



April 7, 2020

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Dear Governor Kemp and Secretary Raffensperger:

Advancement Project National Office and New Georgia Project write to express our concern about the impact of the coronavirus, or COVID-19, pandemic on the upcoming primary election on Tuesday, May 19, 2020.

We understand that Georgia officials are working hard to ensure that citizens are protected and that voters can safely and securely cast their ballots in this election. We also recognize the tireless efforts of the county election boards, supervisors, registrars, and their staff to adjust to the rapidly evolving reality, recruit additional poll workers, and implement measures at polling places to create healthy and safe environments conducive to the vital act of American democracy: voting.

You must act to ensure that all Georgians affected by COVID-19, including persons who are under quarantine order or self-quarantined, and those especially vulnerable to COVID-19, such as elderly persons, have real opportunities to cast their ballots. This national and state emergency requires that you make immediate adjustments to Georgia's normal election procedures for casting ballots in its 2020 elections. We believe that the measures described in this letter provide for the free, safe and nondiscriminatory exercise of the right to vote. Public health and safety are paramount, and Georgians must not be forced to choose between their health and their stake in American self-government through democratic elections.

### **The May Primary Election**

In Georgia's 2020 primary elections, citizens may vote by several mechanisms. All Georgians may vote in person at their polling place on Election Day, vote early at advance voting locations, or vote absentee by mail. Election Day, originally set for Tuesday, March 24, is now Tuesday, May 19, 2020.

### **The Coronavirus Emergency**

However, the extraordinary public health emergency caused by the coronavirus pandemic threatens each of these ordinary voting mechanisms.

On December 1, 2019, the first confirmed COVID-19 patient began experiencing symptoms in China’s Hubei province.<sup>1</sup> The novel coronavirus infection rapidly spread to other countries. By January 21, the Centers for Disease Control and Prevention (CDC) confirmed the first patient in the United States.<sup>2</sup> It has since led to at least 330,891 confirmed U.S. cases in all 50 states, the District of Columbia, Puerto Rico, Guam, the Northern Mariana Islands, and the U.S. Virgin Islands.<sup>3</sup> We understand that the number of actual cases is likely far higher because the sluggish and inadequate federal response has hampered effective testing procedures. Thus far, the outbreak has led to 8,910 deaths in the United States.<sup>4</sup> On Friday, March 13, President Trump declared a national emergency to begin mobilizing the extraordinary measures necessary to address the rapidly expanding public health crisis.<sup>5</sup>

By now, the outbreak has spread to every corner of Georgia. As of today, the Georgia Department of Public Health has confirmed 8,818 cases among Georgians.<sup>6</sup> For the same reasons cited above, the true number may well be much higher. 329 Georgians have died from COVID-19.<sup>7</sup> On Saturday, March 14, Secretary Raffensperger announced the postponement of the scheduled presidential preference primary election from Tuesday, March 24, to Tuesday, May 19, to coincide with the other primary elections taking place on that date, citing concerns about COVID-19.<sup>8</sup> Effective the same day, Governor Kemp declared Georgia’s first-ever public health emergency due to the rapid spread of the disease.<sup>9</sup> On April 1, Secretary Raffensperger raised the idea of further postponement to June or July in a public statement.<sup>10</sup> The Fulton County Board of Health has issued an order directing residents to stay at home except for defined essential activities and limited gatherings across living units to those essential activities.<sup>11</sup> Gwinnett County also ordered residents to stay at home with limited activity exceptions and ordered all non-essential

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<sup>1</sup> Fernando Duarte, “Who Is ‘Patient Zero’ in the Coronavirus Outbreak,” BBC (Feb. 23, 2020) (online at [www.bbc.com/future/article/20200221-coronavirus-the-harmful-hunt-for-covid-19s-patient-zero](http://www.bbc.com/future/article/20200221-coronavirus-the-harmful-hunt-for-covid-19s-patient-zero)).

<sup>2</sup> Elizabeth Cohen, “First US Case of Wuhan Coronavirus Confirmed by CDC,” CNN (Jan. 21, 2020) (online at [www.cnn.com/2020/01/21/health/wuhan-coronavirus-first-us-case-cdc-bn/index.html](http://www.cnn.com/2020/01/21/health/wuhan-coronavirus-first-us-case-cdc-bn/index.html)).

<sup>3</sup> “Coronavirus Disease 2019 (COVID-19) in the U.S.,” Centers for Disease Control and Prevention (updated Apr. 6, 2020) (online at [www.cdc.gov/coronavirus/2019-ncov/cases-in-us.html](http://www.cdc.gov/coronavirus/2019-ncov/cases-in-us.html)).

<sup>4</sup> “Coronavirus Disease 2019 (COVID-19) in the U.S.,” Centers for Disease Control and Prevention (updated Apr. 6, 2020) (online at [www.cdc.gov/coronavirus/2019-ncov/cases-in-us.html](http://www.cdc.gov/coronavirus/2019-ncov/cases-in-us.html)).

<sup>5</sup> “Transcript: Trump’s Coronavirus News Conference,” New York Times (Mar. 13, 2020) (online at [www.nytimes.com/2020/03/13/us/politics/trump-coronavirus-news-conference.html](http://www.nytimes.com/2020/03/13/us/politics/trump-coronavirus-news-conference.html)).

<sup>6</sup> “COVID-19 Daily Status Report,” Georgia Department of Public Health (updated Apr. 7, 2020) (online at [dph.georgia.gov/covid-19-daily-status-report](http://dph.georgia.gov/covid-19-daily-status-report)).

<sup>7</sup> *Id.*

<sup>8</sup> “Secretary of State Raffensperger Postpones the Presidential Preference Primary,” Georgia Secretary of State (Mar. 14, 2020) (online at [sos.ga.gov/index.php/elections/secretary\\_of\\_state\\_raffensperger\\_postpones\\_the\\_presidential\\_preference\\_primary](http://sos.ga.gov/index.php/elections/secretary_of_state_raffensperger_postpones_the_presidential_preference_primary)).

<sup>9</sup> “Kemp: Public Health Emergency in Georgia Effective March 14, 2020,” Office of the Governor of Georgia (Mar. 16, 2020) (online at [gov.georgia.gov/press-releases/2020-03-16/kemp-public-health-emergency-georgia-effective-march-14-2020](http://gov.georgia.gov/press-releases/2020-03-16/kemp-public-health-emergency-georgia-effective-march-14-2020)).

<sup>10</sup> “Statement of Secretary of State Brad Raffensperger Regarding the Upcoming May 19th Primary,” Georgia Secretary of State (online at [sos.ga.gov/index.php/elections/statement\\_from\\_secretary\\_of\\_state\\_brad\\_raffensperger\\_regarding\\_the\\_upcoming\\_may\\_19th\\_primary2](http://sos.ga.gov/index.php/elections/statement_from_secretary_of_state_brad_raffensperger_regarding_the_upcoming_may_19th_primary2)).

<sup>11</sup> <http://fultoncountyboh.org/boh/media/attachments/2020/04/01/20.03.31.-fulton-county-boh-administrative-order.pdf>

businesses to close Gwinnett county facilities.<sup>12</sup> On April 2, Governor Kemp announced a ten-day shelter-in-place order from April 3 to April 13.<sup>13</sup>

Even with the postponement of the presidential primary election from March to May, the ongoing COVID-19 emergency will disrupt the normal functioning of this election.

The implications for in-person voting are clear. 66% of people surveyed by Pew Research Center between March 19<sup>th</sup> and 24<sup>th</sup> stated that they would feel uncomfortable going to a polling place to vote in the current coronavirus outbreak.<sup>14</sup> Nationally, the CDC discourages gatherings of 10 people or more, particularly groups that include people at higher risk of serious COVID-19 illness.<sup>15</sup> The CDC further recommends that voters use methods like mail-in ballots, drive-up voting, and early voting in smaller crowds rather than go to crowded Election Day polling places.<sup>16</sup>

We also understand that numerous poll workers have withdrawn and more will almost certainly continue to withdraw from participating in this election due to concerns about the pandemic. For elderly Americans, COVID-19 is especially dangerous, and the average Georgia poll worker is 70 years old.<sup>17</sup> Since Florida conducted its scheduled March 17 presidential preference primary, several poll workers who reported for duty in that election have tested positive for COVID-19.<sup>18</sup> With a lack of poll workers, county elections officials may be forced to close or consolidate more polling places. This will necessarily hinder voters' ability to access voting sites within reasonable distances of their homes and will create confusion. Polling places that remain open with fewer poll workers may experience longer lines with wait times for voters, increasing the coronavirus transmission risks associated with large groups of people in public spaces. If Georgia, too, deploys National Guard or volunteers from other government departments to fill vacant poll worker positions, those not fully trained in election law, rules, and procedures may disseminate inaccurate information to voters or wrongfully turn away eligible voters from the polls.

Yet, absentee voting by mail cannot be a one-size-fits-all solution for all Georgians. Secretary Raffensperger acknowledged this in his statement on March 24, citing research showing the possibly disproportionate impacts on communities of color and young voters of all-mail voting, and identifying some of our neighbors and fellow Georgians for whom voting in person must remain an option: "People without internet or mail access, such as those experiencing homelessness; Georgians who need language assistance; and people with disabilities who rely on

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<sup>12</sup> <https://www.gwinnettcountry.com/static/departments/boc/pdf/Local%20Emergency%20Order%201-4%203%2027%2020.pdf>

<sup>13</sup> "Governor Kemp Issues Shelter in Place Order," Office of the Governor of Georgia (Apr. 2, 2020) (online at [gov.georgia.gov/press-releases/2020-04-02/governor-kemp-issues-shelter-place-order](http://gov.georgia.gov/press-releases/2020-04-02/governor-kemp-issues-shelter-place-order)).

<sup>14</sup> [https://www.pewsocialtrends.org/2020/03/30/most-americans-say-coronavirus-outbreak-has-impacted-their-lives/psdt\\_03-30-20\\_covid-impact-00-11/](https://www.pewsocialtrends.org/2020/03/30/most-americans-say-coronavirus-outbreak-has-impacted-their-lives/psdt_03-30-20_covid-impact-00-11/)

<sup>15</sup> <https://www.cdc.gov/coronavirus/2019-ncov/community/large-events/index.html>

<sup>16</sup> <https://www.cdc.gov/coronavirus/2019-ncov/community/election-polling-locations.html>

<sup>17</sup> "Editorial: Postponed presidential primary comes with fallout for Georgians," Savannah Morning News (Mar. 18, 2020) (online at [www.savannahnow.com/opinion/20200318/editorial-postponed-presidential-primary-comes-with-fallout-for-georgians](http://www.savannahnow.com/opinion/20200318/editorial-postponed-presidential-primary-comes-with-fallout-for-georgians)).

<sup>18</sup> "Florida held its primary despite coronavirus. Two Broward poll workers tested positive," Miami Herald (Mar. 27, 2020) (online at [www.miamiherald.com/news/politics-government/article241539451.html](http://www.miamiherald.com/news/politics-government/article241539451.html))

voting machines to cast their ballot.”<sup>19</sup> Even for those who will be forced by present circumstances to vote absentee by mail because of legitimate fear for their health and life, Georgia’s current requirements may prove unnecessarily burdensome—how is one supposed to acquire postage under a stay at home order, for example?

In previous times of natural disaster, federal judges have required states to mitigate the disruption caused by emergencies on the normal functioning of elections to ensure voters’ opportunity to cast a ballot.<sup>20</sup> In one case involving extension of the voter registration deadline in Chatham County after Hurricane Matthew, a court stated: “An individual’s ability to participate in local and national elections is arguably the most cherished right enshrined in our constitution. Indeed, our [nation’s founders] felt so strongly about their right to participate in the electoral process that when deprived of it they took up arms against their sovereign, risking life and home for over eight years, to obtain that right.”<sup>21</sup> In weighing the burden on election officials to extend the voter registration deadline versus the burden on impacted voters, the court concluded “those administrative hurdles pale in comparison to the physical, emotional, and financial strain Chatham County residents faced in the aftermath of Hurricane Matthew.”<sup>22</sup> As a result of the extension, over 1,410 Chatham County residents were able to register to vote.<sup>23</sup>

We are living in uncertain times, with increasing risks to Georgians’ health, including the possibility of death. There is a heightened risk for the elderly and people with compromised immune systems. We must simultaneously protect Georgians’ health and their right to vote. We cannot overstate how much a refusal to adopt any mitigating measures proportionate and responsive to this pandemic could disrupt voters’ access and burden their fundamental right to vote. Georgians deserve to have their voices heard this election. They deserve a smooth election process to ensure they can cast a ballot, but to ensure that citizens have a voice on Election Day, it is imperative that you provide voters with an array of options to cast their ballots suited to match the crisis we are living through.

### **Emergency Measures to Ensure Access to Voting**

In order to make voting accessible, safe, and healthy for all Georgians impacted by the coronavirus pandemic, we demand that in your respective capacities, as Governor of Georgia and Secretary of State, you take whatever steps are necessary to implement these suggested measures on a statewide basis and direct all county election boards, superintendents, and registrars to make

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<sup>19</sup> “Raffensperger Takes Unprecedented Steps to Protect Safety and Voter Integrity in Georgia,” Georgia Secretary of State (Mar. 24, 2020) (online at [sos.ga.gov/index.php/elections/raffensperger\\_takes\\_unprecedented\\_steps\\_to\\_protect\\_safety\\_and\\_voter\\_integrity\\_in\\_georgia](https://sos.ga.gov/index.php/elections/raffensperger_takes_unprecedented_steps_to_protect_safety_and_voter_integrity_in_georgia)).

<sup>20</sup> *Georgia Coal. for the Peoples’ Agenda, Inc. v. Deal*, 214 F. Supp. 3d 1344 (S.D. Ga. 2016); *Florida Democratic Party v. Scott*, 215 F.Supp.3d 1250 (N.D. Fla 2016).

<sup>21</sup> *Georgia Coal. for the Peoples’ Agenda*, 214 F. Supp. 3d at 1345–46.

<sup>22</sup> *Id.*

<sup>23</sup> Kristina Torres, “1,400 added to Georgia’s voter rolls during registration extension,” *The Atlanta Journal-Constitution* (Nov. 3, 2016) (online at [www.ajc.com/news/state--regional-govt--politics/400-added-georgia-voter-rolls-during-registration-extension/BXykmbGJufv3dqZ2YSmS5M/](http://www.ajc.com/news/state--regional-govt--politics/400-added-georgia-voter-rolls-during-registration-extension/BXykmbGJufv3dqZ2YSmS5M/)).

adjustments as needed in their respective counties to ensure that voters are accommodated in the ways described in detail below.

Governor Kemp’s declaration of a state of emergency unlocks certain extraordinary and rare powers to act to protect Georgians’ interests in a time of crisis. Although it expires on April 13, the order itself contemplates extension as needed. Title 38 of the Georgia Code provides that in a state of emergency, the Governor may “suspend any regulatory statute [...] if strict compliance [...] would in any way prevent, hinder, or delay necessary action in coping with the emergency or disaster.”<sup>24</sup> Likewise, units of county government are empowered to meet and conduct “all or any part of the public business” in alternate locations and exercise their “powers and functions [...] in the light of the exigencies of the emergency situation without regard to or compliance with time-consuming procedures and formalities prescribed by law.”<sup>25</sup> Georgia law also provides that in emergency situations, when a voter is hospitalized, the registrar or clerk may deliver an absentee ballot to them.<sup>26</sup> As many Georgians are hospitalized with COVID-19, under quarantine order, or under self-quarantine, their medical situations are akin to the emergency hospital status mentioned in this statute. We urge you to use these and any other relevant powers and authorities to make the following improvements to secure the voting rights of all Georgians. If that requires extending the declaration of a state of emergency, so be it.

### Absentee Voting

#### **1. All registered voters should receive absentee ballots by mail, now and for the general election.**

We applaud Secretary Raffensperger’s commitment to mail absentee ballot applications to Georgians on the active voter list. This step alone does not go far enough. All registered voters, including pending and inactive voters, should receive an application for the upcoming primary election, and again in the general election. You should commit to this step now for all remaining elections in 2020 so that no matter how dire the COVID-19 pandemic becomes in Georgia, voters can have confidence that they will have one certain means of voting guaranteed to be available. Georgia law already permits voters of “advanced age or disability” as well as certain overseas and military voters to request absentee ballots for all regularly scheduled elections in an election cycle with one application.<sup>27</sup> Now, in this time of disease-driven stay-at-home orders, quarantines, and airborne respiratory transmission, is the time to afford all Georgians the same simplicity of process.

#### **2. Streamline the absentee ballot application and return process**

In order for the mass mailing of absentee ballot applications to help as many Georgians as possible, Secretary Raffensperger should use all available methods to streamline the application and ballot submission processes. This may include pre-filling application forms with information

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<sup>24</sup> Ga. Code Ann. § 38-3-51(d)(1).

<sup>25</sup> Ga. Code Ann. § 38-3-54.

<sup>26</sup> Ga. Code Ann. § 21-2-384(a)(4).

<sup>27</sup> Ga. Code Ann. § 21-2-381(a)(1)(G).

known from the voter's record file. This solution is being pursued by the North Carolina State Board of Elections Executive Director as well.<sup>28</sup>

It must include simplified identity verification procedures—the notice and cure provision for rejected absentee ballots in the relevant State Election Board Rule could result in many voters engaging in a protracted exchange of written mailings with their board of registrars, punctuated by rule-permissible three day delays, while the clock to finalize their vote is ticking.<sup>29</sup> Given Georgia's ordinarily low proportion of voters choosing to vote absentee, this process has never truly been tested at scale. Allow voters to verify their identity in a manner that is less prone to subjective and inconsistent rejection than signature-matching: the last four digits of their social security number and an affidavit of eligibility, just as is required on the voter registration form.<sup>30</sup>

### **3. Guarantee Free Postage for Absentee Voting.**

Elections officials should ensure that either postage for absentee ballots is prepaid or the postal service agrees to deliver ballots to the boards of registrars without a stamp. Officials should include an instruction with the absentee ballot clearly notifying voters that they will not be required to pay postage to return the ballot. This practice has already been adopted for the June primary election in West Virginia.<sup>31</sup>

### **4. Allow community organizations to collect & deliver marked and sealed ballots**

Georgia law already permits family members and housemates, and for disabled Georgians, a caregiver, to mail or deliver voters' absentee ballots.<sup>32</sup> In times of crisis, an all-hands-on-deck approach is required, especially for voters who may not have postage, may not be able to afford postage, or may be isolated or without family members, housemates, or caregivers to assist them in returning their ballot. Accordingly, you should permit third parties and community groups to return marked, sealed ballots in the same manner that third party involvement in voter registration is allowed in the State of Georgia.

### **5. Establish Drop Boxes for Absentee Ballots**

Allow people to submit their absentee ballots at a variety of drop boxes. Ga. Code § 21-2-382(a) states that “the board of registrars may establish additional sites as additional registrar's offices or places of registration for the purpose of receiving absentee ballots under Code Section 21-2-381.” Under this statute, election officials should ensure that from now until Election Day, voters may drop off ballots at a secure drop box at all polling locations, including the expanded polling locations mentioned above.

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<sup>28</sup> North Carolina State Board of Elections Executive Director Karen Brinson Bell, “Recommendations to Address Election-Related Issues Affected by COVID-19,” (Mar. 26, 2020) (online at [https://s3.amazonaws.com/dl.ncsbe.gov/sboe/SBE%20Legislative%20Recommendations\\_COVID-19.pdf](https://s3.amazonaws.com/dl.ncsbe.gov/sboe/SBE%20Legislative%20Recommendations_COVID-19.pdf)).

<sup>29</sup> [Ga. State Elec. Bd. Rule 183-1-14-.13](#).

<sup>30</sup> See [sos.ga.gov/admin/files/GA\\_VR\\_APP\\_2019.pdf](https://sos.ga.gov/admin/files/GA_VR_APP_2019.pdf).

<sup>31</sup> “Coronavirus Facts,” West Virginia Secretary of State (accessed Apr. 1, 2020) (online at <https://sos.wv.gov/about/Pages/Covid-19.aspx>).

<sup>32</sup> Ga. Code Ann. § 21-2.385(a).

Expand drop box locations to libraries and other easily accessible sites that allow voters to submit a ballot from their vehicle. Ga. Code § 21-2-382(a) provides that boards of registrars may expand drop-off locations for absentee ballots to “any...government building generally accessible to the public...” Using this provision, election officials should create additional sites at government buildings with drop boxes that are car accessible, such as the drop boxes as public libraries or mail slots at municipal facilities when residents submit tax or utility payments. Several states have already expanded their voting options to encompass a wide network of drop box locations that includes easily accessible sites.<sup>33</sup>

Communicate these expanded drop box locations to voters. In order to maximize the effectiveness of these measures, it is vital that this convenient ballot return option is thoroughly publicized to voters.

## **6. Count all ballots postmarked on or before Election Day.**

Ga. Code § 21-2-386(a)(1)(G) allots that for military and overseas voters, absentee ballots shall be counted as long as they are postmarked by Election Day and received within the three-day period following the election. Because COVID-19 will require many isolated voters to vote-by-mail, it is certain that the local postal service will have to process an increased volume of vote-by-mail ballots in this election. To accommodate both the postal service and voters who may have difficulty mailing their ballot back, election officials should treat all voters equally, according to the standard for military and overseas voters, and extend the deadline for receipt of absentee ballots. Officials should count all absentee ballots that are postmarked by Election Day. This accommodation would ease the burden on the postal service, account for any logistical issues that may prevent the service from delivering all ballots by Election Day, and ensure that as many voters as possible can have their voices heard in this election.

### *In-Person Voting & Ballot Return*

For the primary election in May, some voters will choose to self-isolate and utilize the absentee accommodations mentioned above. Other voters, however, will still want to vote in-person, and Georgia should honor their choice by ensuring they have every opportunity to safely cast an in-person ballot. One of the strongest actions Georgia can take to maximize in-person voting is to follow the CDC’s recommendation that states should “[e]ncourage early voting, where voter crowds may be smaller throughout the day. This minimizes the number of individuals a voter may come in contact with.”<sup>34</sup> The CDC also recommends that states “[e]ncourage voters planning to vote in-person [] to arrive at off-peak times.” Finally, you must provide and announce a clear plan to protect poll workers: ensure that adequate hygienic and protective supplies and equipment are available for poll workers, and communicate with poll workers on how to safely operate their polling places during this emergency. To fully support in-person voting, election officials should:

## **7. Declare for All Georgians that Voting Is an Essential Service**

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<sup>33</sup> “Coronavirus: COVID-19,” City of Madison, April 1, 2020, <https://www.cityofmadison.com/health-safety/coronavirus/>; “Absentee Ballot Return Options - COVID-19,” Wisconsin Elections Commission, <https://elections.wi.gov/index.php/>.

<sup>34</sup> “Recommendations for Election Polling Locations,” Centers for Disease Control (Mar. 27, 2020) ([www.cdc.gov/coronavirus/2019-ncov/community/election-polling-locations.html](http://www.cdc.gov/coronavirus/2019-ncov/community/election-polling-locations.html)).

It is not clear in the stay-at-home orders issued by Georgia state and local authorities that voting is a permissible reason to leave one's home. This will lead to confusion for all Georgians and possible self-elimination from the political process for those who wish to honor public health orders but would otherwise vote in person. Worse still, it may lead to voter intimidation and suppression if law enforcement selectively arrest or otherwise enforce the stay-at-home orders, which carry criminal penalties, against civic-minded Georgians seeking to vote at their polling place. You must make clear to all Georgians that voting is an essential service protected in all stay-at-home orders in effect during advance voting and on Election Day.

## **8. Maintain Georgia's Advance Voting Period and Expand Hours and Locations**

Ensure a full early voting period for the May 19, 2020 election. Early voting should begin on Monday, April 27, 2020 and end on May 15, 2020.<sup>35</sup> This period should include the Mandatory Saturday Voting day on May 9, 2020.

Guarantee early voting from 7:00 AM to 7:00 PM each day. Though early voting is usually limited to business hours of 9:00 AM to 4:00 PM, Ga. Code § 21-2-385 provides that "counties and municipalities may extend the hours for voting beyond regular business hours and may provide for additional voting locations pursuant to Code Section 21-2-382 to suit the needs of the electors of the jurisdiction at their option." In light of people's current need to visit polling places at off-peak times where less voters are present, the state should extend early voting hours to include times during the day in which less voters will be present.

Establish additional sites for advance voting. Ga. Code § 21-2-382(a) provides that "the board of registrars may establish additional sites as additional registrar's offices or places of registration...for the purpose of voting absentee ballots under Code Section 21-2-385." Thus, as a corollary to extending early voting hours, officials can further reduce the number of people at each polling location by utilizing this provision to increase the number of locations at which people can vote in person. Expanded access is critical to voters' health, and other jurisdictions have already recognized this by increasing the number of their early voting locations.<sup>36</sup>

Provide voters with advance notice of the days, extended times, and additional locations that are available for early voting.<sup>37</sup>

## **9. Create Vote Centers to Permit Voting at Any Polling Place on Election Day**

Allow voters to cast an in-person ballot at any polling place in the county. As mentioned above, Georgia law currently allows boards of registrars to establish additional polling sites for advance voting in-person.<sup>38</sup> Because of the anticipated limited staffing for voting precincts and the extremely likely polling place closures stemming from poll worker shortages, voters should not be confined to only voting in-person at their assigned precinct location. Every board of registrars

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<sup>35</sup> Ga. Code § 21-2-385.

<sup>36</sup> "DC Board of Elections Announces New Early Voting Measures Amid COVID-19 Response," District of Columbia Board of Elections, Mar. 27, 2020, <https://dcboe.org/CMSPages/GetFile.aspx?guid=db5d3731-c091-497a-bb82-cec259dced46>.

<sup>37</sup> Ga. Code § 21-2-385(d)(2).

<sup>38</sup> Ga. Code § 21-2-382.



should remove precinct restrictions and create vote centers at which a voter may cast a ballot at any polling site. Communicate to voters that they will not be limited to voting only at their precinct polling places. Every county board of registrars should advise voters that they can vote at any polling place in the county and should provide voters with a full and updated list of all available polling places in that county.

Thank you for your attention and cooperation.

Best Regards,

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