

June 14, 2013

To: Judd Choate
Director of Elections
Fm: Jack Arrowsmith
Douglas County Clerk and Recorder

Re: Certification Program

I appreciate the opportunity to comment on the proposed changes to the SOS election certification program. It makes good sense to evaluate this program on a regular basis and while I endorse the concept, I would have some questions and concerns about the current direction.

When redesigning any program, the first step is to determine what you intend to accomplish or if the current program is not working, what problem are you trying to solve. Can you explain what the new direction for the certification program intends to solve? Without knowing this, it is difficult to determine if this represents a positive change or not.

I agree that the current program has real deficiencies and here are my concerns about the current program:

1. The Secretary of State held trainings at the (2) clerks conferences and this was an opportunity to save travel dollars by getting training at the same time as the conference. For the last few years this has not been the case and so has dramatically limited training opportunities. Will this new program have training opportunities at Clerk's Conferences?
2. Several years ago we were told that "all" training would be available on-line. I think there may be only seven courses available on line at the current time. What is the plan to develop the on-line courses?
3. On-line training and designing programs has become a very specialized process, particularly if the training is going to be effective and compelling. Who at the Secretary of State has these design and implementation skills for on-line training?
4. Moving to a new on-line format was to solve several of the problems with the old (very clunky) on-line system. While the format is somewhat improved, it still continues to have drawbacks. The clerk is responsible to make sure that the election staff is certified, yet there is no way to monitor this process. Where is the administrative function? The old system was able to produce transcripts (as required on the certification form) yet if this function exists, I am unable to find it.
5. For many years I have suggested that the Secretary of State host training on Title One. This could best be handled with a live webinar. Will this new program include live webinars and will the Secretary of State have a modern and well functioning webinar tool?

6. The current program has determined that training should end in June for the current election year. While I understand the thought that if people take classes (particularly in December) they lose value for that election year. However many folks take classes at night or weekends due to time constraints. I think sometimes a "just in time" training program might be more valuable and have merit. Why not have classes on watchers, signature verification and others just prior to the activity itself. This might have more value than a class taken in May that gets applied in October and November.

In addition, I have questions about the proposed new format:

1. The new format seems to require at-least one class be taken face-to-face. This appears to add additional (unfunded) costs and I am not sure what benefit will be provided? Unless the face-to-face training provides real hands-on benefits, what would be the rationale for mandating a face-to-face program?
2. The new certification program restricts credit from any outside training. I would certainly need to know the rationale for this aspect of the program. The Election Center has been the Gold Standard for election training featuring professors from Auburn University and many years of program design and development. Why not take advantage of these programs, while perhaps not Colorado specific, I have found the programs to be outstanding. In addition, several weeks ago, Douglas County held a three-day eight hour per day training boot camp on Hart equipment. We brought in a Hart trainer and the training was outstanding. This is the equipment used in some 46 of Colorado's 64 counties. The last Hart specific training I had from the SOS for Hart equipment was several years ago and included NO hands on experience. Why would training like that hosted by Douglas County NOT count towards certification? Will the SOS be prepared to do this type of training for the three vendors used in Colorado?

As stated previously, I think this is a wonderful opportunity to evaluate the Secretary of State's certification program and I for one am in favor of change. Having said that, prior to launching this new format, it seems that more details should be provided about what problem the SOS is trying to solve? The current program seems deficient in several areas and building infrastructure and personnel seems prudent prior to launching a new program.

Respectfully,
Jack Arrowsmith
Douglas County Clerk and Recorder