

Why the election administration community strongly supports the preservation the Election Assistance Commission.

- The weaknesses in the American electoral system that came to light during and subsequent to 2000 were not the result of aberrations that could be “fixed” and forgotten.
- HR 672 recognizes the importance of ongoing federal support and oversight of elections by providing for the continuation of most functions originally delegated to the EAC.
- By proposing to terminate the EAC and move these functions to the FEC, however, HR 672 fails to provide an adequate foundation for effectively carrying out these functions.
- The EAC was created to fill the vacuum of competence in election administration that existed at the Federal level. In particular, no federal agency, including the FEC, was considered competent to handle the challenges of developing and implementing an effective voting system certification program.
- The peripheral role of the Office of Election Administration, in the FEC, was grossly inadequate to tracking and contributing solutions to the myriad of election management problems revealed during the early years of the past decade.
- The “stepchild” role to which election administration was relegated under the FEC prior to the formation of the EAC was inadequate then and would be inadequate in the future.
- Further, to place these functions back under the FEC shifts the focus in the exact opposite direction from which it should be pointed, i.e., toward the professional, bipartisan/nonpartisan administration of elections.
- “Election administration” and “campaign finance regulation” are very different functions. (They don’t sleep well in the same bed.) Many states substantially separate local election administration from campaign finance regulation in an effort to insulate the conduct of elections from the partisan pressures that inevitably arise in campaign finance regulation
- We believe the separation of the functions of campaign regulation and election administration is critical to preserving the bipartisan objective of fair and open administration of elections.
- We often hear the phrase “elections is not rocket science.” Juan Gilbert, Director of the Human Centered Computing Lab at Clemson University, appended this appropriately with, “it’s more complicated.” Expertise and experience in election administration are essential to an agency overseeing elections. Campaign finance regulation is not election administration.

### Comments on the proposed Guidelines Review Board

- An 82 member Guidelines Review Board, like the current Standards Board, would be an unwieldy and largely ineffective body.
- We see no need for each state to appoint a representative to the GRB. The various associations, agencies and interests to which appointments are designated, as with the current Board of Advisors, represent the broad diversity of states as well as interests and expertise needed on the Guidelines Review Board.
- The GRB is designed to be an advisory board with the primary purpose of providing technical and experiential feedback on proposed voting system guidelines. It is not intended as, nor need it be, a representative assembly. On most matters the issues to be addressed are not particular to the states but rather to voting systems, the use of which cuts across state boundaries.
- Individual states that have a divergent view on any matters considered by the GRB always have the option of commenting on such matters during Commission public comment periods or forums held for such purposes.