



The League of Women Voters of Oregon, established in 1920, is a grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

April 20, 2023

To: Senator Kate Lieber and members of the Committee
[Senate Rules Committee](#)

Re: [SB 167](#) – Administrative Elections procedural updates – **Support with Comments**

SB 167 includes over a dozen elections adjustments. The League supports SB 167, based on our foundational positions to promote and protect the right to vote, for efficiency and transparency in government, balanced with our election security position in [LWVOR Privacy and Cybersecurity](#).

Over decades, the League has collaborated with Secretaries of State and staff, commenting on Oregon Administrative Rules and Elections Manuals, and advocating on legislative issues. The League is proud of Oregon's national leadership for Vote-by-Mail and Automatic Voter Registration, frequently leading voter turnout nationally. This voter engagement reflects trust in the voting process and our dedication to educating voters on ballot issues. We have addressed voting and election issues for over 100 years. We support these bill components, with some further comments:

Efficiency and Cybersecurity:

Establish an electronic filing system.

"These aging computer programs are like the roof starting to leak. We see evidence of strain and do not want to wait further to begin remedial work from scratch in 2021"- [League testimony](#), HB 2234 (2019).

Oregonians expect efficient website access, per our state Electronic Portal Advisory Board, [EPAB](#), which reports national awards for state websites. Updating filing software would increase efficiency, be easier and safer for most candidates, and free elections staff for more personal help, as needed.

The League has long urged for a user-friendly candidate e-filing system to combine and replace ORESTAR and OCVR:

- **2023**, see our [HB 5035](#) Secretary of State funding testimony. For full circle, our support includes [HB 2049](#), for comprehensive cybersecurity and [HB 2490](#) to protect cybersecurity defense plans.
- **2022**, consider growing cyber vulnerability, [ORESTAR affected by C&E Systems ransomware](#). Software updates are a first-line defense for protecting communications chains at every link.
- **2021**, for an efficient one-stop shop for candidate filing, retain local clerks' control and fee handling. See [League testimony](#), SB 5538 Enrolled (2021). We continued to urge for statewide, online candidate filing with software revisions already underway, as described in [HB 3393 \(2021\)](#).
- **2019**, listing our **2017** collaboration efforts, our [HB 2234 \(2019\) testimony](#) pushed for e-filing,
- **2018**, Elections Director Trout, reviewing the League LC for HB 234, urged for not naming the software, local- OCVR, or state-wide- ORESTAR, since both were overdue *then* for replacement. See SoS Richardson's 2018 Newsroom "[ORESTAR Batch Transactions Processing Error](#)".
- **2017**, [CISA](#) declared Elections a critical infrastructure. Today cyber-attacks are increasing in frequency, criminal sophistication, and disruptive consequences.

Alter Special District recall filing and verification date requirements.

These are small extensions for Special Districts, which often have fewer communications resources.

Remove requirement to sign electronic signature sheets in two places.

We want voters signing petitions to focus on the issues, not the expectation that the process is ponderous.

Reduce voter registration card request quantity caps, from 5,000 to 500.

The League supports efficient and verifiable voter registration. Some voters may choose paper voter registration cards which should be current when submitted. The League has been advised that outdated printed voter registration cards would be accepted. The [Oregon Voter Registration Card](#) date is the upper right, “SEL 500 rev. 3/22” and doesn’t yet include the No-Labels Party, [Oregon Blue Book](#).

Exclude candidate debate or forum for state office from being considered candidate contribution if host uses neutral criteria, set in advance, when determining who to invite.

The League Voter Service debate policy invites all registered candidates to participate in events, especially for major state or federal level races, listing participation criteria. We require them to supply evidence of campaign viability with our established parameters. Our intention is toward inclusion for a manageably-sized candidate panel, for reasonable events that balance timing for audience retention, numbers of questions asked, reply duration, and candidate panel size.

Elections Document Language

The League supports the citizens’ right to know with informed understanding. This could be improved by making election document language more accessible. The [LWVOR Voting resources](#) in multiple formats have advisedly translated our nonpartisan content, using professional translation and review, including recordings and Braille for registered clients, Talking Book and Braille Library, Oregon State Library.

Expand languages for translating online voters' pamphlets.

This recognizes that the top five languages spoken around Oregon counties vary from the statewide percentages. The League worked on the [Minority Languages Voting Materials Report](#) (2015), which saw significant variation between counties. Note, this addresses the online state Voters’ Pamphlet, not other voting materials, the ballots, voter registration, and so forth.

Authorize the Secretary of State to alter specified election document language, provided that it does not materially change meaning.

Provision should be made for careful oversight, for translations and other language alterations, to ensure adherence to intended meaning.

Limit the time when political parties can request elector lists.

The exclusion period changes should include the final two weeks before elections and then close availability on election days. Political parties use these lists to “get out the vote”, and the lists are relevant up to election day, then are moot afterwards, when elections offices are busy processing those votes.

Personal Data and Harassment Protection

Voters are information consumers and marketed sources. The League wants to facilitate voter education communication safely in this dynamic, evolving context. Our personal data merits protection from Data Brokers, consistent with the Attorney General’s SB 619 (2023), see [our testimony](#). We submit that most Oregonians do not realize and might not agree to share their information listed in ORS 247.948 Section 3, given digital access and personal exposure. With [MyVote](#), one can find anyone’s home address if they have their birthdate.

We call for a review to combine piece-meal protections for harassment and data privacy. We should consider protections for election workers, candidates, public servants (and their households), jurors, volunteers, chief petitioners and circulators, and lawful protesters. See ORS 244.020.

- **2023**, see our [SB 166 testimony](#), for voting rights, harassment, privacy, and cybersecurity. [HB 3111](#) (2023) addresses only some personal information disclosure exemptions.
- **2022**, see our [HB 4144 testimony](#) for data privacy and harassment protection. [HB 4144](#) Enrolled (2022). Expand this election worker data privacy and harassment protection to candidates, volunteers, lawful protesters, public servants, jurors, and volunteers. See ORS 244.020.
- **2021**, a privacy protection patch was added, see our [SB 792 testimony](#), to protect children’s data on fishing license applications. Communication chains must be protected at every link to guard against extensive vulnerability. [HB 3393](#) (2021) This bill would have exempted candidate home address and telephone numbers *and omitted incumbents’ office emails and staff telephone numbers for campaign communications*. [HB 3047](#) Enrolled (2021) makes “doxing” actionable and defines harassment. [SB 293](#) Enrolled (2021) develops privacy, confidentiality, and data security recommendations.
- **2018**, we supported [SB 1551 Enrolled](#), to improve security breach rules, designed to help minimize the negative effects of identity theft. A 2016 breach was tracked to fishing license applications.
- **2017**, [SB 481](#) Enrolled (2017) addressed hundreds of disclosure exemptions. Privacy protection and disclosure are central conflicting interests. Statute should be adaptable to pertain to emails, texts, social media, etc. Our 50-year-old Freedom of Information Act did not foresee these...

Home Address: Candidate filing certification needs candidate home addresses to verify district jurisdictions but revealing where candidates live *is not defensible* with a seated legislator reporting getting a death threat. Our HB 3073 [testimony](#) lists six relevant protection bills for elections workers, from harassment to doxing, and exempting candidate and public servant home addresses from public disclosure.

- **Address Confidentiality Program:** Explicitly prohibit releasing confidential election records and Address Confidentiality Program information as public records or as part of voter (elector) lists.
- **Family members:** Add those living with election workers to address disclosure exemptions. Here, let’s amend “Household members”, to include those who reside with the public official or candidate, see ORS 244.020.

Individual signatures: Exempt signatures on [petition] sheets from public disclosure.

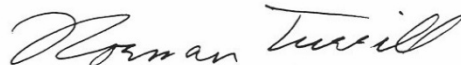
Declares emergency, effective on passage.

This allows prompt implementation. Election timelines are compact and intense. Many valuable election improvements are postponed and attention is lost in order to avoid interrupting an ongoing election cycle. We urge your support in time to implement these changes for our important 2024 elections.

We urge your support for SB 167. Thank you for the opportunity to discuss this legislation.



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