

Signature Verification & Compliance Tool Training Manual



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RCW 29A.04.540 RCW 29A.40.110 RCW 29A.60.165 WAC 434-261-051

Training Manual Purpose and Use

This training manual was developed by the Office of the Secretary of State in conjunction with state partners and experts for: "...the use of local election personnel in implementing the standards..." (ESSB 5890, 2024).

Though the Secretary of state may provide this manual and occasional trainings, it is the ultimate responsibility of county auditors to ensure proper training and implementation of the statewide signature verification standards among county personnel.

County auditors must ensure that:

- □ All personnel and canvassing board members receive training every two years. *
- All personnel and canvassing board members take an oath administered by the auditor regarding the discharge of their duties.
- □ All the names of canvassing board members who received training and the date(s) on which the training was completed must be posted on the county auditor webpage.
- **□** Random Compliance Checks (RCC) are completed.

*These requirements do not stop a canvassing board member from seeking office, holding office, or carrying out constitutional duties, yet they are still required in law.

Using This Manual

Auditors, Managers and/or designated trainers: How will you know your staff understand the standards and possess the skills needed to verify signatures? This manual is designed to support your training. With it you will be able to:

- Guide your staff through the state standards.
- Use the provided 'training challenges' and pre/post-training exercises to check for understanding.
- □ Modify / make your own 'training challenges' to check for understanding.
- □ Utilize the compliance tools and guidelines to ensure you and your staff remain on track throughout an election.

In addition, the Secretary of State suggests all staff set aside additional practice time for staff.

Election Personnel: This resource is intended to be used in conjunction with training you receive from your auditor/manager/designated trainer for your county.

Starsオオオ

The Stars located throughout this manual identify opportunities to check for understanding. They can be used to set training goals and track progress.

They are not an exam nor required for the completion of this training

Signature Verification Basics

TRAINING GOALS:

- Understand the Washington State Standards for signature verification.
- Understand the A.C.E examination techniques!
- Merge these understandings to improve your assessments from a pre to a post exercise.

What is signature verification?

It is the "process for verifying that a signature on the ballot declaration is the same as the signature(s) in the voter registration record." - WAC 434-261-051

Where do signatures come from?

- Digital images from driver's licenses or other governmental sources at registration.
- Scanned images from paper voter registrations.
- Scanned images from previously verified ballot declarations.

Who participates in the process?

Canvassing Boards, Trained Administrators and voters/signers.

When does the signature process begin?

In order to perform an effective comparison we need good signatures. Therefore, signature verification efforts really begin with outreach and education to our voters.



RCW 29A.60.165 RCW 29A.60.170 WAC 434-261-052 WAC 434-250-110 WAC 434-261-051 to 053

Processing Overview

Personnel should be familiar with the signature verification process and all stages of signature verification must be open for public observation.

Initial Review: After sorting and preparing ballot envelopes or ballot envelope images for signature review, the following processes must be followed:

- Initial reviews are conducted with the physical ballot envelope, an electronic signature clips or an approved automated signature verification system.
- Reviews are conducted by trained personnel.

Secondary Review: If a signature is not accepted following initial review, that signature must be referred to a second review. Second review must:

- Not be conducted by an automated signature verification system.
- Be conducted by a different authorized reviewer (someone other than the initial review).
- Document user judgements/determinations of signature statuses.
- Send a signature cure form to the voter within three business days of receipt, if challenged.

Additional Reviews: A county auditor may authorize, and personnel may conduct additional reviews of ballot declarations signatures. This may be necessary if/when:

- The auditor becomes aware of a reasonable explanation related to WAC 434-261-051(5).
- The auditor implements tools or practices to ensure quality control and compliance with state verification standards.
- A Random Compliance Check is required.

Fraudulent Signatures

If you believe you have identified a potential fraudulent signature you/the county auditor will need to consider the following:

- "Even if the ballot declaration signature appears to match...a ballot may be referred to the canvassing board if there is clear, objective evidence, beyond the signature itself, that a ballot declaration signature is fraudulent." -WAC 434-261-052.
- "In the event the canvassing board concludes that criminal activity may have occurred, the county auditor must refer the ballot and any relevant material to the county sheriff or county prosecuting attorney." -WAC 434-262-015.

• It is best practice to notify the Office of the Secretary of State of any irregularities.

Training Tips- Managers, have you added all these items to your election procedures? Don't let it pass you by, take a note now, send yourself an email reminder, or mark your calendar with a 'to do'.

Basic Terminology

Challenged/Mismatched - a challenged signature due to multiple, significant, and obvious discrepancies.

Characteristic (Criteria) - distinguishing marks, traits or features within a signature.

Natural Variation - normal deviations that occur in repeated specimens of one writer.

Class Characteristics - characteristics shared between a group of individuals.

Individual Characteristics - characteristics unique to an individual.

Pre- Training Exercise オオオ

A pre-training exercise provides us a baseline for learning. After your training compare this exercise to your post training exercise. This is **not** a certification exam.

County trainers: create/disseminate a pre-training exercise to your learners. You may use your own or those provided by the Secretary of State. Exercises may contain voter signatures and are not included in this manual.

19 or less Correct = 차 20-24 Correct = 차차 25+ Correct = 차차차

15 min

A.C.E. Process of Examination & State Verification Standards

Qualified forensic document examiners utilize the ACE process. ACE stands for:

Analysis Comparison Evaluation

The ACE process is an important tool to help you compare a voter signature on file, but it is **not** a forensic examination.

The process establishes a simple framework for signature comparisons. As you learn about the ACE process, it can help you apply the Washington State Signature Verification Standards from WAC 434-261-051. The ACE process and the statewide standards are clearly differentiated in the steps below.

Analysis

Start with careful consideration of the broad, general characteristics and gradually focus down to the detailed characteristics of the signature. The inter-relationship of the letters is also a key aspect of the analysis. A major danger for a signature checkers is to miss the "forest" because of the "trees"; concentrating on small characteristics and missing broad pictorial features.

Before you begin: Do you have enough signatures to compare?

• A symbol, surname, a common nickname, name variation or initials are needed before proceeding.

Consider Broad and Specific Characteristics:

- Pictorially do the signatures appear to be the same?
- If yes, consider more of the characteristics found below.

STEP 1:

A-nalyze: take note of the general characteristics of the signatures.

Standard: Presume that the signature on the ballot is the voter's signature. (WAC 434-261-051)

Characteristics and Criteria

WAC 434-261-051(3)(a-k) instructs us to consider 11 criteria containing multiple characteristics. The examples below are sorted into general characteristics and detailed characteristics to emphasize the general characteristics recommended for consideration first.

| General Characteristics | Detailed Characteristics |
|---|--|
| a) Alignment (in relation to baseline) | a) Construction of letters, symbols (# of strokes and direction to create) iiiiiiiiiiiiiiiiiiiiiiiiiiiiiiii |
| a) Skill (smooth, well formed, clumsy, fluent?) Aune | d &k) Unusual Traits/Oddities (extra loops, or flourishes) e feblat |
| b) Proportion, height and, width (proportion among other letters/symbols) | c) Slant (overall or internal relationship of slants) |
| c & j) Spacing (distance between lettering & spelling) | f) Endings/Ticks (spurs, endings, loop backs, other individual characteristics) Griday |
| c) Size (overall sizing) Walnus | g) Initial and connecting stroke |
| e) Format (printed, cursive, other form: picture/language) Shankogiving Am Mm | i) Pen Lift (is there a break?) today break |

Comparison

Once each signature is analyzed the characteristics of the signatures are compared for similarities and differences.

Only after the general features are analyzed and comparisons made should we look more closely at individual characteristics and unusual or distinctive characteristics. This comparison should be made across all signatures within a voter's registration record.

The process of analyzing generally and comparing more detailed characteristics may need to be done more than once before moving onto the evaluation step.

Ballot signatures must be compared among all signatures in the voter's registration record when determining discrepancies. - WAC 434-261-052

STEP 2:

C-ompare: Are the general and individual characteristics of the signatures in agreement?

Standard: Did you use the criteria a-k? (WAC 434-261-051 (3)(a-k))

Comparison Example:

Print

Wayne

Can you spot the similarities and differences as they relate to the criteria in WAC 434-261-051(3)(a-k)? The following page provides a comparative analysis.



Using criteria within WAC 434-261-051(3)(a-k) we see agreement among the slant, sizing, cursive characteristics, ending ticks, and construction. Some slight differences present themselves in the mixture of print and cursive, spelling (a dropped 'r') and a pen lift on the 'w'.

| Comparison | | | | |
|------------------|---------------------|--|--|--|
| Similarities | Differences | | | |
| (c)Slant&size | (i) Pen lift on "w" | | | |
| (e)Cursive / Mix | (e) Some printing | | | |
| (f) Ending Ticks | (j) Spelling | | | |
| (a) Construction | | | | |

These two writing samples indicate the amount of variance you might see among the same signature. The next section will review variation and how you will evaluate signatures after comparisons are made.



Evaluation

Evaluation considers all the characteristics of the signatures, assessing the significance or insignificance of the similarities and the differences. The distinctiveness of the writing characteristics is more important than the number of characteristics.

Once all characteristics are considered the evaluation must apply a qualitative assessment. Natural variations, such as the length and shape of two "y" loops may not in and of themselves be significant, however multiple combinations of differences will begin to indicate significant and obvious discrepancies. Keep in mind, the range of variations is different for each writer. Always be aware of signature dates, the age of the writer, and legibility. You can expect a greater range of variation if the signatures are not contemporaneous.

Natural Variation of connections, initial and terminal strokes from the same writer

Natural variation of slant and Slope from same writer



The Washington State standard asks us to consider two important questions before concluding our evaluation:

- Is the signature free of "multiple, significant and obvious discrepancies" among those on file? (WAC 434-261-052)
- Can discrepancies be reasonably explained by other factors? (WAC 434-261-051(5))

Before making a recommendation be careful. Discrepancies may have other *reasonable* explanations as described in WAC 434-261-051.

Study the applications of this standard on the following pages. County personnel and ultimately the canvassing board must determine if there is a reasonable explanation that may apply.

<u>STEP 3:</u>

E-valuate: assess the significance or insignificance of the similarities and the differences.

Standard: Is the signature free of "multiple, significant and obvious discrepancies" among those on file?

(WAC 434-261-052)

Standard: If applicable, can those discrepancies be *reasonably* explained by other factors?

(WAC 434-261-051 (5)(a-h))

Other Factors

Significant or obvious differences **may** be explained by other factors. You and ultimately your canvassing board must determine if certain discrepancies "can reasonably be explained by the following" factors below (WAC 434-261-051(5)(a-h). Remember: Just because a factor exists does not mean it holds a reasonable explanation.

The examples below come from verified authors possessing the factors discussed. Red- are dissimilarities and Green- are agreements.

(a) A shaky signature that could be health-related or the result of aging.

Example 1:

Voter Registration Many wet Bounde White Margane Bourke - White

Ballot Envelope

Accepted- the lack of distinct lettering and skill (red-right) can be reasonably attributed to a shaky hand because of the historic variance of the signatures on file where the agreement among slant, style, proportionality, and construction in "W", "g", "t"and "r" remain.ⁱ

Example 2:

Voter Registration

Ballot Envelope

Baila G

Accepted- the lack of distinct lettering, and missing letters can reasonably be explained by the historic variance of the writer and other agreements among construction and style seen in the green stoke notes above.ⁱⁱ

Example 3.- Different Authors

Voter Registration



Ballot Envelope

.ta

Mismatched- construction of the "e, r" and "R", sizing/proportions, style and alignment differences cannot be reasonably explained. Significant similarities, indicating the same or similar handwriting are not present.^{III}

(b) The use of a variation of the voter's full name, nickname or initials.

Example 1.



Accepted- the significant agreement of the last name, overall style and construction of lettering reasonably explains variation in the name above.

Example 2.



Accepted- the agreement in construction of the lettering, stroke and similar styling, offer a reasonable explanation for the use of initials and this factor.

Example 3.- *Different Authors*



Mismatched- The use of the last name only, and lack of significant similarities does not reasonably explain or excuse the discrepancies found elsewhere (slant, size/proportion, letter construction, distinctive "L").

(c) Change in the voter's signature over time.

Example 1.

Ballot Envelope Voter Registration

Accepted- The sylized progression seen in these signatures can reasonably explain the change in the voter signature over time (a quicker constructions: "A" and "arble")

Example 2.

Voter Registration Rogger izablit Rogger Rabbit Rogger Rabbit Rogger Rabbit

Accepted- the development of this writer, while maintaining letter formation, style and construction(s) indicates a reasonable explanation for a change occurring in the envelope signature.

Example 3. - Different Authors



Mismatched- the progression of the signature does not reasonably explain the discrepancies found. The "o", "n", and the absence of the "y" are significantly dissimilar and obviously different without significant similarities elsewhere.

(d) A signature written in haste.

Example 1.

Ballot Envelope Voter Registration w ellip lich

Accepted- it is reasonable explained that the voter was moving with haste because the voter retains agreement in their general style, letter formation (i, l, h) and. Haste can explain the discrepancies in placement/slant, leading "I" hooks and poor/missing letters.

Example 2.



Accepted- it is reasonably explained that the voter was moving with haste, because the voter retains the style, size, proportions, and construction of the letter's present (S,y,Q). Haste in this case reasonably explains the discrepancies in dropped letters, connecting letters, stylized "y" and flourished endings.

Example 3. - Different Authors



Mismatched- haste does not reasonably explain the discrepancies here: differences in 'T' crossing, 'R' formation, and all other lettering bear no resemblance). A lack of similarities prevent any reasonable explanation for the numerous discrepancies or absences.

(e) Use of stylus pen or other electronic signature tool resulting in thick or fuzzy quality

Example 1.



Accepted- difficult and unclear comparisons of the "unian" (red) may be reasonably explained because of a stylus or electronic device due to the rest of the signatures retaining general style, slant, construction (Mr,E), ending ticks, proportions and size.

Example 2.

Voter Registration Ballot Envelope

Accepted- a pen or stylus was used (left) and can explain some slight differences in: formations (o,p,a). It is reasonably explained that stylus or finger may not provide precision to finish/enclose letter formation and in this signature the overall style, construction in other lettering "rks" and "sa" are in agreement, as well as proportion.

Example 3. - Different Authors

Ballot Envelope **Voter Registration**

Mismatched- the type of e-pen/stylus used (left) does not explain the multiple and obvious discrepancies: connecting strokes (e/m,p/a,k/h), the formations not attributable to a halting nature of a stylus (P,m,t,) and spacing/connections between letters (red dashes).

(f) A writing surface that is hard, soft, uneven or unstable.

Example 1.



Accepted- because general agreement in style, letter proportions, some distinct letter construction ('F','o' and especially 's') it is reasonable to presume an uneven writing surface caused discrepancies in the 'u', 'g', and 'a' for the writer.

Example 2.



Accepted- because of general agreement in style, proportion and most all letter construction, it is reasonable that the writer's surface simply interfered their signature to form some of the minor discrepancies found in the 'd' and 'y'.

Example 3. - Different Authors

Voter Registration **Ballot Envelope**

Mismatched- it is not reasonable to presume the writer's surface had anything do to with the discrepancies seen here: slants, letter constructions (S,u,s,a,n,t,y) and internal spacing of letters. A lack of other similarities prevent any reasonable explanation for the numerous, significant and obvious discrepancies.

(g) A voting history of fewer than three ballots returned.

Example 1.

Ballot Envelope Voter Registration

Accepted- a limited voting history can reasonably explain the differences in these two signatures, because they are accompanied by multiple clear similarities in the "C" "l" "a" "r" and "B". A voter now stylizing their signature, with few other examples to indicate the progression would explain the differences when these other agreements are present.

Example 2.



Accepted- a lack of voting history can reasonably explain smaller discrepancies in this signature ('M 'and 'A' formation stylized, 'e' dropped) because the overall style, formations, slants, and constructions in 'l', 'i', 'c' remain in complete agreement. The general agreement in slants and unique slants between the 'A' and 'l'. This signer has likely started stylizing their signature.

Example 3. - Different Authors



Mismatched- just because there is limited voting history does not mean it is always reasonable to accept the signature. This signature comparison does not have a reasonable explanation because of the significant and obvious differences (The formation of most letters, connecting strokes 'o/n', size and proportions). They are not accompanied by similarities that would even hint toward the same registration signature.

(h) Or other reasonable factors.

WAC 434-261-051 leaves open the possibility of other factors **with** reasonable explanations. These may include volunteered communication by the voter indicating an injury or if a voter has a unique picture, symbolic, or non-latin script.

You and ultimately the canvassing board must use the criteria found in WAC to form reasonable explanations when implementing section 'h'. Some examples may include the following:

Example 1.



Accepted- symbols and characters are other reasonable factors that can reasonably explain absence of WAC 434-261-051 lettering criteria. Coupled with other WAC criteria agreements such as general fluency, construction, proportions in symbols and size, this signature does not present multiple, significant, nor obvious discrepancies.

Example 2.



Accepted- non-Latin based scripts are another factor that can reasonably explain absence of specified lettering criteria found in WAC 434-261-051. More universal elements such as general fluency, construction, size, proportion, and slant do not present multiple, significant, and obvious discrepancies.

Example 3. – Different Authors



Mismatch- non-Latin based script cannot reasonably explain the difference here. The style, spacing between/among characters, endings tics, pen lifts, and loops present multiple, obvious and significant differences. It is not reasonable to suggest that the script type itself can provide a reasonable explanation for the discrepancies.

Review: A.C.E. Process & Signature Standards

ACE is a process used by forensic document examiners to slow down and ensure a deliberate approach to signature comparison. We are not conducting forensic document examinations but, will utilize some of those techniques when applying the statewide standards in our 3-step approach:

STEP 1:

A-nalyze: take note of the general characteristics of the signatures.

Standard: Presume that the signature on the ballot is the voter's signature.

STEP 2:

C-ompare: Are the general and individual characteristics of the signatures in agreement?

Standard: Did you use the criteria a-k? (WAC 434-261-051 (3)(a-k))

<u>STEP 3:</u>

E-valuate: assess the significance or insignificance of the similarities and the differences.

Standard: Is the signature free of "multiple, significant and obvious discrepancies" among those on

file?(WAC 434-261-052)

Standard: If applicable, can those discrepancies be *reasonably* explained by other factors?

(WAC 434-261-051 (5)(a-h))

Post- Training Exercise オオオ

This is **not** a certification exam. A post- training exercise provides a comparison to your pre-test for further self-examination and improvement.

County trainers: create/disseminate a post-training exercise to your learners. You may use your own or those provided by the Secretary of State. Exercises may contain voter signatures and are not included in this manual.

19 or less Correct = ☆ 20-24 Correct = ☆☆ 25+ Correct = ☆☆☆

15 min

Compliance Checks Tools & Policy

To check compliance with signature verification standards statewide, the Secretary of State is implementing tools for use by county auditors and managers according to RCW 29A.60.165. The tools consist of this notice, a compliance log template, and a county checklist.

County Auditors and election personnel must implement Random Compliance Checks (RCC).

Random Compliance Checks (RCC) consist of:

- A process open to public observation.
- A date and time chosen by the Secretary of State to begin the check.
- A random statewide sampling of all mismatched signatures after secondary review and prior to the final meeting of county canvassing boards.
- The random sampling conducted by the Secretary of State includes:
 - Slovin's formula or a similar sampling formula will be used to determine the statewide sample size using a 95% confidence interval.
 - Random selection will be determined by the Secretary's internal policy.
- A list of ballot/envelope IDs will be provided to auditors for the compliance check.
- A review conducted by trained personnel who have not previously reviewed the signature.
- An RCC log containing ballot ID, voter name, user ID/ staff name (of last reviewer), signature status, a corrected status if applicable, staff initials (of compliance checker), total signatures checked, and percentage of signatures requiring correction.
- Appropriate feedback and/or training provided to signature verification personnel.
- A report sent to the Secretary of State Elections Division including an RCC log (copy).

Random Compliance Checks (RCC) Checklist

This checklist is a tool intended for use by both the county auditor and Secretary of State to ensure proper implementation of the compliance check.

Prior to an Election

Auditors

- **D** Establish procedures indicating who will conduct the signature check.
- **□** Establish procedures indicating how mismatched signatures will be pulled and stored.
- **□** Establish procedures indicating how/when feedback is to be given to election personnel.

Secretary of State

- **□** Establishes the exact time(s) of the random sampling across the state.
- Establish procedures that identify the sample size, random selection protocol and distribution method of ballot IDs to be distributed to Auditors.

During Election Processing

Auditors

- **□** Ensure the RCC will be open to public observation.
- **D** Ensure a complete secondary review prior to sampling.
- **Complete RCC logs with corrections summary.**
- **D** Provide signature checkers with appropriate feedback/training as necessary.

After Compliance Check

- **D** Document and retain RCC logs.
- **D** Provide RCC logs to the Secretary of State.

Compliance Check Log

Election:_____

Total Challenged Signatures to Check: _____

Number and Ballot IDs provided by Secretary of State's random sampling process.

| | Random Compliance Check | | | | | | | |
|--|-------------------------|-----------------------|------------|---|---|---|--------------------------|--|
| Ballot ID# Provided by Sec. of State Random Sampling | Voter First Name | Voter Last Name | Batch # | User ID / Staff Name (of last reviewer) | Signature Status All should be "signature does not match" | Corrected Status If Applicable A change in status indicates a standard is not met | RCC Staff Initials | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

*Add rows on additional pages as necessary

Total Signatures Checked:_____ Total Corrections: _____

- **G** Signature checkers provided appropriate feedback/training. (leave blank if no corrections)
- A summary of observations/ themes (if any) attached to this log and shared with the Secretary of State. (leave blank if no corrections)

Staff Name: _____

Staff Signature: _____

**Contact the State Elections Division for a Microsoft Excel Version of this document. **

Training Resources

This section is intended for county auditors and trainers.

POST AND PRE TRAINING EXERCISE

The Secretary of State has both pre- and post- training exercises in PDF formats with answer keys for trainers. These may include actual voter signatures (protected private information). Please contact ctsupport@sos.wa.gov for the latest exercises.

You are also encourage to design your own based upon learner needs, especially if you wish to use the Voter Registration database as part of a hands on training exercise. Should you need assistance, ideas and support please contact creativecommons.org

| TRAINING CHALLENGE #1- SEEING VARIATIONS | |
|--|---|
| Instructions Sign your name 5 times. Mentally note the differences / similarities. Exchange your paper with another. Circle similarities. Underline the differences. Discuss your observations with your partner. | |
| Your Name (printed): Your Signatures: | |
| 1 2 | |
| 3 4 | |
| 5 | - |
| | |

References

Revised Code of Washington (RCW):

RCW 29A.40.091

Envelopes, declaration, and instructions— Voter's oath—Overseas and service voters— Return of ballots—County auditor's name.

(1) The county auditor shall send each voter a ballot, a security envelope in which to conceal the ballot after voting, a larger envelope in which to return the security envelope, a declaration that the voter must sign, and instructions on how to obtain information about the election, how to mark the ballot, and how to return the ballot to the county auditor. The calendar date of the election must be prominently displayed in bold type, twenty-point font or larger, on the envelope sent to the voter containing the ballot and other materials listed in this subsection.

(2) (a) The voter must swear under penalty of perjury that he or she meets the qualifications to vote, and has not voted in any other jurisdiction at this election. The declaration must clearly inform the voter that it is illegal to vote if he or she is not a United States citizen; it is illegal to vote if he or she is serving a sentence of total confinement under the jurisdiction of the department of corrections for a felony conviction or is currently incarcerated for a federal or out-of-state felony conviction; and it is illegal to cast a ballot or sign a ballot declaration on behalf of another voter; and that the signature on the declaration will be compared to the signature in the voter's registration file. The ballot materials must provide space for the voter to sign the declaration, indicate the date on which the ballot was voted, and include a telephone number.

(b) By June 1, 2025, the declaration in (a) of this subsection must also clearly inform the voter that the signature on the declaration will be compared to the signature in the voter's registration file.

(3) For overseas and service voters, the signed declaration constitutes the equivalent of a voter registration. Return envelopes for overseas and service voters must enable the ballot to be returned postage free if mailed through the United States postal service, United States armed forces postal service, or the postal service of a United States foreign embassy under 39 U.S.C. 3406.

(4) The voter must be instructed to either return the ballot to the county auditor no later than 8:00 p.m. the day of the election or primary, or mail the ballot to the county auditor with a postmark no later than the day of the election or primary. Return envelopes for all election ballots must include prepaid postage. Service and overseas voters must be provided with instructions and a privacy sheet for returning the ballot and signed declaration by fax or email. A voted ballot and signed declaration returned by fax or email must be received by 8:00 p.m. on the day of the election or primary.

(5) The county auditor's name may not appear on the security envelope, the return envelope, or on any voting instructions or materials included with the ballot if he or she is a candidate for office during the same year.

(6) For purposes of this section, "prepaid postage" means any method of return postage paid by the county or state.

RCW 29A.40.100 Observers.

County auditors must request that observers be appointed by the major political parties to be present during the processing of ballots at the counting center. County auditors have discretion to also request that observers be appointed by any campaigns or organizations. The absence of the observers will not prevent the processing of ballots if the county auditor has requested their presence.

Observers may not touch any ballots, ballot materials, or election systems. Unauthorized physical contact, or access to ballots or election systems is a crime subject to punishment under chapter 29A.84 RCW.

RCW 29A.40.110

Processing incoming ballots.

(1) The opening and subsequent processing of return envelopes for any primary or election may begin upon receipt. The tabulation of absentee ballots must not commence until after 8:00 p.m. on the day of the primary or election.

(2) All received return envelopes must be placed in secure locations from the time of delivery to the county auditor until their subsequent opening. After opening the return envelopes, the county canvassing board shall place all of the ballots in secure storage until processing. Ballots may be taken from the inner envelopes and all the normal procedural steps may be performed to prepare these ballots for tabulation.

(3) The canvassing board, or its designated representatives, shall examine the postmark on the return envelope and signature on the declaration

before processing the ballot. The ballot must either be received no later than 8:00 p.m. on the day of the primary or election, or must be postmarked no later than the day of the primary or election. All personnel assigned to verify signatures must receive training on statewide standards for signature verification. The county auditor shall publish on its website the names of all canvassing board members who received training on statewide standards for signature verification and the dates on which the training was completed. Personnel shall verify that the voter's signature on the ballot declaration is the same as the signature of that voter in the registration files of the county. Verification may be conducted by an automated verification system approved by the secretary of state. A variation between the signature of the voter on the ballot declaration and the signature of that voter in the registration files due to the substitution of initials or the use of common nicknames is permitted so long as the surname and handwriting are clearly the same. A county that is participating in the alternative verification options pilot project under section 1 of this act may also verify a voter's ballot using an alternative verification method approved by the office of the secretary of state.

(4) If the postmark is missing or illegible, the date on the ballot declaration to which the voter has attested determines the validity, as to the time of voting, for that ballot. For overseas voters and service voters, the date on the declaration to which the voter has attested determines the validity, as to the time of voting, for that ballot. Any overseas voter or service voter may return the signed declaration and voted ballot by fax or email by 8:00 p.m. on the day of the primary or election, and the county auditor must use established procedures to maintain the secrecy of the ballot.

RCW 29A.60.170

List of observers—Counting center, direction and observation of proceedings—Random check of counting equipment—Report.

...(2) The counting center is under the direction of the county auditor and must be open to observation by one representative from each major political party, if representatives have been appointed by the respective major political parties and these representatives are present while the counting center is operating. The proceedings must be open to the public, but no persons except those employed and authorized by the county auditor may touch any ballot or ballot container or operate a vote tallying system.

RCW 29A.60.165 Unsigned ballot declarations.

(1) If the voter neglects to sign the ballot declaration, the auditor shall notify the voter by firstclass mail and, if the auditor has a telephone number or email address on file for a voter, by telephone, text message, or email, and advise the voter both that their ballot is unsigned and advise the voter of the correct procedures for completing the unsigned declaration. If the ballot is received within three business days of the final meeting of the canvassing board, or the voter has been notified by first-class mail and has not responded at least three business days before the final meeting of the canvassing board, then the auditor shall attempt to notify the voter by telephone, using the voter registration record information.

(2)(a) If the handwriting of the signature on a ballot declaration is not the same as the handwriting of the signature on the registration file, the auditor shall notify the voter by first-class mail, and, if the auditor has a telephone number or email address on file for a voter, by telephone, text message, or email, enclosing a copy of the declaration if notified by firstclass mail or email, and advise the voter of the correct procedures for updating his or her signature on the voter registration file. If the ballot is received within three business days of the final meeting of the canvassing board, or the voter has been notified by first-class mail and has not responded at least three business days before the final meeting of the canvassing board, then the auditor shall attempt to notify the voter by telephone, text message, or email, using the voter registration record information.

(b) If the signature on a ballot declaration is not the same as the signature on the registration file because the voter's name has changed, the ballot may be counted as long as the handwriting is clearly the same. The auditor shall send the voter a changeof-name form under RCW 29A.08.440 and direct the voter to complete the form.

(c) If the signature on a ballot declaration is not the same as the signature on the registration file because the voter used initials or a common nickname, the ballot may be counted as long as the surname and handwriting are clearly the same.

(3) If the auditor calls a voter who neglected to sign the ballot declaration or whose signature on the ballot declaration does not match the signature in the registration file and the voter does not answer, but voice mail is available, the auditor shall leave a voice mail message. (4) An auditor who provides electronic means for submission of a ballot declaration signature shall establish appropriate privacy and security protocols that ensure that the information transmitted is received directly and securely by the auditor and is only used for the stated purposes of verifying the signature on the voter's ballot.

(5) If a voter's ballot is rejected in two consecutive primary or general elections due to a mismatched signature, the auditor must contact the voter by telephone, text message, or email, if the auditor has a telephone number or email address on file for the voter, and request that the voter update their signature for the voter's registration file.

(6) A voter may not cure a missing or mismatched signature for purposes of counting the ballot in a recount.

(7) A record must be kept of all ballots with missing and mismatched signatures. The record must contain the date on which the voter was contacted or the notice was mailed, as well as the date on which the voter submitted updated information. The record must be updated each day that ballots are processed under RCW 29A.60.160, each time a voter was contacted or the notice was mailed, and when the voter submitted updated information. The auditor shall send the record, and any updated records, to the secretary of state no later than forty-eight hours after the record is created or updated. The secretary of state shall make all records publicly available no later than twenty-four hours after receiving the record.

RCW 29A.04.540

Training of administrators.

A person having responsibility for the administration or conduct of elections shall, within eighteen months of undertaking those responsibilities, receive general training regarding the conduct of elections and specific training regarding their responsibilities and duties as prescribed by this title or by rules adopted by the secretary of state under this title. Included among those persons for whom such training is mandatory are the following:

(1) Secretary of state elections division personnel;

(2) County elections administrators under RCW 36.22.220; and

(3) Any other person or group charged with election administration responsibilities if the person or group is designated by rule adopted by the secretary of state as requiring the training. Neither this section nor

RCW 29A.04.530 may be construed as requiring an elected official to receive training or a certificate of training as a condition for seeking or holding elective office or as a condition for carrying out constitutional duties.

Washington Administrative Code (WAC):

WAC 434-261-020

Observers.

Counting center operations shall be observed by at least one representative from each political party, if representatives have been appointed by the respective political parties and those representatives are present while the counting center is in operation.

Prior to processing ballots for a primary or election, the county auditor shall notify the major political parties in writing of the maximum number of official observers allowed to observe ballot processing and the date ballot processing begins. Where more than one observer is appointed, the political party shall designate one of the observers as supervisor. The county auditor may require observers to receive training with respect to ballot processing procedures and the vote tallying system.

Before final assignment as observers, major political party representatives so appointed shall be reviewed by the county auditor, who may refuse to approve any person so appointed. In the event the auditor rejects a person designated, he or she shall promptly notify the political party concerned and request that a substitute observer be appointed, and shall ensure that the substitute observer is trained.

Representatives of the major political parties appointed as observers shall be identified by roster, including assigned observer stations if more than one in the counting center, and by identification tags which will indicate the observer's name and the party represented.

The counting center is under the direction of the county auditor. All observers are authorized to observe the processing of ballots for the current election as defined by WAC 434-250-110. Observers may not touch or record images of voted ballots, challenge signature check decisions, object to decisions to count or not count votes or ballots, or disrupt ballot processing. The county auditor shall provide written rules for observers. The county auditor may require an observer who does not follow the established rules to leave the counting center.

WAC 434-261-051

Standards for verifying ballot declaration signatures.

(1) This regulation, together with WAC 434-261-052 and 434-261-053, describes the process for verifying that a signature on the ballot declaration is the same as the signature(s) in the voter registration ((signature)) record.

(2) At each stage of the signature verification process, there is a presumption that the signature on the ballot declaration is the voter's signature.

(3) When reviewing ballot declaration signatures, staff assigned to verify signatures shall consider the following criteria:

(a) Agreement in style and general appearance, including basic construction, skill, alignment, fluency, and a general uniformity and consistency between signatures;

(b) Agreement in the proportions of individual letters, characters, or symbols, height to width, and heights of the upper to lower case letters, characters, or symbols;

(c) Irregular spacing, slants, or sizes of letters, characters, or symbols that are duplicated in both signatures;

(d) Agreement of the most distinctive, unusual traits of the signatures;

(e) The ballot declaration signature is in the same format as the signature(s) in the voter registration record, such as in printed or cursive, various languages, pictorial, symbol, or another form;

(f) Agreement of individual characteristics, such as how "t's" are crossed, "i's" are dotted, or loops are made on letters, characters, or symbols;

(g) Agreement of initial strokes and connecting strokes of the signature;

(h) Agreement of similar endings, such as an abrupt end, a long tail, or loop back around;

(i) Agreement of presence or absence of pen lifts;

(j) Agreement in the way names are spelled; and

(k) After considering the general traits, agreement of the most distinctive, unusual traits of the signatures.

(4) If it appears the voter has changed their name, and the in-formation required under RCW 29A.08.440 to complete a name change is not provided or legible, the county auditor shall send the voter a change of name form or voter registration form under RCW 29A.08.440 and direct the voter to complete the form. (5) When reviewing ballot declaration signatures that appear to contain a discrepancy, staff verifying signatures should accept signatures if the appearance of a discrepancy can reasonably be explained by the following:

(a) A shaky signature that could be healthrelated or the result of aging;

(b) The voter's use of a variation of the voter's full name, such as the use of initials, including or omitting a middle name, or substituting a middle name for a first name;

(c) A change in the voter's signature over time;

(d) A signature written in haste;

(e) A signature in the voter's registration record that was written with a stylus pen or other electronic signature tool, which may result in a thick or fuzzy quality;

(f) A writing surface that was hard, soft, uneven, or unstable;

(g) The voter has a limited history of fewer than three ballots returned; and

(h) Any other reasonable factor.

(6) An agent, including someone acting under a power of attorney, cannot sign a ballot declaration on behalf of their principal.

(7) If a voter signs another voter's ballot declaration, but elections personnel can identify the correct voter, verify that the provided signature matches the signature(s) in the voter registration record and verify that the voter who signed the ballot declaration has not re-turned another ballot, the signature and the ballot must be accepted for the voter who signed the ballot declaration. The county auditor may only count the races and measures for which the voter who signed the declaration is eligible to vote. If the voter who signed the ballot declaration has previously submitted a ballot, the county auditor shall refer the ballot(s) received after the initially received ballot to the canvassing board. If the ballot was identified by staff on or before election day, the county auditor must attempt to contact the voter to whom the ballot was issued by phone, email, text message, or, if time allows, by mail, and provide the voter a replacement ballot.

(8) All staff verifying ballot declaration signatures must receive training on these signature verification standards before verifying ballot declaration signatures. They must attend the training at least once every two years. This applies to, but is not necessarily limited to, individuals performing the initial review, secondary re-view, and review of signatures as part of the cure process. Members of the county canvassing board are required to receive training except as exempted by RCW 29A.04.540. The county auditor shall publish on its website the names of all canvassing board members who received training on the statewide standards for signature verification and the date(s) on which the training was completed. The website shall be updated at least 18 days before the next election with the canvassing board members' training date(s).

(9) The canvassing board may designate the county auditor or the county auditor's staff to perform the signature verification function. All personnel assigned to the duty of signature verification shall subscribe to an oath administered by the county auditor regarding the discharge of their duties.

(10) The signature verification process shall be open to the public, subject to reasonable procedures adopted and promulgated by the canvassing board to ensure that order is maintained and to safeguard the integrity of the process.

WAC 434-261-052

Initial and secondary review of ballot declaration signatures.

(1) When conducting an initial review of a ballot declaration signature, the county auditor must accept the signature under the following conditions:

(a) The county auditor must accept the signature unless, considering the criteria in WAC 434-261-051, the signature on the ballot envelope has multiple, significant, and obvious discrepancies from the signature(s) in the voter registration record; or

(b) If the voter is unable to sign their name as they are registered to vote, the signature must be accepted so long as the voter has made a mark or signature stamp, and the ballot declaration includes two witness signatures.

(2) If the signature is not accepted following the initial review, the ballot declaration signature must be referred to a second review.

(a) A different person who has received signature verification training under WAC 434-261-051(8) must conduct the second re-view of the signature.

(b) If, considering the criteria in WAC 434-261-051 (((3) and (4))), the second reviewer determines that there are multiple, significant, obvious discrepancies from ((all signatures)) the signature(s) in the ((voter's)) voter registration record, the voter must be notified of the process to cure the signature;

(3) The county auditor may conduct additional reviews of ballot declaration signatures that have not yet been accepted. For example, if the county auditor becomes aware of reasonable explanations that should be considered under WAC 434-261-051(5), an additional review may be appropriate.

(4) Even if the ballot declaration signature appears to match the signature(s) in the voter registration record, and not withstanding any other provision, a ballot may be referred to the canvassing board if there is clear, objective evidence, beyond the signature itself, that a ballot declaration signature is fraudulent. This provision is intended to apply only very rarely, such as in instances of confessed forgery or similar circumstances. A person verifying signatures may refer a ballot declaration signature to the county auditor, and, if satisfied that the standard is met, the county auditor may refer the ballot to the canvassing board. The county auditor and the canvassing board may refer the matter to law enforcement.

(5) The county auditor may conduct the initial signature review by using an automated verification system approved by the secretary of state. If a signature is not accepted by the automated verification system, the county auditor must manually use the process described in this section.

(6) If two ballots are returned in one return envelope, ballots may be accepted in the following manner. In all other circumstances, the ballots must be referred to the canvassing board for rejection.

(a) If there is only one valid signature on the ballot declaration and the races and measures voted are the same on both ballots, the races and measures voted the same on both ballots may be counted once;

(b) If there are two valid signatures on the ballot declaration, both ballots may be counted in their entirety; or

(c) If there is one valid signature on the ballot declaration and the envelope contains one voted ballot and one blank ballot without marked votes, the voted ballot may be counted in its entirety.

WAC 434-261-053

Ballot declaration signature cure process.

(1) If a ballot declaration signature is not accepted following secondary review, the voter used a mark or signature stamp but did not include witnesses, or if the ballot declaration was not signed, the ballot cannot be counted until the voter cures their signature. The voter identified on the ballot return envelope must be notified as soon as practicable, but no later than three business days following receipt, that the signature on the ballot declaration does not match the signature(s) in the voter registration record. The county must notify the voter of the procedure for curing their signature by:

(a) A notice letter package sent by first class mail with a signature update form or a missing signature form. The form must include the ballot declaration required by WAC 434-230-015. The notice letter package must also include a prepaid envelope in which to return a completed signature update or missing signature form. The notice letter must:

(i) Be in substantially the same form as the sample notice letter created by the secretary of state; and

(ii) Be available in all languages required by the Department of Justice.

(b) Telephone, leaving a voicemail if the voter does not answer and voicemail is available (if the voter has provided a phone number);

(c) Text message (if the voter has opted into text message notifications); and

(d) Email, enclosing a copy of the signature cure form (if the voter has provided an email address).

(2) The voter may cure their ballot signature no later than the close of business the day before the election is certified.

If the voter has not responded to the signature cure notice by five business days before the final meeting of the canvassing board, the county auditor must attempt to notify the voter by:

(a) Telephone, leaving a voicemail if the voter does not answer and voicemail is available (if the voter has provided a phone number);

(b) Text message (if the voter has opted into text message notifications); and

(c) Email, enclosing a copy of the signature cure form (if the voter has provided an email address).

(3) A voter may cure a missing signature by:
 (a) Returning a signed missing signature
 form. The signature on the form must be compared to
 the ((voter's signature)) signature(s) in the voter

registration record using the process described in WAC 434-261-052; or

(b) Appearing in person and signing the ballot declaration. The signature on the ballot declaration must be compared to the ((voter's signature)) signature(s) in the voter registration record using the process described in WAC 434-261-052.

(4) A voter using a mark or signature stamp may cure a failure to have two witnesses attest to the ballot declaration signature by re-turning a missing signature form. The form must contain the voter's mark or signature stamp and the signatures of two witnesses.

(5) A voter may cure a nonmatching signature by either:

(a) Returning a signature update form or appearing in person and signing a new registration form.

(i) The signature on the form must be compared to the signature on the ballot declaration using the process described in WAC 434-261-052;

(ii) The signature on the form is saved as a new signature in the voter registration record for the current and future elections; or

(b) Providing valid secondary identity verification. The county auditor must verify the secondary identification is for the voter who signed the ballot declaration. Secondary identification may be:

(i) The last four digits of the voter's Social Security number or the voter's full driver's license, instruction permit, or state identicard number;

(ii) Photo identification, valid enrollment card of a federally recognized Indian tribe in Washington state, copy of a current utility bill or current bank statement, copy of a current government check, copy of a current paycheck, or a government document, other than a voter registration card, that shows both the name and address of the voter; or

(iii) A multifactor authentication code, from a system approved by the secretary of state, the county auditor sent to the voter's phone number or email address that has previously been provided by the voter.

If a voter successfully provides secondary identity verification and confirms, orally or in writing, that the voter in fact returned the ballot, the ballot must be accepted unless two persons who have received signature verification training under WAC 434-261-051(8) conclude beyond a reasonable doubt that a person other than the voter signed the ballot declaration. This conclusion may be based on evidence including, but not limited to, other ballots in the same election bearing the same signature.

(6) If the registered voter asserts that the signature on the ballot declaration is not the voter's signature prior to 8:00 p.m. on election day, the voter may be provided the op-opportunity to vote a replacement ballot.

(7) If the voter does not successfully cure their signature by close of business the day before certification of the election, the ballot must be sent to the canvassing board.

(8) A record must be kept of the process used to cure ballot envelopes with missing and mismatched signatures. The record must contain the date on which each voter was contacted, the notice was mailed, and the date on which each voter subsequently submitted a signature to cure the missing or mismatched signature.

WAC 434-261-045 Secure storage.

Secure storage is a container or room that stores voted ballots and electronic data containing voted ballot images. Secure storage must employ the use of numbered seals and logs, or other security measures, that document each individual's access to the voted ballots or voted ballot images, and detect inappropriate access to the secure storage. Voted ballots and voted electronic ballot images must remain in secure storage except during processing, duplication, resolution, inspection by the canvassing board, or tabulation. Unsecured ballots must be accompanied by at least two county auditor staff at all times.

A secure location is a room or other facility where programming and equipment used for ballot tabulation are stored. A secure location must use the same security measures as for voted ballots and voted ballot images.

Use of numbered seals requires:

(1) A seal log that documents the numbers of the seals and the individuals applying or removing seals; and

(2) At least two individuals present when seals are applied or removed. Both must sign the seal log.

Closing of unstaffed ballot boxes must follow WAC 434-250-100. Voted ballots and voted

ballot images may only be accessed in accordance with RCW 29A.60.110 and 29A.60.125.

WAC 434-250-110 Processing ballots.

(1) Ballot processing definitions:

(a) "Initial processing" means all steps taken to prepare ballots for tabulation.

(b) "Final processing" means the reading of ballots by an optical scan voting system for the purpose of producing returns of votes cast, but does not include tabulation.

(c) "Tabulation" means the production of returns of votes cast for candidates or ballot measures in a form that can be read by a person, whether as precinct totals, partial cumulative totals, or final cumulative totals.

(d) "Conditional" means a ballot issued when the voter registration system is unable to process an application submitted in person. The voter is conditionally registered and the voter's current ballot shall be accepted only after the application has been processed.

(2) Prior to initial processing of ballots, the county auditor shall notify the county chair of each major political party of the time and date on which processing shall begin, and shall request that each major political party appoint official observers to observe the processing and tabulation of ballots. If any major political party has appointed observers, such observers may be present for initial processing, final processing, or tabulation, if they so choose, but failure to appoint or attend shall not preclude the processing or tabulation of ballots.

(3) Initial processing includes, but is not limited to:

(a) Identification and receipt of current and suspended ballots:

(i) Current ballots are received and prepared for signature verification;

(ii) Suspended ballots are received and held until the seventh day following election day to allow time for a voter's current ballot to be received.

(b) Sorting of suspended ballots due to voter registration transfers:

(i) In-county suspended ballots are secured and held;

(ii) Out-of-county suspended ballots are sent with expedited shipping to the voter's new county in Washington. The suspended ballot must be sent to the new county as soon as possible, but not more than two business days after receipt. Suspended ballots received between seven days after election day and prior to certification shall be mailed to the voter's new county within one day of receipt. Following certification, suspended ballots are mailed to the voter's new county for retention.

(c) Processing of current and suspended ballots:

(i) If the voter's current ballot is received and accepted for tabulation prior to the seventh day after election day, the suspended ballot becomes invalid;

(ii) If the voter's current ballot is not received prior to the seventh day after election day, duplicate the suspended ballot onto the precinct ballot that matches the voter's current registration record.

(d) Verification of the signature and postmark on the ballot declaration by the county of current registration;

(e) Removal of the security envelope or sleeve from the return envelope;

(f) Removal of the ballot from the security envelope;

(g) Manual inspection for damage, write-in votes, and incorrect or incomplete marks;

(h) Duplication of ballots;

(i) Digital scanning and resolution of ballots by batch where tabulation does not take place; and

(j) Other preparation of ballots for final processing.

(4) Initial processing of voted ballots may begin as soon as voted ballots are received. Initial processing includes digital scanning and resolution of ballots where tabulation does not take place. All ballots must be kept in secure storage until final processing. Secure storage must employ the use of numbered seals and logs, or other security measures which will detect any inappropriate or unauthorized access to the secured ballot materials when they are not being prepared or processed by authorized personnel. The county auditor must ensure that all security envelopes and return envelopes are empty, either by a visual inspection of the punched hole to confirm that no ballots or other materials are still in the envelopes, or by storing the envelopes with a tie, string, or other object through the holes.

(5) Final processing of voted ballots, which may include scanning ballots on an optical scan voting system, may begin after 7:00 a.m. on the day of the election. Final processing may begin after 7:00 a.m. the day before the election if the county auditor follows a security plan that has been submitted by the county auditor and approved by the secretary of state to prevent tabulation until after 8:00 p.m. on the day of the election.

(6) Tabulation may begin after 8:00 p.m. on the day of the election.

(7) In counties tabulating ballots on an optical scan vote tallying system, the vote tallying system must reject all overvotes and blank ballots.

(a) All rejected ballots shall be outstacked for additional manual inspection.

(b) The outstacked ballots shall be inspected in a manner similar to the original inspection with special attention given to stray marks, erasures, and other conditions that may have caused the vote-tallying device to misread and reject the ballot.

(c) If inspection reveals that a ballot must be duplicated in order to be read correctly by the vote tallying system, the ballot must be duplicated.

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^{III} Journal of the Neurological Sciences, vol. 15, J. E. Mclennan, K. Nakano, H. R. Tyler, R. S. Schwab, Micrographia in Parkinson's disease, Pages 141–152, Copyright (1972).

This informational publication is intended to provide Washington State Elections Administrators guidance with regard to signature verification standards and compliance tools.

Expect this manual to be regularly updated (ESSB 5890, 2024).

It is the responsibility of the County Auditor to ensure signature verification personnel are trained and compliant with all current laws and requirements.