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Dear Boulder County Community and Stakeholders:

The Boulder County Clerk and Recorder's Office is charged with conducting elections for Boulder County. Our office takes great pride in serving our community in this capacity.

We are dedicated to conducting elections centered on accuracy, accessibility, integrity, and security for all our citizens.

In 2016, the United States saw unprecedented attempts to undermine the integrity of elections infrastructure. Across the country, election offices' websites, state voter registration databases, and networks were targeted in an attempt to sow fear and doubt into the minds of voters.

In response, the U.S. Department of Homeland Security (DHS) designated election systems as part of our nation's critical infrastructure in 2017. This designation signaled to election administrators, voters, industry partners, and all Americans that election security and integrity are a national priority.

Since the designation, there has been an influx of attention on elections – including increased funding, proposed legislation, purchasing of new voting equipment, and forging of new partnerships. Thanks in part to this increased focus, our elections have never been more secure.

But we know the threat is evolving. As the foundation of our democratic institutions, elections provide citizens with the power to influence our community's future, and any attack on our election system has the potential to compromise the integrity of our democracy.
Our office has prioritized security throughout all of our operations, conducting formal assessments and implementing steps to protect and affirm our most sacred right as Americans. We know that we have a central role to play in sustaining your trust in our elections, so we are continually enhancing our security posture by adopting advanced security procedures, technologies, and innovations that protect the sanctity of votes and voter information. We have also implemented significant staff security awareness training and forged stronger partnerships with local, state, and national entities.

Our office also believes that our work to enhance election security will be most effective when the voting public understands it: meaningful transparency strengthens our democracy. We must communicate what we are doing so our community can have a deeper understanding of what the threats are, how we are actively working to mitigate them, and how they can partner with us in these efforts.

That is why we created this Boulder County Elections – Election Security Community Briefing. Our goal with this report is to ensure our community understands Boulder County’s approach to election security and the actions we are undertaking to protect your voter information and the integrity of your vote.

Boulder County is committed to ensuring every voter has the opportunity to have their voice heard, and we appreciate your interest in these efforts.

In service,

Molly Fitzpatrick
Boulder County Clerk and Recorder
This report is organized according to what we see as the “Three Pillars” of our security posture.

The Colorado Election Model, Leveraging Partnerships, and our own Cybersecurity Program all work together to form a strong and diverse approach to addressing emerging threats to our elections. The following sections provide detailed information for each of these pillars and will hopefully improve your understanding of how we work to secure our elections processes and information.

The Colorado Election Model
In 2013, Colorado overhauled the way we administer elections, and security was strongly emphasized in the redesign. The state moved away from a polling-place election model toward a secure and effective mail-ballot model with flexible in-person voting options.

Leveraging Partnerships
Protecting our elections is a shared responsibility between different government agencies and the private sector. We actively work to identify and establish partnerships that supplement our security expertise and help us to continuously identify and mitigate security risks.

Boulder County Elections Cybersecurity Program
The goal in creating our Elections Cybersecurity Program was to develop a strategic framework and roadmap that anchors our time, resources, and focus.
Colorado has a nationally recognized and acclaimed elections model that centers around security. The design includes recommendations from industry experts, including:

MAIL BALLOT DELIVERY, IN-PERSON VOTING, PAPER BALLOTS, AND SAME-DAY VOTER REGISTRATION

Multiple Voting Options
Voters are sent a ballot in the mail, which they can return by mail, in-person at a Vote Center or election office, or to a 24-hour drop box (the mandatory minimum number of drop boxes is mandated in state election statute). If voters choose to vote in-person or need a replacement ballot for any reason, they may visit a Vote Center (formally known as a Voter Service and Polling Center or VSPC) to vote up to and through Election Day.

Paper Ballots
At Vote Centers, voters can cast their vote using either a paper ballot (same as a mail ballot) or using a ballot marking device. These devices are compliant with the accessibility requirements of the Help America Vote Act (HAVA) and the Federal Voluntary Voting Systems Guidelines (VVSG). These devices assist the voter with marking their choice but do not electronically record the votes. Instead, each device has its own printer that prints the ballot when the voter is finished. This paper ballot is then turned in to be counted like mail ballots.

Vote Center Security
Each location provides access to secure rooms for voting equipment. All critical equipment is secured with chain-of-custody seals and systematically tracked. After hours, the rooms are securely locked and voting equipment is sealed and stored to ensure election integrity.

Voter Signature Verification
The signature on each mail ballot envelope is reviewed and compared to the signature(s) on file in the voter’s registration record. If a discrepancy is found, the voter is notified and has a window of time to rectify (or “cure”) the issue in order to have their ballot counted. If a voter does not respond, the ballot is not counted, and the case is turned over to the District Attorney for investigation.
Bipartisan Teams

By state law, Vote Centers are run by bipartisan election judges. Bipartisan election judges also handle ballot collection and all ballot adjudication (i.e., working together to understand a voter's intent when a ballot is poorly marked or contains cross-outs).

Surveillance

Each 24-hour ballot drop box is under 24-hour video surveillance from the time the box opens for voter ballot return until it is closed at the end of an election. All boxes remain locked throughout the election period, accessed only by bipartisan teams for ballot collection. Additionally, all ballot processing areas of our office are under surveillance 24-hours a day.

Chain-of-Custody

To ensure no tampering takes place, chain-of-custody is carefully documented and maintained for each Vote Center laptop (used to access the Secretary of State's voter database, assign vote credit, and print ballots), ballot marking devices and printers, and each ballot box, including all containers used to collect ballots from 24-hour boxes on a regular schedule during the election.

Same-Day Voter Registration

Allowing voters to register and cast a ballot on Election Day is not only convenient for new residents or voters who have moved but also serves as a fail-safe if a disaster were to strike, such as an attack on our voter registration system where a voter's registration could come into question.

VOTER REGISTRATION

Statewide Voter Registration Database

Managed by the Colorado Secretary of State in conjunction with county clerks, the statewide voter registration database, known as “SCORE,” streamlines the registration process statewide. This “top down” approach drives standards for security procedures on managing the voter registration system statewide.

User Access Controls

The Secretary of State's office requires all SCORE users to prove identity via a multi-factor authentication process in order to access the database. Both state and county users must go through this process every time they log in to record or update voter registration information.
User Access Standards
The state and our county also require that all employees and election workers use individual user IDs and passwords that provide appropriate access and privileges for their role. We do not allow shared accounts. Additionally, elections staff must only use county-approved devices to access SCORE.

Virus Protection
All counties are required to comply with state-established requirements for anti-virus and malware detection software installed on systems accessing the voter registration database.

Voter Registration List Maintenance
Data is imported from the Colorado Department of Revenue (motor vehicle), Colorado Department of Health (death records), United States Postal Service (change of address), law enforcement agencies (felony convictions), the Federal SAVE database (naturalization/derived citizenship), and other sources to ensure voter information is accurate and only eligible voters receive a ballot.

VOTING SYSTEM

Uniform Voting System
In 2015, the Colorado Secretary of State's Office conducted an extensive competitive bid process to select uniform voting systems to service the state. Dominion Voting System was the initial selection in 2015 and ClearVote Voting System was approved in 2017. Nearly all Colorado counties utilize the Dominion system. These systems were selected after a lengthy public engagement process and pilot testing of four different voting systems in eight different counties. The new systems allowed counties to start performing post-election Risk-Limiting Audits (see below). The use of uniform voting systems across the state improves sustainability, service, collaboration, and support for counties and voters.

Hardware and Software Certifications
The Colorado Secretary of State's Office oversees voting system certification and works with counties to validate rigorous security standards.

Chain-of-Custody for Voting System Components
Voting system software is only issued by the State through a “trusted build” process. A strict and documented chain-of-custody process is followed for all voting system devices. Software is installed on the hardware by designated state or voting system staff. Additionally, Boulder County performs rigorous quality assurance procedures once a trusted build is installed, processing thousands of test ballot scenarios to verify accurate tabulation results.
Air-Gapped Voting System
County voting system components related to the trusted build and ballot processing are on an air-gapped network to isolate the voting system from internet-based threats.

Limited Physical Access
In Boulder County, voting system equipment resides in secure, badge-controlled facilities with limited access and 24/7 video monitoring. Access protocols are required and in place in all Colorado counties.

User Credential Standards
Individual user IDs and passwords are issued only to staff with a defined need to access voting system applications. Passwords meet standards defined by the state, both in terms of password complexity attributes and procedures related to password lifecycle and management.

Voting System File Backups
Voting system files and data backups are regularly generated and securely stored for disaster recovery purposes. Redundant hardware provides protection against a single point of failure.

Pre-Election Equipment Testing
Before each election, the county performs thorough testing, including a public Logic and Accuracy Test, to ensure that ballots are printed correctly and that the voting system is tabulating votes correctly.

Criminal Background Checks
These checks are required annually for anyone who accesses the voting system and voter data.

POST-ELECTION RISK-LIMITING AUDIT
To ensure election outcomes are correct, a statewide Risk-Limiting Audit (RLA) is conducted as part of each election. This process compares the hand marked paper ballot to the voting system’s reading of that ballot.

Cast Vote Record
The tabulation system creates a Cast Vote Record (CVR) for every ballot scanned during an election. The CVR is a digital record of each recorded vote on each ballot.
Auditing Against the Cast Vote Record

After all ballot processing has been completed, the Cast Vote Record file is submitted to the Secretary of State’s (SOS) Office. The SOS uses a random seed (generated by rolling dice) to generate a list of unique individual ballots for each county to pull (see Secretary of State’s Audit Center for more information on generating the random seed). After receiving the list of ballots to audit, county staff retrieves the selected ballots. The “Audit Board” (members appointed by each major political party) observe the ballot pull and then enters the votes for each contest into the SOS’s open-source RLA Tool. This tool then compares the hand-marked votes to the digital CVR (see above).

Validating Election Outcomes

If any discrepancies are found between the Cast Vote Record and the paper ballots pulled, then additional rounds of auditing are conducted until the confidence threshold is met. Typically, when discrepancies are found, it is because of user error (for example, entering the wrong information into the RLA tool). Ultimately, conducting an RLA demonstrates with a state-specified statistical level of confidence that election outcomes are correct.

Statewide Participation

Every county in Colorado conducts an RLA (except for two counties that count their ballots by hand). This demonstrates the validity of each county’s outcomes.

To learn more about the Colorado Risk-Limiting Audit, visit the Secretary of State’s Audit Center page.
In the case of a DDoS attack (Distributed Denial-of-Service attack – where one of our websites is attacked and can no longer be accessed by the public), we have created a contingency site where voters can find reliable and correct election information and results.

One of the most important lessons from 2016 is that better preparation for, mitigation of, and response to future attacks will require enhanced cooperation and communication between a variety of organizations and officials.

After 2016, under the leadership of Clerk Hillary Hall, Boulder County Elections formalized and improved our partnerships with local, state, and national partners to leverage their security expertise while also joining professional cybersecurity networks and organizations to enhance our skill level. This work continues to date.

Here is a list of our core partners and how we work together to secure our elections.

**BOULDER COUNTY INFORMATION TECHNOLOGY DEPARTMENT**

- Administers and oversees county networks and equipment.
- Partners with Elections Division and Rule4, a nationally acclaimed cybersecurity firm, to implement cybersecurity processes and technology improvements.
- Conducts frequent, countywide phishing campaigns and cybersecurity training.
- Monitors election websites and applications daily to ensure no external manipulation to our county website platforms has occurred.
RULE4 – CYBERSECURITY CONSULTANT TO BOULDER COUNTY ELECTIONS & INFORMATION TECHNOLOGY DEPARTMENT (IT)

• Provides cybersecurity consulting services and guidance to help us achieve our tactical and strategic cybersecurity objectives.
• Rule4 team members have worked with Boulder County Elections since 2008, providing recommendations to enhance security and reduce risk.
• Supports implementation of technology and processes.
• Facilitates cybersecurity incident tabletop simulations to help us practice and refine our Cybersecurity Incident Response Plan.
• On-call to provide cybersecurity incident response and recovery services.

COLORADO SECRETARY OF STATE & COLORADO COUNTY CLERKS ASSOCIATION (SOS AND CCCA)

• SOS conducts required annual trainings for security (cyber and physical) for Colorado counties.
• SOS hosts statewide EPIC events (Elections Preparedness for Infrastructure and Cybersecurity) to simulate cybersecurity incident scenarios.
• CCCA’s biannual conferences include national experts and agencies to inform and train counties on best practices.

NATIONAL RESOURCES AND PARTNERSHIPS

• **Cybersecurity and Infrastructure Security Agency** (CISA) (under the U.S. Department of Homeland Security) provides cyber and physical security assessments and shares information regarding threat alerts, detection, and mitigation. In 2019 and 2020, CISA conducted cybersecurity response tabletop exercises to improve how local, state, national agencies identify and report security issues.

• **Elections Infrastructure Information Sharing and Analysis Center** (EI-ISAC): Boulder County, as well as every other Colorado county, are members of EI-ISAC, which facilitates organized communication about real and perceived threats across the country and provides cybersecurity assessment and guidance regarding mitigation best practices.
The Colorado Election Model and our strategic partnerships have laid the groundwork for Colorado’s status as a national leader in election security. However, our excellence in election security has also been the result of a program we created to address the specific needs of Boulder County. We carefully designed this tailored cybersecurity program based on a 2017 risk assessment and guidance from Rule4, the Cybersecurity and Infrastructure Security Agency, the National Institute of Standards and Technology, and the Colorado Secretary of State’s Office.

Our cybersecurity program aims to improve Boulder County Elections’ cybersecurity posture. This means continuously evaluating our organization’s overall defense against possible cyber-attacks and implementing process and technology recommendations (from national, state, local partners, etc.) that help make our systems and information more secure. We do this by evaluating potential improvements against our Operational Guiding Principles and through a lens of a Risk Mitigation Approach.

**OPERATIONAL GUIDING PRINCIPLES**

- Ensure the ability to operate and deliver elections in support of county, state, and national interests
- Ensure Boulder County Clerk & Recorder’s Office (BCCR) is appropriately positioned to withstand efforts to degrade its ability to meet its elections-related mandate
- Implement information security and privacy programs to include not only the protection of county data and systems, but also the appropriate preservation of personal privacy
- Strive to be a responsible steward of resources and citizens’ data while balancing technological complexities and requirements
Create and maintain an internal cybersecurity technology infrastructure, organization, and program that ensures the following is maintained for information assets:

» **Confidentiality** – Ensuring that information is accessible only to authorized users

» **Integrity** – Safeguarding the accuracy and completeness of information and information-processing methods

» **Availability** – Making information assets available to authorized users when they need them

Develop operating models and controls that can be leveraged by and benefit the broader Boulder County government as a whole

Build a collaborative and forward-looking approach to cybersecurity within Boulder County Clerk & Recorder and between other county departments

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**RISK MITIGATION APPROACH**

Boulder County Elections uses the [National Institute of Standards and Technology (NIST) Cybersecurity Framework](https://nist.gov/cyberframework), designed for critical operations such as elections. This framework provides a “risk mitigation approach” to planning and operations. It is:

- Recommended by the Department of Homeland Security and other agencies focused on election cybersecurity
- Provides a common language that allows staff to develop a shared understanding of cybersecurity risks and mitigations
- Recognized as a strong and flexible framework that can leverage appropriate technical control standards such as NIST 800-53
- Provides key areas for program consideration, but provides flexibility for users to adapt their own unique approach
BOULDER COUNTY RISKS AND MITIGATION PROGRAMS

Taking into consideration the results of risk assessment activities and the NIST framework, we have identified the following risks and developed comprehensive mitigation strategies and projects to improve our cybersecurity posture.

<table>
<thead>
<tr>
<th>Primary Risks or Area</th>
<th>Boulder County Elections Key Risk Mitigation Strategies &amp; Projects</th>
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<tbody>
<tr>
<td><strong>Awareness and Culture</strong></td>
<td>• Created and enacted Elections Cybersecurity Policy, with annual staff renewal required (signed agreements of understanding by every staff member)</td>
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<td></td>
<td>• Continuous cybersecurity awareness training and briefings in partnership with IT</td>
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<td>• Subscription to DHS, NIST, and other cybersecurity agency threat alerts</td>
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<td>• Cybersecurity incident response exercises with Colorado SOS and CISA – including EPIC, a statewide tabletop exercise</td>
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<td>• Cybersecurity consulting firm Rule4 on retainer to provide risk mitigation expertise and incident response support</td>
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<td>• Periodic phishing tests with incident reporting protocol</td>
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<td>• Frequent community outreach efforts and education campaigns, including community briefings</td>
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<td>• Background checks prior to hiring</td>
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<td><strong>Equipment and Data Management</strong></td>
<td>• Operationalize control practices related to configuration management, patch, and upgrades scheduling</td>
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<td></td>
<td>• Maintain data inventory to ensure proper backups, controls, access, and handling</td>
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<td></td>
<td>• Procedures and reviews to ensure appropriate levels of confidentiality, accessibility, and integrity</td>
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<td></td>
<td>• Limited data access and recurring data access reviews</td>
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<td></td>
<td>• Multi-factor user authentication (MFA) for key applications</td>
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<td></td>
<td>• Password ‘vault’ to secure elections application user credentials</td>
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<td></td>
<td>• Enhanced protocols for sensitive data management and user access privileges</td>
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<tr>
<td>Primary Risks or Area</td>
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<tr>
<td><strong>External Threat Mitigation</strong></td>
<td>• Application penetration testing and vulnerability scanning&lt;br&gt;• Intrusion detection and monitoring&lt;br&gt;• Malware detection and anti-virus protections&lt;br&gt;• Multiple technology defenses implemented inside and outside county network perimeter&lt;br&gt;• Intrusion detection and monitoring in partnership with CISA and Center for Internet Security</td>
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<tr>
<td><strong>Incident Response Protocols</strong></td>
<td>• Institutionalize and practice protocols, internally and with other agencies engaged in elections, to maintain operational accessibility&lt;br&gt;• Cybersecurity Incident Response Protocol, continuously tested through tabletop exercises with external partners, county elections, and IT leadership</td>
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<tr>
<td><strong>Contingency and Recovery Plans</strong></td>
<td>• Maintain understanding of points of failure and adopt appropriate contingencies that ensure operational recoverability and accessibility</td>
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As a voter, you have an important role to play in safeguarding Colorado’s standing as a national leader in election security. To ensure the continued security of our elections, make sure to do the following:

**Update Your Voter Registration**
To ensure that you receive your mail ballot at your current address, please periodically verify that your address is correct by going to [www.GoVoteColorado.gov](http://www.GoVoteColorado.gov). You must update your voter registration every time you move. And don’t be afraid to remind a friend or loved one about making sure their registration is up-to-date!

**Include an Email Address With Your Registration**
Your email is considered confidential and is not part of the public record. We will only email you a handful of times during each election period with key dates and reminders. Additionally, your email allows us to easily contact you in emergency situations, such as if we are unable to verify your signature on your ballot envelope.

**Track Your Ballot**
Sign up for [Ballot Track](http://www.BoulderCountyVotes.org) to ensure receipt and acceptance of your ballot envelope. This free service provided by i3Logix will notify you by text, email, or phone message when your ballot is mailed to you and when it is received by Boulder County for processing.

**Know When Elections Are Held**
If an election is approaching, visit our website [www.BoulderCountyVotes.org](http://www.BoulderCountyVotes.org) for upcoming dates and details. In Boulder County, ballots are mailed approximately three weeks before Election Day. If your ballot does not arrive two weeks before Election Day, please contact our office to request a replacement ballot. We will send you a new ballot and void the original ballot mailed to you.
Vote Your Ballot Clearly and Follow All Instructions

Be sure to follow the instructions that arrive with your ballot and mark your ballot clearly. If your intent is not clear, a bipartisan election judge team will need to review your ballot and attempt to decipher your intention.

Sign Your Mail Ballot Envelope

Your signature is required to confirm your identity. If you do not sign your ballot envelope, your vote may not count. While we do follow-up by mail (and email, if one was provided) when a voter forgets to sign their envelope or when the signature does not match the signature(s) we have on file, we cannot count your ballot if you do not respond to our follow-up.

Make Sure Your Ballot Is Returned Securely

Whenever possible, personally drop off your ballot at a secure location (USPS mailbox, 24-hour ballot drop box, or Vote Center). If you need assistance, have someone you trust drop off your ballot.

Know Your Rights & That Your Vote Matters

If you are in line at a Vote Center by 7:00 p.m. on election night, election judges must allow you to vote. Regardless of what you may hear or read in the media, contests are never decided before polls close on election night. Make sure you vote!

Know Our Webpage

Malicious actors may try to mimic our website in order to disseminate false information and/or election results. Make sure you go to our exact web address for correct information. Our website short name is www.BoulderCountyVotes.org, which we own. This URL immediately redirects to its county landing page of www.BoulderCounty.org/Elections.

Be a Savvy News Consumer

When you consume news or social media, know the origins of the stories. Are the stories about events in Colorado or another state? What type of election model does that state or area have? What election and voter safeguards are in place? If claims are about fraud or hacking, what are the details? And are any credible election administrators or other experts being quoted? What makes them an expert? Ask critical questions and don’t share news stories or social media posts that you cannot verify. We know some citizens have lost faith in the elections process. Let’s restore it when possible. And don’t hesitate to contact our office when in doubt or if you need help!

Vote!

It is your right and your responsibility. Malicious actors win if people do not vote!
We hope this Briefing Report has been helpful in learning more about Boulder County Elections’ cybersecurity approach.

Our office also knows that we cannot sacrifice physical security along the way to a more robust cybersecurity posture. A few highlights of our physical security standards include:

✓ Video surveillance of all ballot processing operations.
✓ Access points that require badged entry – and permissions granted only for what is deemed necessary to that individual.
✓ Locked cages that store ballots and other critical pieces of equipment, with badged-access by a limited number of personnel.
✓ Redundancies throughout the process to create a rigorous and documented path for securing equipment and ballots.

Additionally, we take great efforts in other processes to minimize the risk of disruptions in the voting process. Because Colorado is a mail-ballot state, one of the biggest risks falls on ballot printing and mailing. To minimize the risk of disruption, our staff spends multiple days at our print vendor to conduct quality control testing.* The purpose of this testing is to ensure that issues are detected and rectified early on before they would otherwise reach the voter. This work is conducted at the printer prior to further testing of the ballots at our office through the voting system equipment.

A few highlights of our ballot printing quality control processes include:

✓ Confirming print quality from the press to ensure the ink has fully adhered to the paper to minimize the risk of smudging and runs.
Ensuring that the ballot image is lined up properly by using a see-through mylar overlay to inspect every portion of the ballot. This confirms that all the text and target areas are where they should be.

Reviewing the fold lines from the folding machine to ensure that the folds do not run through a target area.

Conducting a second review of the file upload to the print vendor to confirm the correct ballot styles are being printed.

At Boulder County Elections, we are proud of the rigorous processes we have created to ensure integrity, accuracy, accessibility, and security in our operations. Our staff has shown resiliency in adapting to the changing demands of the pandemic and planning accordingly. And our office is committed to continuously making improvements to our processes and implementing more efficiencies and streamlined steps whenever possible.

We wanted to move forward with publishing this briefing as we know the national COVID-19 crisis likely raises even more questions around election security, mail ballot voting, and how we will be conducting the General Election safely.

With the recent news swirling around potential policy and procedural changes at the U.S. Postal Service, know that our office has always worked closely with our local USPS officials for timely and efficient ballot delivery. In August, we issued a press statement on the matter. We will be monitoring the situation closely and will continue to work with our colleagues at USPS to ensure prompt delivery of mail ballots for the November General Election.

While we normally conduct in-person ballot processing tours and multiple community presentations before each election, for safety considerations, we are not able to offer all the same opportunities to the public this fall. However, we will be hosting at least one live online community presentation before the upcoming General Election, including the latest information on what we are doing to keep voters, election judges, and our staff as safe as possible during the pandemic (check our website or update your voter registration with an email address for an invite). You can also watch previously recorded ballot processing tours and community presentations on our YouTube channel. Additionally, we will be posting updates on our social media channels about how we are handling ballot processing under the added safety protocols that the situation demands and will of course update the public if we ever need to close or open new voting locations due to the threat of COVID-19.

Lastly, thank you for reviewing this report. We hope knowing more about the Colorado Election Model and Boulder County’s cybersecurity approach fills you with added confidence about casting your vote safely and securely in Boulder County.

Thank you for your interest and commitment to our elections process.

* Due to COVID-19, we had to get creative on how to maintain our high standards of ballot printing quality control. Luckily, we have a great print vendor who worked with us to make sure we could still conduct many of these same quality assurance tests while remote and over camera!