



June 21, 2013

Sent via email (SoSRulemaking@sos.state.co.us)
Secretary of State Scott Gessler
1700 Broadway, Suite 250
Denver, CO 80290

Dear Secretary Gessler:

Please accept the following as written testimony on behalf of the Jefferson County Clerk and Recorder's Office regarding proposed amendments to Secretary of State Election Rule 40 concerning certification and education of designated election officials.

Overall, it is our feeling that the proposed changes to Rule 40 effectively modernize the rule and bring it into alignment with current process and training. However, the proposed introduction of new rule 40.5.4 and the proposed deletion of rule 40.6 are a cause of concern.

The proposed changes referenced above effectively eliminate the use of training offered by organizations other than the Secretary of State's Office towards Colorado election official certification credit. The education programs offered by the Secretary of State's Office are a valuable resource to local election officials and provide a convenient and efficient training opportunity. With the improvement and growth in the number of training opportunities offered by your office over the last several years, I can strongly endorse the State's accomplishment in developing a comprehensive certification program.

However, this education program is not the only valuable resource available to designated election officials. There are courses offered by outside organizations, such as the Elections Center, that are of great value to election officials. In many cases, these outside courses require a larger commitment of time and resources than the courses offered by the Secretary of State's Office. It is our opinion that the value of attending these outside courses is certainly high enough to warrant credit under the Colorado election official certification program and should be considered as complementary and an efficient way for the state to take advantage of expanding the diversity of the curriculum. It also presents an opportunity for Colorado election administrators to share best practices and concepts and I believe has contributed to Colorado remaining on the forefront of innovation and excellence.

Pam Anderson
CLERK AND RECORDER

Lori Webb
CHIEF DEPUTY

Joshua B. Liss
DEPUTY OF ELECTIONS

Teri Schmaedecke
CLERK TO THE BOARD

Susie Swain
DIRECTOR OF RECORDING

Sharon Carnefix
DIRECTOR OF MOTOR
VEHICLE

Further, existing rule 40.6 provided a mechanism for application for credit and review by the Election Official Certification Advisory Board to determine whether training provided by outside sources merits certification credit. This is a good process that allows for thorough review of each individual circumstance by both Secretary of State staff and county clerks represented on the Advisory Board. We feel this rule should remain intact.

The Jefferson County Clerk and Recorder's Office respectfully requests that your office leave current rule 40.6 intact as it is currently written and choose not to adopt proposed rule 40.5.4 so that Colorado certification credit can be given for outside election training programs when determined appropriate by the Advisory Board. Thank you for your consideration of this written testimony.

Sincerely,

A handwritten signature in cursive script, appearing to read "Pam Anderson".

Pam Anderson
Jefferson County Clerk and Recorder