2022 general election with the least amount of disruption to business operations of the State Department, state and local election officials, the USPS, and the MPSA.

In response to the FY20 NDAA requirements, FVAP will conduct an additional pilot program consisting of a series of procedural and technical tests that closely replicate the level of effort conducted in 2016, but conducted outside an election event. These tests will look for opportunities to support greater ballot tracking visibility for the 2022 general election.

These tests will leverage a control group of voting assistance officers (VAO), U.S. State Department officials, and local election officials (LEOs). FVAP's current cooperative agreement with the Council of State Governments (CSG), a region-based forum that fosters the exchange of insights and ideas to help state officials shape public policy, represents the most flexible path to bring together state and LEOs to assist, but to also reimburse these jurisdictions directly with any postage or administrative costs associated with the conduct of the pilot program. FVAP will work with the Council of State Government to implement these testing procedures and prepare a final report to discuss results and recommendations.

Additionally, it should be noted these tests and long-term implementation will be constrained by two key factors: the voluntary nature for state and LEOs to offer ballot tracking services in absence of a federal mandate and the limited applicability of supporting international countries to honor requirements to conduct scanning on international mail pieces within the structure of the Universal Postal Union (UPU).

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Introduction

FVAP works to ensure members of the Uniformed Services and the U.S. Merchant Marine, as well as their eligible family members, and overseas U.S. citizens are aware of their right to vote and have the tools and resources to successfully do so - from anywhere in the world. However, voting is more complicated for active duty military members and overseas citizens than for local voters.

In 2009, Congress amended the Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA) to include provisions that further informed the 2016 Military Ballot Tracking Pilot (MBTP) concept. Each state official must provide a free access system for military and overseas citizens to verify the status of their respective voted ballots, specifically whether or not the local election official received the ballot.

In addition, the 2009 amendments established expedited mail service for members of the Uniformed Services who are absent overseas voters returning voted ballots in general elections. In cooperation with the MPSA and the USPS, this expedited mail service for returning ballot envelopes from a voter to their respective Board of Election is the equivalent of Express Mail domestically and is readily identified through a dedicated label, known as the Label-11 DoD. Since the 2010 election, this label has provided the ability solely for overseas military personnel and their qualifying dependents to verify the transmittal status of their voted ballot as it travels to the election office. The use of this label leverages existing Military Postal Service (MPS) business rules for the manual processing of parcels, versus standard flat mail pieces, which are handled in bulk and not flagged for individual processing and scanning.

Since its inception, the Label 11-DoD continues to demonstrate its value with the tracking of the voted ballot back to the election official and expedited handling. However, by statute Label 11-DOD does not afford the opportunity for overseas military personnel to track the status of blank ballot packages on route to them from LEOs. The MBTP intended to provide voters with assigned tracking numbers to anticipate arrival of a ballot or to take action by completing a Federal Write-In Absentee Ballot (FWAB) as a backup ballot should the official state ballot suffer delivery delays.

The MBTP intended to serve as a proof-of-concept approach to leverage existing infrastructure to serve these voters in a more effective fashion and designed to accomplish multiple objectives:

- 1. Demonstrate the viability of providing full lifecycle tracking of ballots to and from overseas military personnel;
- 2. Provide enhanced customer service for overseas military personnel to verify successful shipment of voted ballots to election official from overseas locations; and
- 3. Leverage tracking data to help identify whether this level of tracking may also dispel perceptions of inherent problems with overseas mail shipments and systemic mail problems.

The 2016 MBTP accomplished all of these objectives based on a limited analysis of just over 1,500 ballots dispatched to overseas military personnel. The scale of the 2016 MBTP was constrained by existing infrastructure, financial resources, and reliance on the voluntary participation of election officials through the FVAP-sponsored cooperative agreement with the CSG. In 2018, the CSG prepared and published a report on the conduct of the 2016 MBTP, which is included as a technical appendix with pertinent excerpts incorporated directly into this report.

In 2016, FVAP leveraged its cooperative agreement with the CSG to conduct a pilot study on the use of full-circle tracking of military ballots transmitted to and from overseas military personnel. Research conducted by FVAP in 2012 pointed to an ongoing myth of voted ballots returned from overseas military personnel not being considered for counting toward election results unless the election totals fell within a particularly close margin. FVAP recognized and continues to combat this myth through its informational materials and broader awareness campaigns to educate active duty personnel and overseas citizens that each ballot that is timely received must be considered for final disposition, as either accepted or rejected, in compliance with state laws and administrative reviews.

This report addresses the possible expansion of a pilot similar to the 2016 MBTP, costs associated with the possible inclusion of all voters eligible to vote under UOCAVA.

In passage of the FY20 NDAA, Congress specifically required that FVAP report on the possible expansion of the MBTP, but also requested a review of the MBTP to include a broader applicability to all eligible citizens:

SEC. 580D. STUDY ON TWO-WAY MILITARY BALLOT BARCODE TRACKING. (a) STUDY.—The Director of the Federal Voting Assistance Program of the Department of Defense shall conduct a study on the feasibility of a pilot program providing full ballot tracking of overseas military absentee ballots through the mail stream in a manner that is similar to the 2016 Military Ballot Tracking Pilot Program conducted by the Federal Voting Assistance Program.

(b) REPORT.—Not later than one year after the date of the enactment of this Act, the Director shall submit to Congress a report on the results of the study conducted under subsection (a). The report shall include—

(1) an estimate of the costs and requirements needed to conduct the pilot program described in subsection (a);

(2) a description of the organizations that would provide substantial support for the pilot program;

(3) a time line for the phased implementation of the pilot program to all military personnel actively serving overseas;

(4) a method to determine under the pilot program if a ballot was counted, and a way to provide such information to the member of the Armed Forces casting the vote; and

(5) a description of the efforts being undertaken to ensure a reliable and secure military ballot tracking system.

As further noted in the Conference Committee Report:

"The committee encourages the FVAP to continue and expand the MBTP to additional military voters and their eligible family members. The committee directs the Director, FVAP, to submit to the Committees on Armed Services of the Senate and the House of Representatives, the Senate Committee on Rules and Administration, and the House Committee on Administration, not later than January 29, 2021, a report on the expanded MBTP. This report shall include: (1) The scope and cost of the expanded program; (2) The projected cost of extending this program to all eligible voters under the Uniformed and Overseas Citizens Absentee Voting Act(Public Law 99–410); (3) The organizations that provided the FVAP substantial support in conducting the pilot, a description of the support, and costs associated with that support; and (4) Recommendations on the process and steps necessary to expand the program to all eligible overseas members and their families."

On March 7, 2021, President Biden signed Executive Order 14019 requiring the following:

The Secretary of Defense, in coordination with the Department of State, the Military Postal Service Agency, and the United States Postal Service, shall take all practical steps to establish procedures to enable a comprehensive end-to-end ballot tracking system for all absentee ballots cast by military and other eligible overseas voters under the Uniformed and Overseas Citizens Absentee Voting Act, 52 U.S.C. 20301 et seq.

Implementation of the 2016 Military Ballot Tracking Pilot

During the initial planning stages of the 2016 MBTP, all the principals (CSG, the USPS, FVAP and the MPSA) identified the inherent risk involved with developing and implementing a pilot initiative during a Presidential election. With this caution in mind, all the pilot participants began to document the existing environment and infrastructure for tracking of military ballots overseas, but also the supporting legal framework for offering this level of service. The principals formalized key areas of responsibility to ensure that all aspects of the MBTP were assigned to the appropriate responsible party.

MBTP Project Areas of Responsibility

The Council of State Governments

- Lead sponsor and project management source
- Project management, financial and administrative support to LEOs

Federal Voting Assistance Program

- Lead facilitator for project and overall government sponsor for cooperative agreement with CSG
- Primary researcher for post-pilot data and findings

United States Postal Service

- Key technical asset for guidance
- Technical support for setup and configuration

Military Postal Service Agency

- Key technical assets for guidance with MPS
- Standardize guidance to MPS personnel on scanning MBTP items

Local Election Officials

- Key implementer of program specifications
- Preparing official ballot packages with assigned barcodes for outbound and returning ballot envelopes

Early project discussions focused on clarifying the existing business rules and technical infrastructure to support the pilot program. Currently, the use of Intelligent Mail barcode, or IMb tracking provides visibility to one of two gateway points (Chicago and Miami) prior to entering the MPS network, at that point any blank ballots are not tracked since they are regular flat envelopes, not parcels. IMb tracking is typically used to assist LEOs with tracking of ballots within the USPS mail stream and may be present on mailing address labels placed on traditional ballot envelopes, or flats. Absentee or by-mail voters do not have the ability to independently track ballot envelopes using IMb tracking.

The USPS uses in-stream processing automation to capture IMb tracking information. However, MPS is not equipped to scan IMb barcodes in the field, mainly due to the supporting logistics and existing business processes for handling standard envelopes versus parcels. MPS personnel are equipped with barcode scanners and regularly scan parcels that have an Intelligent Mail Package Barcode, or IMpb, but they do not currently do this for letters or flats with an IMb.

Additionally, once an absent overseas uniformed services voter receives a general election ballot, votes it, and returns it to a Military Post Office (MPO), each ballot receives a Label 11-DoD, which is manually applied to the envelope by military postal clerks. Subsequent to the 2016 MBTP, use of the Label 11-DoD has been expanded to include active duty military personnel operating at embassies and consulates with access to Diplomatic Post Offices (DPO). This barcoded tracking number provides full tracking visibility from the time of scan acceptance, to first formal entry point into the MPS and delivery to the local election office.

The MBTP project team focused on leveraging existing MPO business processes to support the pilot and lower the overall risk in execution of the project. Consensus quickly pointed to the need for processing these ballot materials as parcels and using existing products offered by the USPS in order to leverage the IMpb as the standard. An existing USPS product platform, Click-N-Ship Business Pro, was leveraged as the primary tool to support the preparation of prograde MBTP materials (that is, those sent from the United States to overseas MPOs).

Figure 1: Initial Ballot Package Setup Used During the 2016 MBTP

Two-Way Military Ballot Barcode Tracking:



Nested Priority Mail Express ballot return envelope containing preaffixed and pre-assigned Priority Mail Express Barcode (Label-11 DoD), Official Election Mail log and LEO office address enables full visibility of voter's ballot in transit.

Existing Authorizations

Pursuant to section 3406 of Title 39, United States Code (U.S.C.), Congress authorizes the use of a postage paid indicia for designated election materials (emphasis added):

"(a) Balloting materials under the Uniformed and Overseas Citizens Absentee Voting Act (individually or in bulk)—(1) shall be carried expeditiously and free of postage; and (2) may be mailed at a post office established outside the United States under section 406 of this title, unless such mailing is prohibited by treaty or other international agreement of the United States."

At the time of UOCAVA's passage in 1986, the USPS offered Express Mail levels of service, but Congressional intent at the time indicated that while Express Mail was available, it did not seem necessary to codify this level of service. As a result, most prograde ballots sent under section 3406 are mailed by Election Officials using First-Class Mail. In 2009, Congress enacted the MOVE Act requiring the return of voted ballots from overseas absent uniformed service voters in an expedited fashion pursuant to section 20304(b)(2) of Title 52, U.S.C.:

"Cooperation and coordination with the United States Postal Service the Presidential designee shall carry out this section in cooperation and coordination with the United States Postal Service, and shall provide expedited mail delivery service for all such marked absentee ballots of absent uniformed services voters that are collected on or before the deadline described in paragraph (3) and then transferred to the United States Postal Service."

This section of the UOCAVA applied the term "expedited" once again, but also includes a specific window for the successful return of these voted ballots back to election officials from

overseas military personnel and their eligible family members, which necessitated the use of a particular minimum level of service to meet the new timeframe. Section 20304(b)(3) of Title 52, U.S.C., states:

"Except as provided in subparagraph (B), the deadline described in this paragraph is noon (in the location in which the ballot is collected) on the seventh day preceding the date of the regularly scheduled general election for Federal office."

In order to meet this threshold of seven days or less for the return of voted ballots, the USPS enabled the Label 11-DoD to provide the expedited return, a Priority Mail level of service. In 2016, these two differing levels of service for prograde ballots under section 3406 of Title 39, U.S.C., and free postage (i.e., first class mail) versus the retrograde return of voted ballots from overseas military personnel (i.e., Express Mail) created a challenge in the MBTP as each participating jurisdiction would have to effectively agree to increase the class of service associated with prograde ballots to Express Mail to leverage parcel level tracking.

This increased class of service and resulting increased level of postage was subject to reimbursement by the CSG as federal agency partners could not process participating balloting materials for prograde transmission based on limitations in current statute. However, the return of voted ballots (retrograde) was subject to existing authorizations and postage due to its existing authorities for expedited mail treatment.

Setting The Course

The MBTP federal stakeholders identified key business requirements that would support the execution of the pilot project. These elements consisted of the following:

- 1. All prograde (i.e., outbound from the election office to the voter) ballots for military personnel serving overseas would be processed with IMpb tracking through the USPS Click-N-Ship Business Pro downloadable software.
- 2. Postage for these blank balloting materials at the increased Priority Mail rate would be paid for by CSG through its FVAP cooperative agreement.
- 3. Flat Rate shipping envelopes would be provided by the USPS to participating election offices.
- 4. The Label 11-DoD would be dispatched and staged at each participating local election office for direct application for the return envelopes.
- 5. Each assigned return ballot envelope, with the Label 11- DoD attached, would be placed inside the prograde flat rate envelope.

- 6. Prograde and retrograde (i.e., voted ballot returning from voter to local election office) barcode pairings would be associated with a voter record to assist with customer service and overall tracking.
- 7. Voters would access official scan information via the USPS Track a Package application.

These agreed upon business requirements demonstrated a high-level consensus; however, they needed to be tested and refined in a realistic election setting.

The Orange County (California) Registrar of Voters agreed to facilitate testing of the initial planning stages of the MBTP. The cooperation of the Orange County Registrar of Voters was a critical point of success for the MBTP, as it allowed for the development and refinement of the overall MBTP approach before introducing it to the five remaining election jurisdiction participants in the MBTP. Ultimately, the Orange County Registrar of Voters became the test site for the initial design work of the MBTP. In the spring of 2016, the MBTP developed a test that verified the technical requirements of the MBTP design, but did not include applying the Label 11-DoD. Orange County used Click-N-Ship Business Pro downloadable software, which incorporates IMpb barcodes, to verify alignment with existing parcel-scanning operations throughout the MPS network.

With the successful conclusion of the Orange County test, MBTP orchestrators (CSG, FVAP, USPS and MPSA) formalized the design of the pilot parameters and hosted a webinar in June 2016, with all six participating local election jurisdictions to conduct a walkthrough on the approach. During this webinar, Escambia County (Florida) recognized the importance of leveraging existing balloting materials and instructions from the local election office to minimize the disruption to the voters' experience. Any deviation to the standard voter instructions would create voter confusion and lead to an increase in ballot rejection risk if voters failed to properly sign returned balloting materials.

Based on this discussion, the following additional features were incorporated into the official MBTP mail piece contents:

The final mail piece design for the MBTP consisted of a letter from the FVAP Director, the official ballot envelope used by each local election jurisdiction, and the ballot return envelope with a pre-affixed Label 11-DoD. All of these contents were placed into a large prograde flat rate envelope with a shipping label generated from Click-N-Ship Business Pro downloadable software. Each local election official would assign barcodes to the voter records and notify all voters qualified for processing under the MBTP how to access tracking information on USPS.com.



Figure 2: Final Ballot Package Used in 2016 MBTP Reflecting Two Nested Barcodes

The USPS provided direct customer support to each local election official on how to operate Click-N-Ship Business Pro downloadable software to ensure no disruptions with postage processing. By September 23, 2016, all ballots were dispatched to existing absentee ballot applicants receiving mail at an Army/Air Force or Fleet Post Office (APO/FPO) address. Each election official reported prompt acceptance of the materials within the USPS mail stream, and no technical support requests were received. At this point, the MBTP pilot was in full execution and in the hands of voters to receive, vote, and return their ballots.

Key Observations by Participating LEOs

Feedback from participating LEOs included:

- 1. One-hundred percent of the LEOs participating in the MBTP were satisfied or very satisfied with the MBTP.
- 2. One-hundred percent of the LEOs participating in the MBTP were aware or very aware of the pilot project's scope and objectives.



3. Sixty-five percent of the LEOs participating in the MBTP thought the requirements for participating were reasonable or very reasonable.



4. Sixty-five percent of the LEOs participating in the MBTP believe full ballot tracking should continue, with 35 percent undecided.



Based on feedback from the participating jurisdictions, the manual application of shipping labels and assembly of envelopes were the most onerous parts of the process. This raised concerns over the long-term viability of the MBTP as a permanent service model for overseas balloting materials, unless automation is possible through the use of a standard-sized parcel envelope to support processing through commercial mail service providers.

Other suggestions identified amongst the key participants of the MBTP included:

- Ballot tracking numbers should be printed internally by local election offices.
- Expanded size of flat rate envelope limits flexibility (i.e., no window envelopes).
- Future efforts should be expanded beyond six jurisdictions.
- Validation of the overseas military addresses was the biggest challenge due to legacy absentee ballot applications and old addresses.
- The USPS-provided envelopes were an asset.
- Expedited return and tracking of balloting materials should include all overseas voters, including non-military overseas citizens.
- Leverage proactive e-mail communication to voters to engage them throughout the process.



Figure 3: Participating Jurisdictions and Number of Ballots Processed in 2016 MBTP

Voter Satisfaction

The most valuable data came from the military voters themselves, via the satisfaction survey sent from their respective local election jurisdictions. The survey had 14 questions that



primarily asked about whether they had received ballot materials, used the tracking system for their blank and voted ballot, and how satisfied they were with the materials and tracking system. Of participating voters, 98 percent were satisfied or very satisfied with the conduct of the MBTP, and 87 percent were confident or very confident their ballot would be counted in the election.

The vast majority of respondents said they were satisfied and found the process easy. Nearly all respondents answered that they were satisfied with the email instructions, found it easy to use the ballot tracking process and found the instructions easy to navigate.



Among users of the MBTP tracking service, 82 percent were very satisfied. Of the voters who did not use the tracking information available to them, 62 percent said they were satisfied with the service. Fifty respondents commented on why they did not check the status of their blank ballot.

They primarily said:

- 1. They trusted the system, meaning they trusted their ballot would be delivered.
- 2. The ballot arrived so quickly after they received the notice that it wasn't necessary to check.
- 3. They were busy with work or life.

All of these qualitative findings point to a service that was very well-received for those who used it. For those who did not use it, overall satisfaction registered based on the knowledge that it was there for their use should it become necessary.

Qualitative Findings

The evaluation of the MBTP consisted of a series of parts including the technical feedback from the key federal stakeholders, CSG, and each participating local election jurisdiction. These findings were intended to isolate the technical challenges with the MBTP and assist with questions about the scalability of this approach for all election jurisdictions in the United States to consider. Another piece of the evaluation consisted of a qualitative satisfaction survey sent to the voters themselves who received an MBTP parcel. The final stage of the evaluation focused on the quantitative research findings that could be pulled from the overall date/time scan event data for all ballots within the MBTP.

Technical Findings

The total number of ballots processed through the MBTP was 1,588. All ballots were mailed to active duty military personnel who requested that a ballot be mailed to an APO/FPO address for the 2016 general election. Ballots were sent from three jurisdictions with larger military populations: San Diego (California), Escambia (Florida), and Okaloosa (Florida), and three jurisdictions with smaller military populations: Orange (California) Denver (Colorado), and Harris (Texas).

The MBTP was designed to capture data on the following research questions:

- 1. What percentage of ballots were successfully tracked and returned?
- 2. How uniform is the scanning data throughout the tracking process?
- 3. Were there regional differences between military mailboxes in Asia, Europe, and the Americas?

4. How long did the absentee voting process take overall and by segments?

The resulting data analysis attempted to develop a cumulative picture of the scan events and all available points to assess the overall ballot delivery success:

- 1. **Tracked Anywhere:** One-hundred percent of ballots had at least one scanned tracking entry. This means a voter could visit the tracking system and at least see some evidence that his or her ballot was on the way.
- 2. USPS Delivery Notice: Fifty-eight percent of ballots had a USPS delivery notice. This means a voter could visit the tracking system and know for sure that his or her ballot was delivered. This is important since active duty military may need to visit their MPO to retrieve their ballot, instead of having their ballot hand-delivered to a personal mailbox.
- 3. **Reached MPO:** Seventy-six percent of blank ballots reached an MPO on their outbound journey. This does not guarantee it was the correct MPO, but it is strongly correlated with the destination ZIP Code based on the existing absentee ballot application on file with the local election office.
- 4. **Reached Destination ZIP Code:** Sixty-eight percent of ballots reached the destination ZIP Code identified by each jurisdiction. This was calculated by comparing the jurisdiction destination ZIP Code to the last valid outbound ZIP Code.
- 5. **Final Ballot Destination Determined:** Ninety-three percent of ballots either reached an MPO, reached their destination ZIP Code, had a USPS delivery notice, or were successfully returned to their jurisdiction—indicating that the ballot arrived to the voter, but it did not show in the data.



TOTAL SCANS RECEIVED DURING BALLOT TRANSIT

93 PERCENT OF BALLOTS EITHER REACHED AN MPO, REACHED THEIR DESTINATION ZIP CODE™, HAD A USPS DELIVERY NOTICE, OR WERE SUCCESSFULLY RETURNED TO THEIR JURISDICTION.

Overall Findings

- An estimated 85-90 percent of all ballots were successfully delivered to destination APOs/FPOs.
 - This calculation was a result of the overall data analysis with additional validation reported from FVAP's 2016 Post-Election Survey of active duty military personnel, in which 83 percent reported receiving their ballots.



- Given the margin of error and all circumstances, the projection of 85-90 percent delivery success is a reasonable approximation for measuring the delivery of ballots to destinations.
- The majority of participating voters were satisfied or very satisfied with the conduct of the MBTP.
- A majority of participating voters were also confident or very confident their ballot would be counted in the election.
- Variability with the application of parcel scans requires further analysis to better identify proxies for identifying successful deliveries and isolating key milestones for voter visibility.
- MPS far exceeded the 7-day service level target with average return time of 4 days.



Tracking Data

Average ballot transit time for MBTP ballots when isolating Armed Forces Europe and Armed Forces Pacific:

- Armed Forces Europe (AE): prograde—10 days, retrograde—3 days.
- Armed Forces Pacific (AP): prograde—11 days, retrograde—4 days.

- Ballots sent to AE installations were slightly more likely to be successfully scanned and returned and have final destination scans applied confirming delivery (13 percent).
- Across the vast majority of measures, ballots transmitted to AE and AP regions performed very similarly. AE took a median 27 days and AP a median 30 days to complete the absentee ballot process. Ballots sent to AP regions at the median took1 day longer to reach the voter, 1 day longer to vote, 1 day longer inbound time and 1 day longer transit time.
- The median prograde ballot took 10 days to reach its last recorded destination. This calculation is based on the date provided by the participating local election office for when the ballot was mailed.
- The median time a voter held on to the ballot before voting and submitting it to the MPO for return was 12 days.
- The median retrograde ballot took 4 days between the date of mailing and the date that the participating local election office reported receiving it.

It is important to note that the median retrograde transit time was about 2.5 times as fast as the prograde transit time, which aligns with the expedited treatment of voted ballots from MPOs operating overseas. The overall cost of the 2016 MBTP was just under \$31,000 with the vast majority of these costs associated with postage resulting from an initial test mailing and subsequent Priority Mail postage for prograde balloting materials.

Findings for the Expansion of the MBTP

As requested by Congress, the inclusion of all citizens eligible to vote under UOCAVA into the parameters of a MBTP may not be possible for all overseas voters, because not all foreign postal operators offer the types of tracked services that serve the needs of mailers sending balloting materials. While substantial progress could be made in connection with major trading partners, a universal solution may not be possible at this stage. However, going forward testing will occur to determine possible tracking solutions available for voted ballots returning into USPS operations from Embassies and Consulates.

Scalability for Expanding the Pilot or Institutionalizing Service Level

The 2016 MBTP benefited from its small size and partnerships as existing software products and mailing infrastructure were repurposed with heavy reliance on manual processes. Depending on the level of infrastructure there may be impacts to administrative and/or business operations especially for those jurisdictions that must scale up to accommodate a larger number of voters. Therefore, FVAP envisions a pilot program in the future as a series of tests to educate and refine possible technical solutions to support greater levels of implementation across election jurisdictions with varying levels of populations.

Technical Research into a Standardized Barcode for Ballot Tracking

Under current Federal law, state and LEOs are not required to provide comprehensive ballot tracking. Jurisdictions typically use an IMb or a third-party vendor system to track ballots sent by mail. The continued expansion of the IMb usages across election jurisdictions points to the need for USPS and MPSA to conduct testing on how best to integrate the IMb into a comprehensive tracking effort and adjust business processes accordingly. IMb is designed to provision scan data back to the mail owner or mail service provider. Some LEOs use IMb scan data to monitor ballot mail movement in the mail stream and provide methods for voters to track outbound and return ballot mail. Testing will ultimately determine the overall viability of the IMb versus another type of barcode that more closely aligns with MPS processes and provides a plain text tracking code directly to voters.

Integration of Scan Data into Election Systems

The ballot tracking experience in 2016 leveraged the existing ballot tracking gateway available on the USPS website, but this ballot tracking experience does not capture the final disposition and confirmation by the election official that the ballot was received and subject to final acceptance and tabulation. Existing barcode scan events identify only a change in custody and receipt. Future pilot efforts would identify specific scan events and identify key data points for election officials to integrate with their own internal reporting systems voters are able to use to verify final disposition of their returned ballots.

USPS/MPSA Process Improvements

Before offering recommendations regarding seamless UOCAVA Ballot Mail processing and tracking, any pilot program and any subsequent testing will need to be completed in order to evaluate various commercially available barcode options and envelope designs to determine the least disruptive and highest efficacy solution. In recognition of some of the current business process limitations regarding ballot mail visibility, USPS can work with FVAP, MPSA, and other organizations to provide election officials with new letter and flat size UOCAVA ballot envelope templates. Pilot participants can test the efficacy of various envelope template designs. The pilot would also provide participants an opportunity to identify business process improvements for all stakeholders, including DPM, USPS, and MPSA, as well as opportunities to improve scanning processes, such as handheld scanner deficiencies.

From time of authorization of an expanded pilot program and with appropriate funding, FVAP and its federal partners could provide initial technical and process recommendations and costs associated with enhancements to existing business processes and services within one calendar year. Any new technical solutions and measurements will require more evaluation.

Future Pilot Program Design and Strategic Milestones

In pursuit of answering these technical challenges, FVAP envisions a pilot program conducted as a series of tests to educate and refine possible solutions to support greater levels of implementation across election jurisdictions. The 2016 MBTP represented an effective proof-of-concept in terms of its original objectives, but any future pilots should be used to conduct field testing outside of actual elections. The 2016 MBTP consisted of approximately 1,500 ballots. Any future pilot program would consist of the equivalent level of volume and at least four rounds of testing leveraging participants from VAO serving at overseas military installations or various U.S. Embassies and Consulates. Currently, over 1,200 VAO conduct voting assistance

responsibilities at overseas locations with approximately 242 embassies and consulates also supporting voting assistance activities. Through interagency partnerships, these populations would be leveraged to conduct a series of tests on the technical parameters and to identify specific answers to the challenges identified during the 2016 MBTP.

FVAP remains in an existing cooperative agreement with the CSG through December 31, 2022. The existing cooperative agreement established the Overseas Voting Initiative as a working group of state and LEOs to identify best practices when serving UOCAVA voters. This mechanism served FVAP well in 2016 as all associated postage and administrative costs to include reimbursement of participating jurisdictions, were included in the operation of the cooperative agreement at that time. These tests will examine the following elements:

- 1. Integration of IMb, or acceptable alternatives, for tracking setups for prograde ballots;
- 2. Ballot envelope design changes to improve visibility, automation, and manual processing;
- 3. Identification of key scan events, provisioning scan events to mail owner or mail service providers events and data for integration into election official databases;
- 4. Possible changes to Label 11-DoD distribution or label generation by state and local election officials; and
- 5. Qualitative user experience data collection.

At the end of these tests, FVAP, DPM, USPS, and MPSA will determine business processes with the highest efficacy and will define a way forward.

Conclusion

The 2016 MBTP was the first of its kind to provide full life-cycle tracking of ballots throughout the USPS-MPS network. It increased customer service for voters and provided valuable research data to help identify areas for improvement on both a federal and local level.

In response to requirements enacted in the FY20 NDAA, FVAP engaged its federal partners to review the potential for an expanded pilot program that addresses the following requirements:

- (1) The scope and cost of the expanded pilot program;
- (2) The projected cost of extending this pilot program to all eligible voters under the UOCAVA (Public Law 99–410);
- (3) The organizations that provided FVAP substantial support in conducting the pilot, a description of the support, and costs associated with that support; and
- (4) Recommendations on the process and steps necessary to expand the program to all eligible overseas members and their families.

In pursuit of these requirements, FVAP will carry out an expanded pilot program consisting of a series of procedural and technical tests that closely replicate the level of effort conducted in 2016, but conducted outside an election event.

Glossary

APO	Army / Air Force Post Office
CSG	Council of State Governments
DPO	Diplomatic Post Office
DPM	Diplomatic Pouch and Mail Division
FPO	Fleet Post Office
FVAP	Federal Voting Assistance Program
IMb	Intelligent Mail Barcode
IMpb	Intelligent Mail Parcel Barcode
LEO	Local Election Official
MBTP	Military Ballot Tracking Pilot
MOVE Act	Military and Overseas Voter Empowerment Act
MPO	Military Post Office
MPS	Military Postal Service
MPSA	Military Postal Service Agency
NDAA	National Defense Authorization Act
Prograde	Materials sent to voters
Retrograde	Materials returning from voters
UOCAVA	Uniformed and Overseas Citizens Absentee Voting Act
UPU	Universal Postal Union
U.S.C.	United States Code
USPS	U.S. Postal Service
VAO	Voting Assistance Officer