

SAFEGUARDING STAFF AND WORK ENVIRONMENT FROM COVID-19



This document is one in a series created as part of the Election Infrastructure Government Coordinating Council and Subsector Coordinating Council's Joint COVID Working Group. These documents provide guidance for state, local, tribal, and territorial election officials on how to administer and secure election infrastructure in light of the COVID-19 epidemic.

OVERVIEW

The health and safety of election staff is of paramount concern to election officials as they prepare to administer the November 2020 election.

Protecting staff *now* offers administrators the greatest opportunity to minimize the operational risks associated with running elections, particularly in an environment with many expected changes in voting behavior and changes to election administration processes and procedures. Unlike the management decisions concerning how voters will participate in November, work environment changes can be introduced now by election officials and modified as time goes on and the situation changes.

Much of the guidance in this document is based upon reviewing information available from [The Centers for Disease Control and Prevention \(CDC\)](#). The CDC has a “[Hierarchy of Controls](#)” for managing workplace safety and occupational hazards. Using that as a model, there are ways to make the workplace safer, including through the use of:

- ❑ Engineering measures to isolate people from the hazard (e.g., building barriers between workers who must share space).
- ❑ Administrative measures to change the way people work (rotating shifts to decrease the number of people sharing space at any given time).
- ❑ Personal protective equipment (PPE) (e.g., gloves and N-95 masks) and additional items (e.g., other masks or face coverings) to protect workers and others.

The points addressed in this document are a mix of engineering and administrative changes that can help isolate workers from the virus as much as possible and change the way they work to avoid exposure in situations where all risk cannot be eliminated.

WHAT CAN YOU, AS ELECTION OFFICIALS, DO TO PROTECT YOUR STAFF WHEN THEY ARE IN THE OFFICE?

New policies and procedures are typically administrative in nature and can be instituted more quickly than regulatory or statutory changes.

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ESTABLISH NEW PRACTICES AND NORMS IN THE OFFICE

Providing well-designed signage in the workplace to establish norms is valuable. These posters should provide clear declaratory statements regarding safety practices required for all election staff and should be posted and visible to all stakeholders. The point is to ensure your workers and the voters they serve understand what is expected of election staff. A sample poster might include a list such as:

Elections Staff Must:

- Work at least 6 feet away from other staff or use partitions if 6 feet of separation is not possible
- Stay home if sick or at higher risk of severe disease
- Wash their hands often and for at least 20 seconds (or use alcohol-based hand sanitizer when soap and water are not readily available)
- Wear their face covering
- Wear gloves (when appropriate)
- Regularly disinfect work items such as keyboards, pens, and any shared materials

IMPLEMENT OFFICE SAFETY MEASURES

- Some staff will need to access the office. Have procedures and schedules that allow for specific staff to access the building at specified times.
- Create rotating shifts for personnel that need to be on site so that you can limit the number of people in the office at any given time. Consider having a backup team that is on call if one of the shifts gets sick.
- Create workspaces within the office that adhere to social distancing protocols.

REENGINEER THE WORKPLACE TO ISOLATE STAFF

Consider engineering efforts that distance voters from staff and staff from one another. Plexiglass shields can offer some protection for shared workspaces such as conference and lunchrooms or can be used to provide a shield between members of the public and election office staff. Voter privacy shields could be used if the barrier does not need to be transparent.

It is possible to reengineer the work done in elections offices to make it easier to isolate staff and reduce the need for labor intensive in-office work. Effective policy changes that have a direct impact in this area include:

- Offering online tools such as online absentee ballot requests. This transfers most of the work to the voter, which decreases the labor needs substantially. The remaining work for election officials is done completely on screen. Election officials can more easily regulate where the workforce is stationed, particularly when it is a smaller workforce. It may even be possible to offer this type of work remotely, as described further below in [How Can You Support a Remote Elections Workforce](#).

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- Limit face-to-face interaction as much as possible.
 - Using video conferencing tools to allow workers to be in different rooms even if they are in the same facility.
 - Remember that social distancing must be balanced with security. If your jurisdiction has a two-person rule (requiring that no single individual has access to critical software systems or certain paper election records) the rule should be followed to ensure confidence in the custody process; consequently, other safety measures should be implemented. Two-person situations may be appropriate places for PPE use.
 - If your state requires bipartisan teams or boards to review paper voter registration or absentee ballot applications, consider having an employee scan all paper from the office and conduct application review via screen share or conference call. These sessions could be recorded or broadcast to meet legal requirements or as a transparency measure.
 - Sharing physical documents with coworkers will be particularly challenging. If documents cannot be shared digitally consider having staff examine documents without taking them directly from coworkers—worker A places the item for review on a table and backs away before worker B approaches the table to review. Wearing gloves and/or hand hygiene measures can also mitigate risk when sharing physical documents.
- Be mindful of social distancing when developing staff training. A commitment to training and education cannot be ignored given the numbers of temporary workers needed to execute an election. Generally, staff training is done one-on-one or in a classroom style, sometimes with equipment brought in for new staff to touch and experience. Given the current situation, physically touching equipment is made more difficult, but training in general remains critical. Try to offer as many training opportunities online as possible. This can be a video of lectures, up-close videos of voting equipment, or videos of procedures. Sometimes the most valuable part of training is the questions and answers, so try holding online video conferences to interact with your workers. Do not let the perfect be the enemy of the good.

REGULARLY DISINFECT THE OFFICE WORKSPACE AND PROVIDE HAND SANITIZER

Certain disinfectants and alcohol-based hand sanitizers can be effective in killing COVID-19. Consult this [list of Environment Protection Agency \(EPA\)](#)-approved disinfectants that are effective against COVID-19. However, disinfectant products and alcohol-based hand sanitizers have been in high demand, and supply chain issues may continue through the election in November. Election officials can endeavor to mitigate these issues by:

- Placing orders as early as possible through the normal procurement process for your jurisdiction, while looking for alternatives. This is especially true because your government procurement office may play some role in distributing the supplies it can acquire, and you may find your office forfeiting supplies to other critical functions such as healthcare systems, public safety, and jails.

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- Seeking products outside normal or preferred purchasing channels, including from local distilleries for hand sanitizer. It will be important to determine the regulations or emergency purchasing powers of the office.
 - [Interactive map](#) from the Distilled Spirits Council of the United States
 - [List from](#) the American Craft Spirits Association

PROVIDE PROTECTIVE GEAR

Gloves, masks, and protective clothing all offer some protection and may give poll workers and voters confidence that election officials are taking health and safety seriously.

- Gloves are advised for workers interacting with the public or when handling documents, such as mail, that was previously handled by others. Gloves, however, are only as good as the behaviors of the person wearing them—if the user touches a contaminated surface and then touches his or her face while wearing gloves, he or she has compromised the purpose of the gloves.
- Masks or other face coverings are important. The CDC recommends that people in public wear face coverings to contain their own droplets in case they are carrying or shedding the virus. For the election purposes discussed in this document, N95 masks are not required, and items such as bandannas or otherwise homemade mouth covers can be better than no protection. For public-facing staff, this is also a potential opportunity to brand the election for the local administrator: (e.g., “Protect the Poll Workers” or “#DemocracyBeatsCOVID100%”).
- Other protective equipment may or may not be valuable as the election nears. For example, additional protective gear (e.g., N-95 masks, eye protection, and isolation gowns) could be helpful for election staff working closely in the office or when serving voters believed to be carrying COVID-19. Videos and written guidance on how to properly put on and take off PPE are provided on the [CDC website](#).

MANAGE EMPLOYEES PREVIOUSLY EXPOSED TO COVID-19

To support continuity of operations, you may need to accommodate employees who are known to have been previously exposed to the virus, but currently do not show symptoms. The CDC recently [published guidance](#) for managing essential workers who have been exposed to COVID-19, along with a simplified [list of do's and don'ts](#). Subject to applicable employment laws and regulations, election officials should consider taking the temperatures of all employees before each work shift. Any workers with elevated temperature should be sent home.

MAINTAIN TRANSPARENCY TO INSTILL PUBLIC CONFIDENCE

Some work in elections must be done in public and includes robust participation from observers. Usually that means having observers physically share space and observe the election process. However, there are ways to reengineer some processes in light of public health guidelines to isolate the observers and better protect the workers.

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For example, live streaming events that must happen publicly, such as equipment preparation, mail ballot signature validation, or provisional ballot adjudication, can encourage interested parties to observe from home rather than in person. Nearly all the major social media companies offer video streaming platforms (sometimes at no cost), and others can be used at low or no cost to make these activities accessible to the public at home. Many jurisdictions already stream these meetings for the public benefit. Even though live streaming is not a perfect substitute for in-person observation, it is advisable in the current environment. Considerations for election officials considering live streaming election-related events include:

- Deciding which angles to film from, and how many. This can take time and may require modifying operations slightly to meet the available technology. For example, those essential employees participating in person may need to narrate what they are doing or bring items to the camera for the benefit of online viewers.
- If the video feed is disrupted and there are viewers, it may be necessary to halt operations.
- If the office already has security cameras and the video feed is visible and recorded, it may be possible to push that to your website.
- Social media companies offer streaming services that are free and generally reliable options.

If live streaming these events is not viable, you should utilize other measures for social distancing that are described for maintaining *Health and Safety at Polling Places* and *In-Person Voting Consideration* on the CISA [COVID-19 & Elections](#) webpage.

HOW CAN YOU SUPPORT A REMOTE ELECTIONS WORKFORCE?

Election officials hire staff for tasks such as data entry and validation of voter registration or mail ballot requests. Although the paper record for these tasks is needed, these processes can all be done with a computer and network connection.

PERFORM SOME TASKS REMOTELY

You must be sure to maintain the chain of custody for all election artifacts, but some processes can be conducted remotely if hardcopy originals are scanned and securely shared with necessary employees. Such tasks include:

- Manual work that is entirely computer based and does not require a paper artifact in hand, such as:
 - Voter registration data entry, referring to scanned originals
 - Vote by mail request data entry, referring to scanned originals
 - List maintenance work
 - Data entry work that comes from Internet service portals, such as Online Voter Registrations (OVR) and online mail ballot requests

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- Phone-based work
 - Recruitment and confirmation of poll workers
 - Recruitment and confirmation of polling places

SECURE DOCUMENTS AND ASSETS REMOVED FROM THE OFFICE

- Be sure to maintain and document the chain of custody for all documents and assets that are removed from the elections office and received outside of the office.
- Provide the necessary resources and training on how to secure critical assets and sensitive information that staff will be maintaining outside of the office such as filing cabinets and banker bags.
- Manual work that does not have a scanned image corresponding to the required data entry is generally not suitable for remote work. This includes:
 - Voter registration data entry without scanned images
 - Vote by mail data entry without scanned images

ESTABLISH CYBERSECURITY MEASURES FOR REMOTE WORK

Remote work can mean that systems are connecting to computers outside the traditionally closed network. Some general guidance provided by partner organizations listed below in the “[Remote Workforce Resources](#)” includes updating and instituting some basic controls such as:

- Ensure that remote access using virtual private networks (VPNs) is up to date.
 - Hopefully, this technology and its use is native to the organization. If not, there are plenty of VPN services online; some are free, and others can be purchased and enabled on external devices.
 - Some helpful information is available at:
<https://www.globalcyberalliance.org/five-simple-steps-to-protect-yourself-and-your-organization-while-working-and-studying-remotely/>
- Require strong passwords and multifactor authentication.
- Turn on the automatic updates for routers and modems.
- To the extent law and policy allow, require staff to secure their home wireless networks:
 - Turn on the automatic updates for routers and modems
 - Turn off WPS and UPnP
 - Turn on WPA2 and WPA3
 - Configure Router/Modem Firewall
 - Secure systems that allow remote access—ensure that VPNs are fully patched
 - Ensure antivirus software on endpoints is up to date

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At the office, IT staff should prepare for enhanced monitoring of your systems.

- Ensure any Intrusion Detection Systems (IDS) are fully installed, up to date, and being monitored.
- Ensure Intrusion Prevention Systems (IPS) are fully installed, up to date, and being monitored.
- Push out a broad and liberal “See Something, Say Something” policy to make sure the staff recognizes there is no such thing as overly cautious in these circumstances.
- Protect the endpoints connected to systems that are under control of state and local officials.
 - Where possible, provide the hardware and connection protocols to the workers for devices such as laptops or tablets.
 - Desktop as a Service (DaaS) solutions can also be valuable.
- See [Resources](#) below for additional guidance.

ADDRESS IMPACTS ON IT DEPARTMENT

Now that IT support may be required outside the traditional office environment, users will need phone or remote access-based IT support. Election officials and IT must work together to determine whether access to critical systems should be permitted through personal devices, which can add additional costs and considerations, but may be necessary if election staff are not provided government-issued portable hardware.

- Government-issued hardware may be easier to keep up to date and patched.
- Government-issued devices are subject to government rules concerning personal use, privacy, and monitoring of activity.
- Government offices have limited control over personal devices.
- If the government allows the use of personal devices, their use should include the following conditions:
 - Require, to the extent law and policy permit, that all security features are on, including passwords, biometric authentication, etc.
 - Require, to the extent law and policy permit, the device be patched and updated. That can be difficult to enforce but perhaps having staff send versioning screenshots on “patch Tuesday” could work.

RECOGNIZE RISKS TO THE ASSETS AND INFORMATION

Remote access to information and systems comes with many risks that are exacerbated if there are not proper controls, for both digital and paper records, in place. General data management protocols should be given significant attention. Consider the following examples: What if someone brings paper home and then loses it, destroys it, or copies it? What if someone does not secure his or her device at home?

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Consider all the implications of remote work and to which system and processes you are allowing additional access.

BUILD AWARENESS OF THE THREATS

Workers at home may be more susceptible to cyber-attacks, which can affect the business network. For instance, use of personal equipment and accounts that may not have the same controls as your business network puts the business at risk. There are opportunities for the organization and employees to increase their awareness and training of these additional risks to the business network in a work-from-home environment. Consider the following actions:

- ❑ Conduct phishing campaign assessments (PCA) with your staff while working from home.
- ❑ Implement vulnerability (a.k.a. Cyber Hygiene) scans and remote penetration testing (RPT).
- ❑ Incentivize Cyber Security Trainings. All election officials have free access to the federal virtual training environment (FedVTE).
 - ❑ Note: These services and others are offered at no cost to SLTT partners. All CISA services can be located in the [CISA Election Infrastructure Security Resource Guide](#). To request services contact CISAServiceDesk@cisa.dhs.gov.
- ❑ Ensure that staff are members of the EI-ISAC Member by going to <https://www.cisecurity.org/ei-isac/>.
 - ❑ Members of the EI-ISAC can also use the Homeland Security Information Network (HSIN).

WHERE TO START

- ❑ Update Continuity of Operations Plans to account for this expanded labor force.
- ❑ Ensure that Incident Response Plans and trainings are up to date.
- ❑ Ensure the organization is ready to provide IT support to the extended workforce and their different environments.
- ❑ Build strong policies to help limit the variation in practices that IT needs to support.

RESOURCES

Remote Workforce

- ❑ [CISA Insights: Risk Management for COVID 19](#)
- ❑ [CIS Guidance: Network Security Remedies for Telework](#)
- ❑ [Global Cyber Alliance: Work from Home](#)
- ❑ [NIST: Telework Overview and Tips](#)

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Cybersecurity and Infrastructure Security Agency (CISA)

- **CISA Coronavirus webpage**—This page provides information on CISA's efforts with federal partners concerning coronavirus and COVID-19 and links to other federal resources.
- **CISA Insights: Risk Management for Novel Coronavirus (COVID-19)**—This brief provides recommendations on how to address physical supply chain and cyber security issues that may arise from the spread of the novel coronavirus. This resource is helpful for election officials to prepare for possible impacts of the novel coronavirus.

Center for Disease Control and Prevention (CDC)

- **CDC Situation Summary webpage**—This page provides updated information and guidance on the novel coronavirus and COVID-19.
- **CDC Coronavirus index webpage**—This page provides links to all CDC resources on the novel coronavirus and COVID-19.
- **CDC List of State and Territorial Health Department Websites**—This page provides links to all websites of state and territory health departments, which the CDC recommends consulting for state-specific information on the novel coronavirus and COVID-19.
- **CDC Recommended Precautions for Preventing Spread of COVID-19 in Election Polling Locations, including Cleaning and Disinfection**—This guidance provides recommendations on the routine cleaning and disinfection of polling location areas and associated electronic equipment. It suggests actions that poll workers can take to reduce the risk of exposure to COVID-19 by limiting the survival of the virus in the environment. According to the CDC, this guidance will be updated if additional information becomes available.
 - There is a section on recommendations for processing mail-in ballots. The CDC states that workers handling mail in ballots should practice hand hygiene frequently and no additional precautions are recommended for storage of ballots.
- **CDC Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19), February 2020**—This interim guidance for businesses may be relevant to election offices. It seeks to help prevent workplace exposures to acute respiratory illnesses, including COVID-19, in non-healthcare settings. The guidance also provides planning considerations if there are more widespread, community outbreaks of COVID-19.

Election Assistance Commission (EAC)

- **EAC Disaster Preparedness and Recovery webpage**—This page features presentations from election administrators about how they conducted elections in the face of a variety of natural disasters. Their examples of preparedness and recovery could be helpful for election officials as they address the novel coronavirus and COVID-19.

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- **EAC Contingency Plans webpage**—This page describes preparation for the 2016 elections, the EAC collected continuity of operations plans (COOPs), and resources from election officials at the state and local levels. This includes state-specific examples for H1N1 flu preparedness.
- **EAC Election Management Guidelines Chapter 11: Contingency Planning and Change Management**—This 2009 resource was created to assist state and local election officials in effectively managing and administering elections. Each chapter explores a different aspect of election administration and provides examples and recommendations.
- **Vendor Manufacturer Guidance on Cleaning Voting Machines and Other Election Technology**—This resource was created to track vendor specific guidance.

This document was finalized on May 28, 2020. The situation and resultant guidance are subject to change. For current public health guidance relating to COVID-19, see [coronavirus.gov](https://www.cdc.gov/coronavirus). Election officials should also consult their state and local laws, including any applicable executive orders, regarding social distancing and other required or recommended public health practices (such as the wearing of masks by non-medical personnel).