1. This bill in combination with anyone that hampers the ability of the USPS is a toxic mixture. We had a president that ordered the upheaval of the USPS and sowed doubt about the USPS’s ability to deliver a piece of mail in a timely fashion.
	1. Any ballot that is lost in the mail or needs reissued for any reason is running up against a very short timeline.
	2. Snowbirds or those temporarily out of state are greatly harmed by this bill. In my experience there are vacation destinations where it takes well over a week for an individual to receive their ballot. Sometimes it can be up to two weeks. Those individuals have to immediately vote the ballot and send it back, again waiting up to a week or two to see if it was received back in the office for counting. If that again proves to be true, as I would expect it will, it will mean that some individuals will not receive their ballot until it is too late to return it. If they are able to get in back in the mail ahead of the post mark deadline, it’s likely that the ballot will not be received by noon on the Monday following the election as dictated in 53.17(2) and therefore rejected.
2. If this bill truly has no impact on the number of individuals voting absentee, then you have to think about the workload for each county election office. You would be cramming the tasks and oversight of a previously 19 day operation into an 8 day operation. (If you exclude Sundays from the tally, it’s even less.)
	1. It would essentially mean that larger counties would be processing, stuffing and mailing a minimum of five thousand ballots a day, which would be an incredibly daunting task for county election offices.
	2. This past year, to help alleviate the crunch of having to process, stuff and mail the whole absentee ballot quantity in a short time period, counties opted to send their own absentee ballot mailing. This proved to be crucial to managing the workload in an efficient manner in to eliminate the errors that can come with rushing to complete a task. When you reduce the timeframe for absentees to 18 days, you also reduce the timeframe to mail ballots as well. The deadline to mail ballots out remains the same as either 10 or 11 days before the election depending on the type of election. With a shortened timeframe of 18 total days for absentees any inadvertent error that can come when rushing to process and mail thousands of ballots a day is greatly magnified to the disservice of the voter. Keep in mind that the Auditor may also be on the hook for any data entry errors committed by their office while performing the overwhelming and nearly impossible task of processing tens of thousands of requests in a matter of days.
3. Auditors need to be able to mail their own request forms.
	1. This manages workload as previously stated.
	2. Aids the voters without internet or printing capabilities.
	3. Barring this activity is a disservice to the public. It also creates inconsistent service when a voter registration form can be mailed to a voter, but not an absentee ballot request.
	4. Barring this activity creates barriers for rectifying errors. If a voter submits an incomplete absentee ballot request form, it would forbid the Auditor from sending the voter another form with a notice that their first request was incomplete. Instead, the voter would receive the notice and once again have to procure a form from another avenue even though a form could be included with the notice at no additional charge to the taxpayer.
4. Restricting who can return a ballot for someone else is creating unnecessary loopholes.
	1. By restricting this to a family member or household resident, it creates an inconsistent application of the law when drop boxes are used.
		1. Voters appreciated using drop boxes during the pandemic because they were contactless. If a prohibited person is delivering a ballot to the Auditor’s Office for someone else, they will just place it in the drop box so that they aren’t questioned or chastised for collecting ballots as a prohibited individual.
		2. Although the intent is to limit ballot harvesting, this bill will just increase the use of drop boxes by individuals who are prohibited from returning a ballot on behalf of another.
			1. Each drop box would have a security camera, but given the shortened absentee timeframe, Auditor’s Office staff will not have the time to review if an individual is placing ballots in the drop box for individuals they are prohibited from collecting ballots from.
5. The fines and suspension of Auditors needs work if it is to be implemented effectively.
	1. The Iowa Secretary of State should not be the judge and jury imposing disciplinary penalties against this type of behavior. Quite often there are feuds between Secretaries of State or their staff and County Auditors. There are no set parameters or guidance on how punishment would be applied. Because of the feuds, there will most definitely be County Auditors who are treated more severely than others in terms of the amount they will be fined.
	2. Too much power is placed in the hands of the Iowa Secretary of State to punish those who don’t agree with policies or guidance. They solely have the power to choose who they wish to send a technical infraction to, the amount of the fine, and when or if to revoke a suspension. It appears that the only due process an Auditor would receive is through the appellate process which will cost a county to litigate.
	3. It seems as if there should be an independent board similar to the Iowa Ethics and Campaign Disclosure Board that independently, and free of any bias, reviews the facts of a technical infraction and recommends specific punishment.
6. Inactivating records for missing a General Election creates more unnecessary work for County Auditors.
	1. Way more people vote in Presidential General Elections than Gubernatorial ones. This will lead to the constant inactivating and reactivating voters unnecessarily. It’s important to note that the voter has to remain inactive for two successive General Elections before becoming cancelled. It simply creates a carousel workload of inactivating when they don’t care to vote for the Governor, then reactivating when they vote for President, then inactivating them again when they don’t vote for the Governor.
	2. It seems that the solution if you really care to clean up the voter rolls would be find the voters that have had no activity for four years and inactivate them. The current process isolates those voters and only mails them a notice saying that they haven’t voted or had any voter initiated updates to their record in four years, but it does not inactivate them unless the notice is returned undeliverable or notice is given by a third party. By sticking strictly to these voters who haven’t had any recent registration updates, you hone your focus more clearly on the individuals who may no longer be living in the state rather than creating a carousel of status changes to the ones that just choose to skip voting.
7. Election Board – Banning a candidate standing for election on the ballot from assisting a voter)
	1. The law currently makes an exception for election board panels that allows candidates who are running unopposed to still serve as precinct officials.
	2. It’s important for the legislature to know that even though a particular candidate is prohibited from assisting a voter, it does not mean that an unopposed candidate wouldn’t not be present at a precinct when a voter votes.
8. Technicalities will matter in terms of technical infractions issued.
	1. This bill states that “the commissioner shall not send an absentee ballot application to a voter.” It also states that no absentee ballot application shall be provided to a registered voter with any field prefilled, except that of the type of date of the election. However current law, and one referenced and modified by this bill states that a ballot application submitted more than 70 days prior to the date of the election shall be returned to the voter. If this is performed as the code specifies, the Auditor would be in violation of other parts of the code by 1. Sending a form to a voter, and 2. Sending a prefilled form to a voter.