

14 October 2021

Missoula Board of County Commissioners  
200 W. Broadway  
Missoula, MT 59802

Re: Missoula County Elections Office, Ballot Tabulators

Honorable Commissioners Strohmaier, Slotnick, and Vero –

Thank you for the opportunity to comment on tabulation practices and proposed equipment purchases in Missoula County. As members of the Missoula County Election Advisory Committee, we take seriously our role as a public liaison between County residents and elected officials, and as advocates for fair, robust, trustworthy, and inclusive elections. Advisory committees like ours are unique in the world of elections administration – a demonstration of the County's commitment to civic participation and democratic equity. It is in our advisory capacity, therefore, that we offer advice and the following recommendations:

1. It is our recommendation that **Missoula County transition from precinct-based ballot tabulation to a central count process**
2. The budget that could be applied to the purchase of new DS200 precinct level tabulators should instead be directed towards **election outreach and inclusion practices** as well as other election office priorities

Fundamentally, elections in the United States are administered in a decentralized manner. This means each election jurisdiction<sup>1</sup> is responsible for myriad elements of the electoral process<sup>2</sup>: from maintaining voter registration rolls to designing election ballots, from securing and staffing polling places to conducting ballot tabulation, and from reporting the ultimate victors in electoral contests to performing post-election audits, and more. Vested within local election officials in Montana is the authority to determine the equipment<sup>3</sup> and structure used for ballot tabulation.

Ballot tabulation can be conducted via a central count or precinct count process. Missoula County's existing in-person (polling place) tabulation process takes place in the same precinct where the ballot is cast. A voter who casts their ballot at their polling place then feeds their voted ballot into tabulator on site. Precinct-based ballot tabulators can be programmed to provide a voter information on blank, overvoted, and undervoted ballots. By contrast, in central count systems, a voter who casts their ballot at a polling place then deposits their voted ballot into a secure

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<sup>1</sup> In the case of Montana, an election jurisdiction can be thought of as a county.

<sup>2</sup> Local elections function within a framework of state and national law.

<sup>3</sup> The Montana Secretary of State has certified the following ballot tabulators for use in the state (all ES&S): Model 650, DS850, DS450, Model 100, DS200 (see <https://sosmt.gov/wp-content/uploads/Voting-Systems-and-Components-Certified-for-Use-in-Montana.pdf> for details).

ballot box which is transported, once the polls close, to the central count location where it is tabulated.

**Eighty-five percent of Missoula County voters' ballots currently follow the central count process** as this is how absentee/mail ballots are tabulated.

Any time election procedures are changed, consideration must be given to public confidence and voter acceptance<sup>4</sup>. Thankfully, Missoula County voters are confident their vote counts (91 percent), their vote by mail is counted (87 percent), and that election results are accurate (80 percent)<sup>5</sup>. Although transitioning to a central count process will introduce a change in election procedures and the voter experience at polling places, it is important to note that Missoula County, like election jurisdictions across the country, has experienced a decline in the number of individuals voting in-person over the last decade. Between 2016 and 2018, the last two federal election cycles that utilized precinct polling places, 25.7 percent fewer voters<sup>6</sup> utilized in-person polling. The decline in voter use of precinct polling places, substantial level of voter confidence, and high rate of mail ballot use in Missoula County lead us to believe that a change from precinct-based ballot tabulation to central count will neither unduly jeopardize the democratic process nor present an undue burden to voters.

Finally, it is important to note that we, as the Missoula Election Advisory Committee, do not believe that cost should be a determinative factor when considering access to and confidence in the American democratic process. In arriving at our position on this issue, we discussed the justifications for various courses of action and have attempted to balance our passions for representative and inclusive democracy with our responsibility to our friends and neighbors for the stewardship of their tax dollars. Rather than allocate monies to the purchase of new precinct ballot tabulation equipment, we urge the Commission to consider investing in vital civic engagement, outreach, and inclusion activities.

In sum, we encourage Missoula County follow the lead of other populous counties in Montana<sup>7</sup>, and transition to a central count ballot tabulation process.

Humbly,

Missoula County Election Advisory Committee

Christina S. Barsky, Ph.D., Chair

Travis Hoffman, Vice Chair

Shibu Arens

Susan Favro

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Amber Shaffer

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<sup>4</sup> The U.S. Election Assistance Commission has offered insight on this topic:

[https://www.eac.gov/sites/default/files/document\\_library/files/Quick\\_Start\\_Guide\\_-\\_Central\\_Count\\_Optical\\_Scan\\_Ballots.pdf](https://www.eac.gov/sites/default/files/document_library/files/Quick_Start_Guide_-_Central_Count_Optical_Scan_Ballots.pdf)

<sup>5</sup> 2020 Missoula County General Election Experience: <https://www.umt.edu/bigskypoll/community-projects/mc-election-final-report1.8.21.pdf>.

<sup>6</sup> See Missoula County Election Director 12 October 2021 EAC presentation.

<sup>7</sup> For instance, Yellowstone and Gallatin Counties.