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To: [SoS Rulemaking](#)
Cc: [Crystal Richards](#)
Subject: Rule Comments - Kit Carson County
Date: Monday, August 6, 2018 2:43:19 PM

Amendments to Rule 19.3.4 concerning curriculum:

19.3.4 To maintain Colorado certification, a person must complete at least five Continuing Elections Education courses by July 31 of every ~~even~~ year AND COMPLETE AT LEAST ONE IN-PERSON CLASS EVERY FOUR YEARS.

We have concern with the change in 19.3.4 and the time required for all of the trainings in the small county offices. The staff members that are in Elections the most do attend in person trainings. In the past, the entire staff is certified so that they can help during the final days and hours of each election cycle. In my office, this would include the staff that have their duties in Recording, Driver License, and Motor Vehicle. It is important that they understand and are trained/certified to participate in elections but sending them for in person training even once every four years is above what their main focus is in the office. I would have to consider changing the certification of staff members and having some staff members be trained as election judges only, if that would be allowed. Unfortunately, that is not how the team work in our office is designed.

It is important to me that one or two of my staff (a deputy clerk of elections & an assistant) attend the in person classes every year to stay really train in their field, to allow myself and these individuals time to attend training the remaining four staff members keep the office running. This year has taken its toll on customer service and staff moral with all of the required trainings, which has left offices short staffed. Training is extremely important but I really don't see a problem with the current rule.

Amendments to Rule 21.4.5 (e)

The voting system must include hardware or software to enable the closing of all 15 vote tabulation devices at polling locations to allow for the following:

Will the results of the election be printable? Or does this mean that the report can be run if the polling places were not closed?

We also have some concern on the rules for Ranking but do not consider it a high concern at this time because we don't see any of our municipalities using it. Will be interested in future discussions on this topic though.

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