



Office of Inspector General | United States Postal Service

RISC Report

Vote by Mail and the Postal Service: A Primer

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NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

OFFICIAL
ELECTION MAIL
Authorized by the U.S. Postal Service

PERMITS BALLOTING MATERIAL
REPLY MAIL
WASHINGTON

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Executive Summary

The U.S. Postal Service delivered more than 135 million ballots to or from voters in the 2020 general election. Vote by mail had been growing steadily in usage in the United States, even before the novel coronavirus disease (COVID-19) pandemic caused millions of voters to cast mail ballots for the first time in 2020.

The vote-by-mail process is decentralized and widely varied, with a patchwork of laws and procedures from state to state. As an increasing number of voters have chosen to vote by mail, variations in these laws and procedures have created challenges for the Postal Service, which manages the handling and delivery of these ballots on a national scale. In this white paper, the U.S. Postal Service Office of Inspector General's (OIG) objective was to provide an overview of vote-by-mail processes, variability of those processes, and challenges for the Postal Service and others within these processes. We did not examine temporary changes made in 2020 due to COVID-19.

The decentralized nature of elections is rooted in the Constitution, which gives states the power to determine the time, place, and manner of elections. Within the states, elections are generally administered locally. At a high level, the vote-by-mail process involves local election officials (often with the help of private vendors) designing, printing, and mailing ballots to voters who request them — or, in five states that vote primarily by mail, to every registered voter. The voters fill out the ballots and return them to the election office, typically by mail or via a secure drop box. Election officials verify and count the ballots to determine the election results. Nearly two-thirds of the states then audit the election process to ensure the election's integrity.

One challenge the Postal Service faces is that states, ballot printers, and local jurisdictions do not always follow best practices when designing and mailing ballots. For example, not all election officials utilize the Postal Service's ballot-specific Intelligent Mail barcode, which allows USPS to identify the mailpieces as ballots and track them in the mailstream. Likewise, some ballot envelopes are designed with physical characteristics that make them less efficient for the Postal Service to process and can lead to delays. To ameliorate these types of issues, the Postal Service has created nationwide networks of Election Mail Coordinators, who help election officials through the vote-by-mail process, and

Highlights

The Constitution gives power over elections to the states, which generally allow county and local offices to administer elections. As a result, the vote by mail process is decentralized, with more than 10,000 election jurisdictions nationwide.

Since 1996, there has been a shift toward vote by mail in the U.S., with five states now sending mail ballots to all registered voters.

Many of the deadlines for requesting and returning ballots may not allow sufficient time for the blank ballots to travel through the mail to voters and for completed ballots to reach election officials in time to be counted.

To deliver ballots by election day, the Postal Service has historically taken additional measures to expedite ballot delivery.

The Postal Service has communicated and coordinated with state and local election officials to address challenges, but more could be done.

Mailpiece Design Analysts, who assist with ballot envelope design and can verify mailpiece compatibility with postal equipment.

Another key challenge in the process revolves around the statutory deadlines for when voters can request a mail ballot and when the completed ballots must be received by election officials. In most states, these deadlines do not allow sufficient time for the ballots to travel to and from voters through the mail — particularly if election officials send outgoing ballots using Marketing Mail, which comes with a lower postage rate than the alternative First-Class Mail, but also comes with a longer three-to-10-day delivery standard. Adding to this, ballot and

envelope vendors may be located far away from the election jurisdictions where the ballots will be used, causing the ballots to travel farther through the Postal Service's network. The statutory deadlines create a risk that the completed ballots will not reach election officials in time to be counted. To deliver ballots within the shortened timeframes, the Postal Service has deployed additional resources and instituted what it calls "extraordinary measures" during elections to expedite ballot delivery. Despite these efforts, an estimated 114,000 mail ballots were rejected in the 2018 general election because they arrived too late.¹ Elections experts have called on states to amend their laws to better align with the Postal Service's standard delivery windows.

Another challenge is that some states require return ballots to bear a postmark as proof that they were mailed before the ballot return deadline. However, many

ballots are among the types of mail that would not typically be postmarked under postal processes. To accommodate state requirements, the Postal Service has altered its processing practice during elections to postmark all return ballots it identifies in the network, and states could use the data from a ballot's barcode to serve as evidence for when it was mailed.

While many of the challenges surrounding vote by mail are outside of the Postal Service's direct control, it should continue to work with election officials to improve the process. Recent OIG election mail audits have called on the Postal Service to make a number of changes related to vote by mail, which include the creation of a new mail product exclusively for election mail. As vote by mail plays an increasing role in American democracy, the Postal Service can continue to help ensure the process runs smoothly.

¹ Nationwide ballot rejection data from the 2020 general election were not available at the time of this paper's issuance.

Observations

Introduction

More voters than ever cast mail ballots in the November 2020 United States general election.² As states, election administrators, and voters opt to use the mail for elections, it becomes more important for everyone to better understand the nuances and challenges of the vote-by-mail process.³ In this white paper, the U.S. Postal Service Office of Inspector General (OIG), provides an overview of vote-by-mail processes, variability within those processes, and challenges for the U.S. Postal Service and others within these processes. This paper focused on domestic ballot mail for federal office general elections, which occur in November on even-numbered years.⁴ The scope of this paper centered on permanent processes, rather than the temporary process or policy changes that states and election officials implemented in 2020 due to the unique circumstances presented by the novel coronavirus disease (COVID-19) pandemic.

To meet our objective, we analyzed postal policies; reviewed state laws and regulations; reviewed existing vote-by-mail reports and studies from other federal agencies; and reviewed materials published by external groups and experts that study and monitor elections and election policy. In addition, we interviewed postal management, an elections expert who is a former member of the Presidential Commission on Election Administration, and an executive from a large ballot printer. We further examined the vote by mail process in five states: California, Mississippi, Ohio, Washington, and Wisconsin. The objective, scope, and methodology are described in more detail in [Appendix A](#).

Use of Vote by Mail has Grown

There are three principal ways that people can vote: in-person on election day; early in-person; or by absentee ballot.⁵ Historically, the term “absentee ballots” referred to ballots cast outside a polling place by voters who would be absent from their voting area on election day. However, the terminology has evolved as states have expanded vote by mail, allowing some voters to make it their default voting method. The terms “absentee ballot” and “mail ballot” are used interchangeably in this report to refer to ballots that are mailed to voters in advance of the election. Voters can choose to submit their completed mail ballot through a method other than the mail, such as via a drop box.⁶

In the 1996 general election, 89 percent of votes were cast in-person on election day.⁷ But since then, there has been a gradual shift towards voting early in-person and by mail. Between 1996 and 2016, absentee voting increased steadily from 8 percent of votes to 21 percent as states adopted policies that made the process easier. Amid the COVID-19 pandemic, there was a significant drop in voting in-person and a large increase in vote by mail in 2020, with 46 percent of votes cast by absentee ballot. [Figure 1](#) further illustrates these shifts. An MIT survey of voters who cast mail ballots in 2020 — half of whom had not typically voted by mail before — found that 81 percent were somewhat or very likely to vote by mail again in the future.⁸

2 The U.S. Postal Service delivered more than 135 million ballots to or from voters in the November 2020 election. The full number of ballots delivered is unknown, as some ballots did not utilize the electronic markers necessary for the Postal Service to identify the mailpieces as ballots. U.S. Postal Service, *2020 Post-Election Analysis: Delivering the Nation's Election Mail in an Extraordinary Year*, January 12, 2021, https://about.usps.com/newsroom/national-releases/2021/usps_postelectionanalysis_1-12-21_georgia.pdf, p. 2.

3 We use the terms “election officials” and “election administrators” interchangeably to refer to the officials working at different levels of government to administer elections.

4 Military and overseas absentee ballots are subject to different processes than those described in this white paper. For details, see: <https://www.fvap.gov/eo/overview/sending-ballots>.

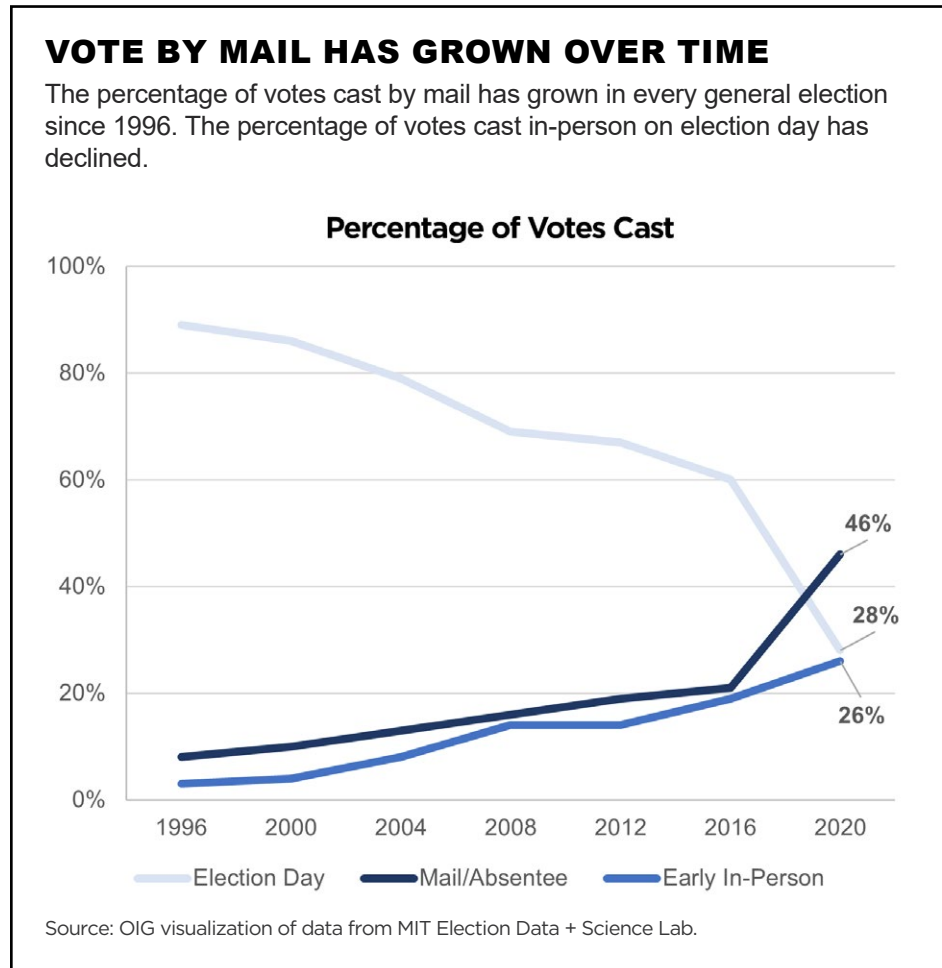
5 U.S. Congressional Research Service, *Early Voting and Mail Voting: Overview & Issues for Congress*, March 27, 2020, <https://crsreports.congress.gov/product/pdf/IF/IF11477>, p. 1.

6 For more details on the terminology, see the Introduction section of: National Conference of State Legislatures, *Voting Outside the Polling Place: Absentee, All-Mail and other Voting at Home Options*, September 24, 2020, <https://www.ncsl.org/research/elections-and-campaigns/absentee-and-early-voting.aspx>.

7 Charles Stewart III, “How We Voted in 2020: A First Look at the Survey of the Performance of American Elections,” MIT Election Data + Science Lab, December 15, 2020, <http://electionlab.mit.edu/sites/default/files/2020-12/How-we-voted-in-2020-v01.pdf>, p. 2.

8 *Ibid.*, pp. 10-11.

Figure 1: Voting Modes Over Time



The Vote-by-Mail Process

There are nine high-level steps in the vote-by-mail process, as shown in Figure 2. The details of the process can vary depending on the state and the local election jurisdiction.

Election Candidates are Finalized

The vote-by-mail process begins once candidates for election are selected. For a general election taking place in November, candidates are determined through a primary election, a caucus, or both. The timing of this process varies by state, along with whether it is a presidential or state primary.⁹ Dates for primaries and caucuses range from February to September depending on the state. The range in dates provide election administrators, ballot printers, voters, and the Postal Service inconsistent amounts of time to work through the other steps in the vote-by-mail process.

Election Officials Design the Ballots

Election officials design the physical ballots to be mailed, as well as the envelopes and any accompanying inserts or instructions. For some states, such as California, there is a flexible ballot template that election officials statewide can follow.¹⁰ In other states, each jurisdiction can design its own ballot.¹¹ Generally, there are two types of envelopes to design: the envelope that contains the outgoing ballot to the voter and the return envelope that gets delivered back to the election office, an example of which is shown in Figure 3. Ballot envelopes will generally include an identifier that is personalized to the individual voter.¹² The design of the ballot envelope is among the most important aspects of the vote-by-mail process for the Postal Service, as it heavily influences the Postal Service's visibility of the ballots in the mail and its ability to efficiently process and track them. Challenges presented by ballot envelope design are discussed further below.

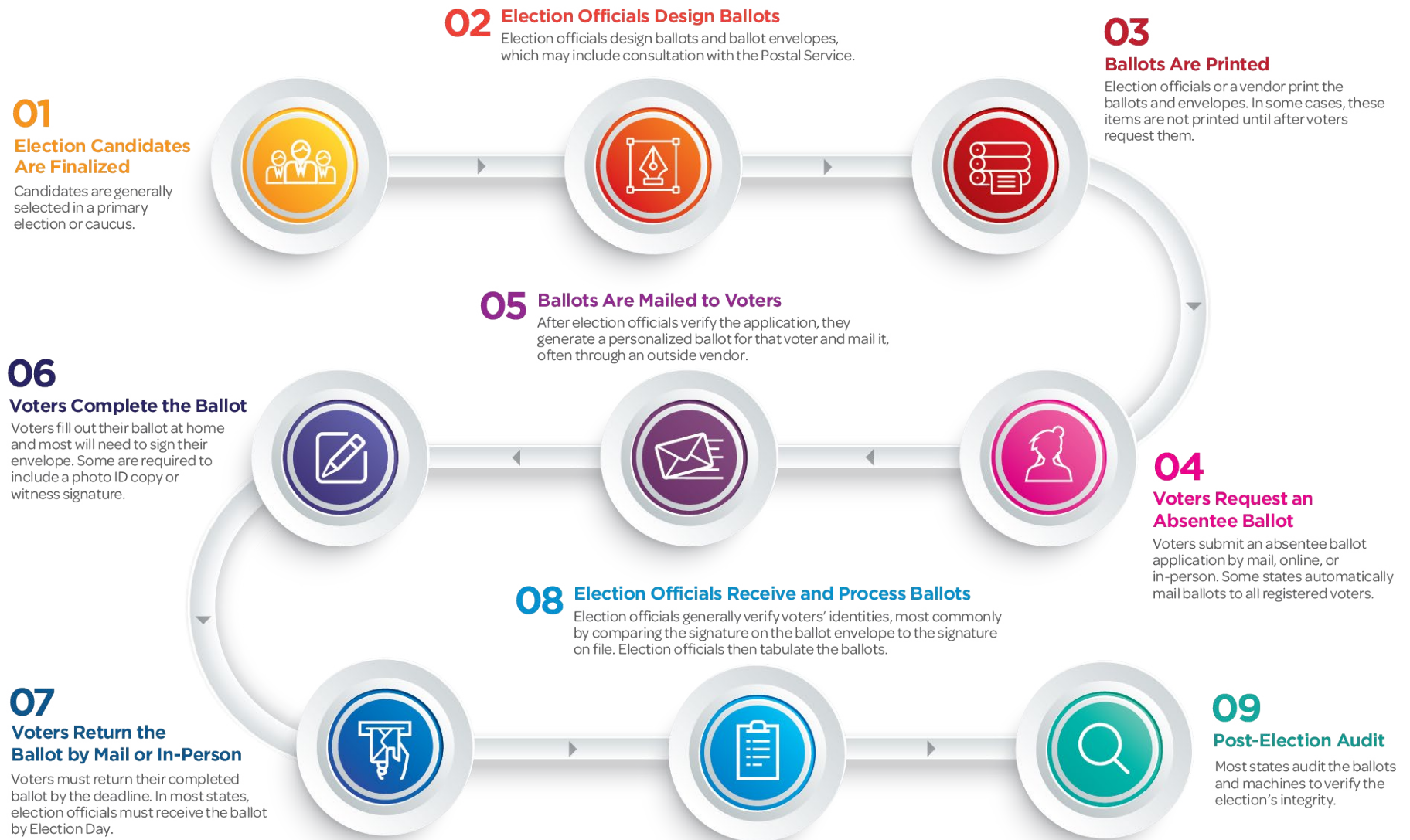
9 National Conference of State Legislatures, *Primaries: More than One Way to Find a Party Nominee*, January 19, 2021, <https://www.ncsl.org/research/elections-and-campaigns/primaries-more-than-one-way-to-find-a-party-nominee.aspx>.

10 California's statewide guidelines and templates for vote-by-mail materials can be found here: <https://elections.cdn.sos.ca.gov/vote-by-mail/pdf/guidance.pdf>.

11 Center for Civic Design, "Designing Vote at Home Envelopes and Materials," <https://civicdesign.org/fieldguides/104-designing-vote-at-home-envelopes/>.

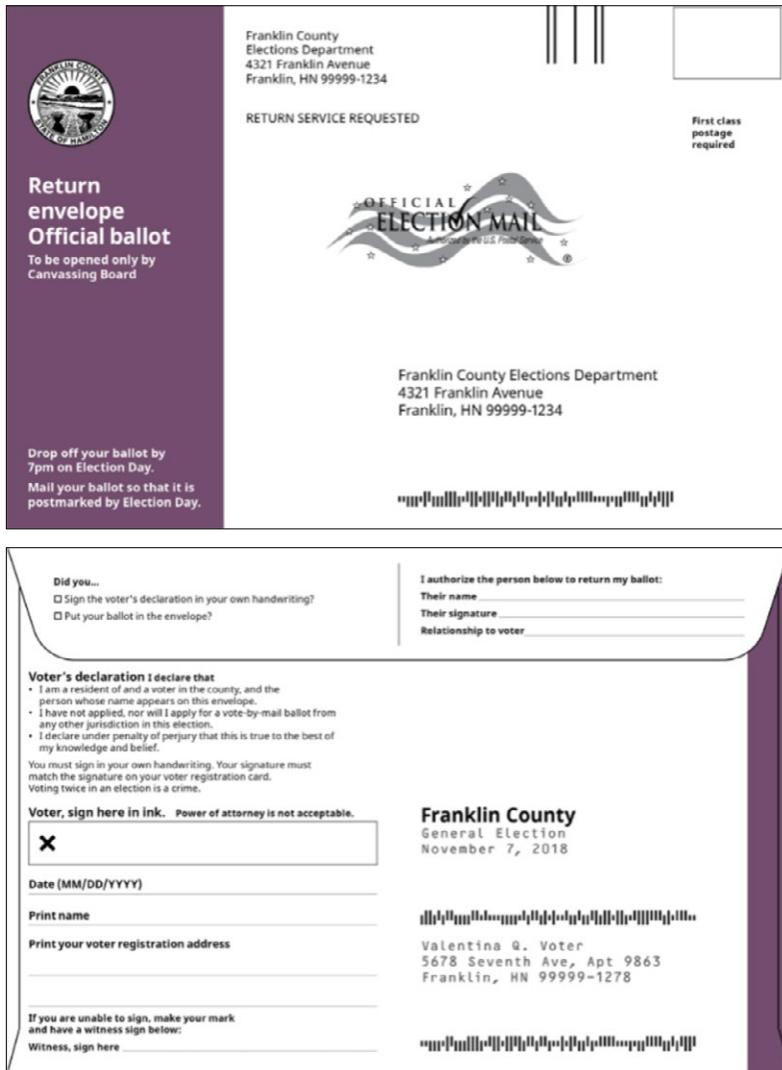
12 Lisa Danetz, "Mail Ballot Security Features: A Primer," Brennan Center for Justice, October 16, 2020, <https://www.brennancenter.org/our-work/research-reports/mail-ballot-security-features-primer>.

Figure 2: Vote by Mail Process Flow



Source: OIG

Figure 3: Sample Ballot Envelope



Source: Center for Civic Design.

Ballots Are Printed

Local election administrators coordinate the printing of the physical ballots, either through a private vendor or in-house. Ballots are paired with personalized envelopes bearing the name and address of each specific voter. Some jurisdictions preprint the ballots and then personalize them after voters request them. Other jurisdictions opt to print ballots and envelopes daily for the specific voters who request them via an absentee ballot application. Election officials often use vendors to both print and mail the ballots, sometimes from a different part of the country than the jurisdiction where the ballots will be used. In the 2020 general election, about 15 percent of outgoing ballots were mailed from a different state than the state where the voter received the ballot.¹³

Ballots are sometimes printed in and mailed from a different part of the country than the jurisdiction where they will be used.

Voters Request Absentee Ballots

Five states conduct elections primarily by mail and automatically mail ballots to all registered voters. However, in other states, voters must apply for an absentee ballot. The application process varies by state and can include a mail-in form, an in-person application at an election office, or a submission through an online portal. Sixteen states require voters to meet specific criteria to vote by mail.¹⁴ More information about state policies on mail-in ballots is included below.

Ballots Are Mailed to Voters

In states that require an application, election officials will verify a request prior to sending the absentee ballot. In 31 states, applications are verified by comparing them to the information and signatures in the statewide voter registration database. The correct ballot is then matched to the voter based on their precinct and language preferences, and bundled with other materials (such as instructions, secrecy sleeves, and “I Voted” stickers) into a personalized envelope with the voter’s name and address. The Postal Service recommends that ballot envelopes carry a unique Intelligent Mail barcode (IMb), which makes

¹³ The portion of ballots that crossed state lines is based on OIG analysis of ballot scan data, which only includes ballots mailed with barcodes that allow them to be identified as ballots. It is unclear what portion of these ballots were printed in a different state than the election and what portion were mailed to absentee voters, such as college students, who reside in a different state than the state where they vote.

¹⁴ National Conference of State Legislatures, *Voting Outside the Polling Place*.

the ballot trackable, and a ballot Service Type Identification (STID). The STID is a code included in the IMb that allows the Postal Service to easily identify ballots in the mailstream. The Postal Service also provides election officials with bright green tags that should be used to mark containers with ballots. This helps postal workers visually identify ballots as they enter processing facilities and delivery units.

The Postal Service does not have a dedicated election mail product. Accordingly, election administrators can opt to send outgoing ballots to voters as First-Class Mail, which has a two-to-five-day delivery window, or as Marketing Mail, which is priced lower but has a three-to-10-day delivery window.¹⁵

The Postal Service does not have a dedicated election mail product. Election officials can opt to send ballots to voters as First-Class Mail or Marketing Mail.

Voters Fill Out Ballots

Upon receipt of the ballot, voters select their candidates and often must take additional steps to ensure the validation of their vote. Voters need to follow specific instructions when completing their ballot, such as using a pen or putting their ballot in a secrecy sleeve first instead of just a return envelope. Unlike voting at a polling place, where help is immediately available and mistakes can be corrected, voters with mailed ballots may have to consult a website or call a phone number to get help managing any challenges with their ballot.

Voters typically must establish their identity through a signature, usually on the return envelope. In two states, a copy of an ID must be submitted with an absentee ballot. In 11 states, voters must include at least one witness signature on their ballot envelope or have it notarized.¹⁶

Voters Return Completed Ballots

All states allow voters to return absentee ballots through the mail. However, most states offer alternate return options, such as returning the ballots at the election office, a drop box, or an early in-person voting location. In the 2016 general election, an estimated 67 percent of absentee voters returned their ballots through the mail. The proportion declined to 53 percent in 2020, as a large number of participants were voting by mail for the first time and opted to use other options for return, such as secure drop boxes.¹⁷

All return ballots are sent as First-Class Mail, given that they do not meet the Postal Service's criteria for Marketing Mail because they are single-piece items. In 17 states, election administrators are required to include prepaid postage envelopes. At least one state (New Jersey) allows local jurisdictions to determine whether to supply the return postage.¹⁸ Typically, election administrators that supply postage choose to use Business Reply Mail. Doing so allows them to only pay return postage for the ballots that are actually mailed back, as opposed to prepaying for return postage on all mail ballots sent to voters. In cases where

If a voter forgets to put a stamp on their return ballot, the Postal Service will still deliver it to the election office without delay.

voters must supply the postage but forget to do so, the Postal Service will still deliver the ballots without delay. Postal Service policy is to attempt to collect postage due from the local election office at the time of delivery, and to deliver ballots even if the receiving office refuses to pay.¹⁹

While 32 states require all mail-in ballots to be received by election day, 18 states and Washington, D.C., allow mail-in ballots to be counted if received later, so long as they are postmarked on or before election day. Postal Service postmarking procedures will be discussed in more detail below.

15 The Postal Service announced in March 2021 that it planned to adjust its First-Class Mail service standards. The Postal Service expects those changes to have minimal impact on election mail. For more information on the proposed changes, see: U.S. Postal Service, *Delivering for America: Our Vision and Ten-Year Plan to Achieve Financial Sustainability and Service Excellence*, March 23, 2021, https://about.usps.com/what/strategic-plans/delivering-for-america/assets/USPS_Delivering-For-America.pdf, p. 26.

16 National Conference of State Legislatures, *Voting Outside the Polling Place*. Note these are not mutually exclusive requirements, and some states require both an ID and a witness.

17 Charles Stewart III, "How We Voted in 2020: A First Look at the Survey of the Performance of American Elections," p. 2.

18 National Conference of State Legislatures, *Voting Outside the Polling Place*.

19 Postal managers were unable to provide information on the amount of shortpaid ballot postage or the Postal Service's success rate in collecting postage due from election officials.

Election Officials Receive and Count Completed Ballots

After receiving a completed ballot, the first step for election officials is typically to verify the voter's identity. This is most commonly done by comparing the signature on the outside of the ballot envelope to the signature on file for that voter.²⁰ Eighteen states will allow voters to attempt to “cure” ballot problems, such as signature issues, by contacting the voter to come to the election office to correct their ballots.²¹ However, the other states do not require election officials to allow voters to cure ballot problems. In the 2018 general election, more than 120,000 mail ballots were rejected due to mismatched or missing voter signatures on the return ballot.²²

More than 120,000 mail ballots were rejected in the 2018 general election due to mismatched or missing signatures.

The timing of when election administrators can begin processing and counting mail ballots varies across states. Thirty-four states can begin processing ballots as soon as they receive them or a certain number of days before election day, while others must wait for election day.²³ In California, for instance, signature verification for some jurisdictions can begin as early as 29 days before election day, but other processing can only start 19 days before election day. In comparison, election administrators in Mississippi and Massachusetts can only begin processing ballots after the polls close on election day.²⁴

Post-Election Audits of Ballots and Machines

Thirty-six states require a post-election audit by statute, though policies on when the audit is conducted and what is audited vary by state.²⁵ These audits, which cover all modes of voting, can include verification that the outcome of the election was correct, that the ballots were cast and counted accurately, or that the machines and procedures worked properly.²⁶ This type of audit may involve manually hand-counting a portion of the paper ballots and comparing the results to the official counts. Ten states have requirements or options for audits that employ a statistical model that helps determine a random sample of paper ballots to review.²⁷ Best practices call for election officials maintain an audit trail throughout the process — from tracking the number of envelopes printed each day to logging the ballots and envelopes returned from the Postal Service.²⁸

State Adoption of Vote by Mail Varies

The U.S. Constitution gives states the authority to regulate the time, place, and manner of their elections, creating a decentralized system with a high degree of variation.²⁹ While state laws dictate the rules for elections, elections are generally administered by local elections officials working at the county or township level.³⁰ In total, there are more than 10,000 election jurisdictions in the U.S.³¹ As a result, some election processes can vary significantly, even within a single state.

20 Signature verification can be conducted by election officials, trained election workers, or by a machine. National Conference of State Legislatures, *Voting Outside the Polling Place*.

21 Ibid.

22 U.S. Election Assistance Commission, *Election Administration and Voting Survey, 2018 Comprehensive Report: A Report to the 116th Congress*, https://www.eac.gov/sites/default/files/eac_assets/1/6/2018_EAVS_Report.pdf, p. 14. Results from the 2020 Election Survey have not yet been released.

23 States also have different rules for the specific processing tasks election officials can complete. In cases where election officials can begin counting votes early, the results typically cannot be released until election day.

24 National Conference of State Legislatures, *Voting Outside the Polling Place*.

25 Some states conduct audits every election, while others only conduct them if certain conditions are met. U.S. Election Assistance Commission, *Election Administration and Voting Survey: 2018*, p. 130.

26 Recounts are different than audits and are often triggered or requested when the outcome of the election is close. National Conference of State Legislatures, “Election Recounts,” November 24, 2020, <https://www.ncsl.org/research/elections-and-campaigns/automatic-recount-thresholds.aspx>.

27 National Conference of State Legislatures, *Post-Election Audits*, October 25, 2019, <https://www.ncsl.org/research/elections-and-campaigns/post-election-audits635926066.aspx>.

28 U.S. Election Assistance Commission, *Election Management Guidelines: Ch.7*, https://www.eac.gov/election_management_resources/election_management_guidelines.aspx, pp. 3 and 8.

29 U.S. Const. art. I, § 4, cl. 1.

30 National Conference of State Legislatures, “Election Administration at State and Local Levels”, February 3, 2020, <https://www.ncsl.org/research/elections-and-campaigns/election-administration-at-state-and-local-levels.aspx>.

31 Kimball Brace, “Election Administration Basics,” Election Data Services, July 2013, <https://www.electiondataservices.com/wp-content/uploads/2013/05/BaseElectionAdmin.ppt>, p. 2.

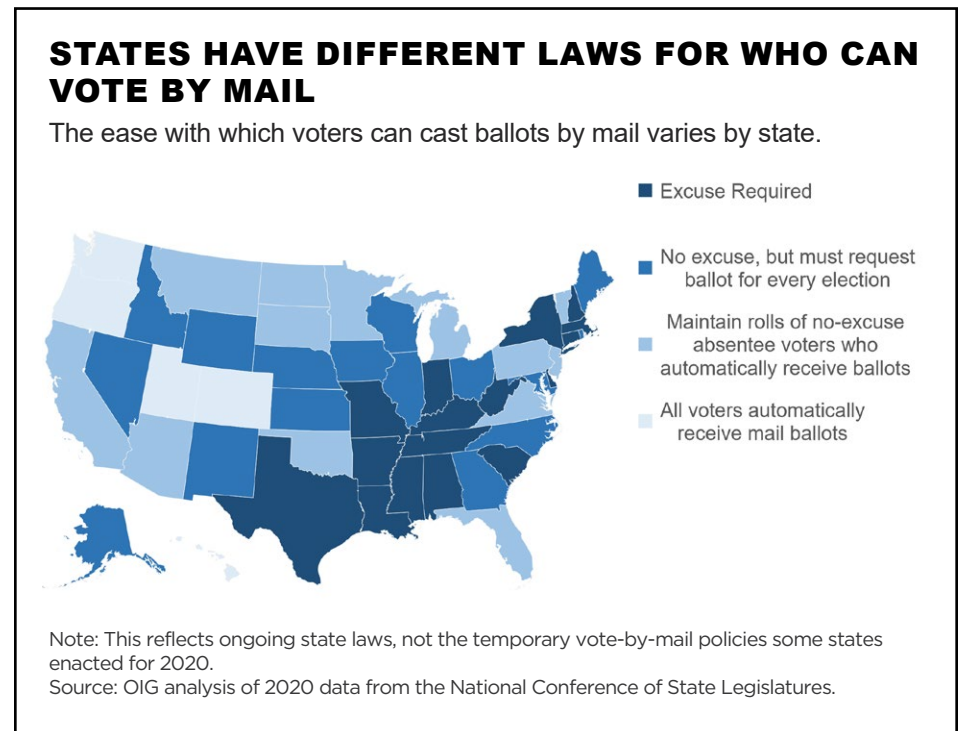
When examining the different state policies toward vote by mail, we placed states in four basic categories. These categories fall along a continuum, with each subsequent category making it easier for voters to cast ballots by mail.³²

- **Excuse Required:** The 16 states at one end of the continuum require voters to meet specific criteria to vote by mail, such as having a disability or being out of the jurisdiction on election day.
- **No Excuse Required but Must Request Ballot for Each Election:** In the second category, there are 16 states that do not mandate an excuse but require voters to request an absentee ballot for each election.
- **No-Excuse Absentee Rolls:** The next category in the continuum consists of 13 states and the District of Columbia. They maintain ongoing rolls of no-excuse absentee voters who automatically receive an absentee ballot for every election. In some cases, these rolls are temporary. In Virginia, for example, voters can request to receive an absentee ballot for every election for the remainder of a calendar year.³³
- **All-Mail Elections:** Finally, there are five states that primarily rely on vote by mail, with all registered voters statewide receiving mail ballots. Some states, such as California, do not fit into this category because they do not have statewide all-mail election policies, but they do allow individual counties to opt into the practice. Figure 4 shows which states fell into each category as of September 2020, based on their vote-by-mail policies as identified by the National Conference of State Legislatures.³⁴

Oregon was the first state to have an all-mail election in 2000. Subsequently, Washington (2012), Colorado (2014), Utah (2019), and Hawaii (2020) followed with the same process. These states distribute ballots by mail for all elections and voters have multiple options for returning their ballot, including through the mail. These states continue to offer in-person voting options, whether through early voting or on election day. As would be expected, these states have a high

proportion of their ballots cast by mail, while states that require an excuse have relatively few absentee voters.

Figure 4: Vote by Mail Policies by State



Advantages of Vote by Mail

Vote by mail has advantages over traditional in-person voting on election day. The advantages for voters include convenience and additional time to review and research the candidates and issues. In addition, when ballots are automatically

All-mail voting has been shown to increase voter participation, particularly among registered voters who vote infrequently.

³² The categories are similar to those described in the following source: Amber F. McReynolds, "Testimony in Support of AB345: Adding a Permanent Absentee Ballot List for Nevada," May 29, 2019, [https://www.leg.state.nv.us/App/NELIS/REL/80th2019/ExhibitDocument/OpenExhibitDocument?exhibitId=44296&fileDownloadName=SenLOE1416%20AB%20435_Support Testimony_Amber McReynolds_Executive Director for National Vote at Home Institute.pdf](https://www.leg.state.nv.us/App/NELIS/REL/80th2019/ExhibitDocument/OpenExhibitDocument?exhibitId=44296&fileDownloadName=SenLOE1416%20AB%20435_Support+Testimony_Amber+McReynolds_Executive+Director+for+National+Vote+at+Home+Institute.pdf), p. 4.

³³ Virginia Department of Elections, "Virginia Vote by Mail Application Form," SBE-701/703.1, July 2020, <https://www.elections.virginia.gov/media/castyourballot/SBE-701-703.1.pdf>, p. 2.

³⁴ National Conference of State Legislatures, *Voting Outside the Polling Place*.

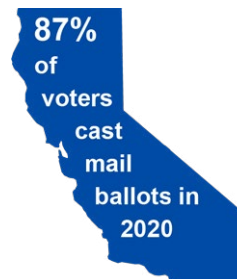
mailed to all voters, it has been shown to increase participation, as was reported in Washington (up 2 to 4 percentage points) and Utah (up 5 to 7 percentage points) when the states switched to sending ballots to all registered voters automatically.³⁵ The increased participation was most pronounced for lower-turnout elections and for registered voters who vote infrequently.³⁶ For states, vote by mail also may be less costly and more efficient. Colorado, for example, saw per-vote expenses decline 40 percent after moving to all-mail voting for the 2014 election.³⁷

A Closer Look at Voting by Mail in Five States

To further illustrate the variation in statewide policies and practices, we examined five states with different approaches to vote by mail. These states were selected to highlight variability in characteristics such as ballot deadlines and voting policies.

California

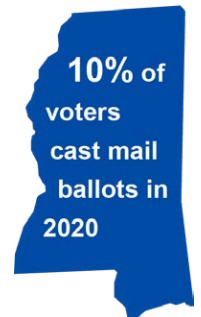
Californians have a long history of voting by mail. Absentee ballots have accounted for more than a fifth of votes cast in every general election going back to 1994.³⁸ In 2002, California began allowing all voters to join a permanent absentee ballot list for all elections. In the 2016 general election, 51 percent of voters in the state reported casting their ballot by mail.³⁹ That same year, California enacted the Voter's Choice Act. The law, which had a phased implementation, allowed counties in the state to opt-in to all-mail elections, where every registered voter



receives a mail ballot 28 days before each election.⁴⁰ By 2020, 15 counties had opted-in, accounting for half of the state's registered voters. As a result of the COVID-19 pandemic, California mailed ballots to all voters statewide in 2020, which resulted in 87 percent of voters casting mail ballots that year. California counts mail ballots that are received up to three days after election day, provided they were postmarked by election day. Additionally, the state supplies prepaid postage for return ballots, provides at least one ballot drop-off location for every 15,000 registered voters, and allows voters to cure ballot envelope signature discrepancies.

Mississippi

To qualify for a mail ballot in Mississippi, voters must meet specific requirements, such as being away from the county where they live on election day; having an illness or disability; or being over age 65.⁴¹ Voters also must have their ballot application and, separately, their return ballot envelope notarized.⁴² Only 4 percent of voters in Mississippi reported casting their ballots by mail in 2016. That increased to 10 percent in 2020 after the state temporarily expanded eligibility for absentee voters who had tested positive for COVID-19 or were quarantining.⁴³ Mississippi does not have a ballot application deadline, so voters can request a mail ballot until election day. As long as ballots are postmarked on or before election day, Mississippi will accept mail ballots that arrive up to five days after election day.



35 Alan S. Gerber, Gregory A. Huber, and Seth J. Hill, "Identifying the Effect of All Mail Elections on Turnout: Staggered Reform in the Evergreen State," *Political Science Research and Methods*, Volume 1, Issue 1, June 2013, <https://www.cambridge.org/core/journals/political-science-research-and-methods/article/abs/identifying-the-effect-of-allmail-elections-on-turnout-staggered-reform-in-the-evergreen-state/3725E51B9B7F331D77DC9B49130D7F7D>, p. 92 and Pantheon Analytics, "Utah 2016: Evidence for the positive turnout effects of 'Vote At home' (also known as Vote by Mail) in participating counties," May 3, 2018, <https://washingtonmonthly.com/wp-content/uploads/2018/06/Utah-2016-Voter-File-Analysis-Pantheon-Analytics.pdf>, p. 1.

36 National Conference of State Legislatures, *Voting Outside the Polling Place*.

37 Pew Charitable Trusts, "Colorado Voting Reforms: Early Results," March 2016, <https://www.pewtrusts.org/-/media/assets/2016/03/coloradovotingreformsearlyresults.pdf>, p. 1.

38 California Secretary of State, "Historical Vote-by-Mail (Absentee) Ballot Use in California," <https://www.sos.ca.gov/elections/historical-absentee>.

39 For the five states discussed in this section, the percentages of voters who cast ballots by mail in 2016 are based on the Census Bureau's Current Population Survey November Supplements, as reported by the Pew Research Center. In the survey, respondents self-reported that they voted by mail. Pew Research Center, "As states move to expand the practice, relatively few Americans have voted by mail."

40 California Secretary of State, "About California's Voter's Choice Act," <https://www.sos.ca.gov/elections/voters-choice-act/about-vca>.

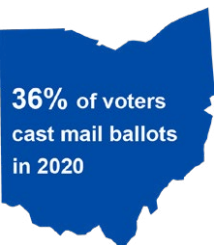
41 Mississippi Secretary of State, "Step-by-Step Absentee Guide," https://www.sos.ms.gov/content/documents/elections/Step-by-Step%20Guide%20to%20Absentee%20Voting_forweb.pdf, p. 4.

42 Voters with disabilities can have their application and ballot envelope signed by a witness who is over 18 and is not a notary.

43 Nathaniel Rakich and Jasmine Mithani, "What Absentee Voting Looked Like in All 50 States," *FiveThirtyEight*, February 9, 2021, <https://fivethirtyeight.com/features/what-absentee-voting-looked-like-in-all-50-states/> and National Conference of State Legislatures, "Absentee and Mail Voting Policies in Effect for the 2020 Election," November 3, 2020, <https://www.ncsl.org/research/elections-and-campaigns/absentee-and-mail-voting-policies-in-effect-for-the-2020-election.aspx>.

Ohio

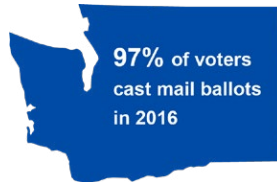
Voters in Ohio can vote by mail without an excuse, though they must request an absentee ballot for every election. Once voters complete their ballot, they must put it in a secrecy sleeve; include identification, such as a copy of a photo ID; sign the secrecy sleeve; insert all materials in the return envelope; and affix postage. In 2016, 22 percent of Ohio's voters reported casting their ballots by mail. The



state proactively mailed ballot applications to all voters in 2020 as a result of the COVID-19 pandemic, and 36 percent of voters cast their ballots by mail that year.⁴⁴ Ballots must be postmarked by, at latest, the day before election day and received no later than 10 days after election day. Additionally, the state notifies voters if their ballot was rejected and allows them to resolve the issue.

Washington

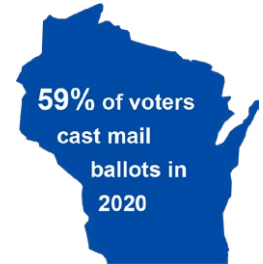
In 1991, Washington began allowing any voter to join a permanent absentee voting list.⁴⁵ The state further expanded mail voting in 2012, when it began mailing ballots to all voters for every election. The ballots go out 18 days before each election, and Washington accepts ballots that arrive after election day, so long as they are postmarked by election day. In addition, Washington pays for the postage on all return ballots and it provides at least one ballot drop box per 15,000 registered voters in each county. The state also notifies voters whose ballots were rejected due to mismatched signatures and allows them to cure the issue.⁴⁶



Wisconsin

Wisconsin has one of the most uniquely decentralized systems of election administration in the nation, with more than 1,850 city, town, or village-level election jurisdictions.⁴⁷

The state accounts for nearly one-fifth of the total count of election jurisdictions in the U.S. Any registered voter in Wisconsin can cast an absentee ballot.⁴⁸ While the state has one of the highest overall voter turnout rates in the nation, only 9 percent of voters reported casting their ballots by mail in 2016.⁴⁹ Due to the COVID-19 pandemic, the state instituted the temporary policy of proactively mailing absentee ballot applications to all registered voters in 2020. As a result, the portion of votes cast by mail increased to 59 percent that year.⁵⁰ In normal years, voters must request an absentee ballot application. For both the 2020 election and others preceding it, voters must submit their ballot applications at least five days before each election and include a copy of their photo ID with their application. Additionally, ballots must be filled out in the presence of a witness who signs the postage pre-paid ballot envelope. All completed ballots must be received by 8 pm on election day, regardless of when they were mailed.



Key Challenges for the Postal Service and Potential Solutions

We have identified several challenges that impact the Postal Service's ability to process and deliver election mail effectively. The decentralized nature of elections in the U.S. is at the heart of these challenges. Each state, as well as thousands of local election jurisdictions, follow independent processes and policies that do not always align with the Postal Service's standard operations. In addition, there are wide disparities in the size of local election jurisdictions and the resources they

44 National Conference of State Legislatures, "Absentee and Mail Voting Policies in Effect for the 2020 Election" and Ohio Secretary of State, "2020 Official Elections Results," <https://www.sos.state.oh.us/elections/election-results-and-data/2020/>.

45 Washington Secretary of State, "A Tradition of Independence: A Timeline of Voting and Elections in Washington State," <https://www.sos.wa.gov/elections/timeline/time5.htm>.

46 Note: the percentage of votes cast by mail in the 2020 election in Washington was not available at the time of publication.

47 MIT Election Data + Science Lab, "Wisconsin's Election Landscape," <https://electionlab.mit.edu/landscapes/wisconsin> and National Conference of State Legislators, "Wisconsin Elections: Decentralized Down to the Village Level," National Conference of State Legislatures Blog, <https://www.ncsl.org/blog/2014/06/24/wisconsin-elections-decentralized-down-to-the-village-level.aspx>.

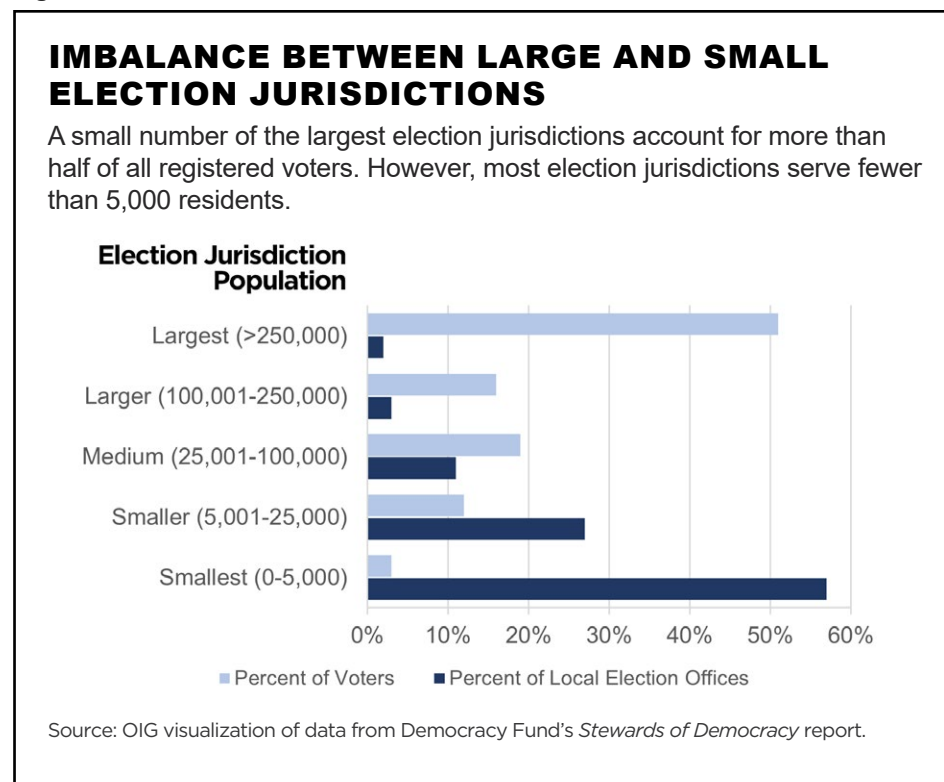
48 Wis. Stat. § 6.20.

49 MIT Election Data + Science Lab, "Wisconsin's Election Landscape."

50 Wisconsin Elections Commission, "Absentee Ballot Report – November 3, 2020 General Election," November 6, 2020, <https://elections.wi.gov/node/7236> and Wisconsin Elections Commission, "2020 General Election Voting and Registration Statistics Report," November 3, 2020, <https://elections.wi.gov/index.php/node/7299>.

have available to support vote by mail activities. For example, three quarters of large counties with more than 250,000 residents report having staff who spend all or nearly all of their time on elections. However, most election jurisdictions are small, serving fewer than 5,000 residents each, as shown in Figure 5. In these small jurisdictions, nearly eight in 10 local elections officials report spending less-than-half of their workhours on election-related duties, with their workload focused on other government areas, such as maintaining official records or court filings.⁵¹

Figure 5: Size of Election Jurisdictions



Design, Printing, and Mailing of Ballots

To prioritize ballots in the mailstream, the Postal Service must be able to identify them. However, a portion of the ballots are mailed without the Postal Service's unique IMb and without a ballot-specific identifier. The ballot-specific IMb allows USPS to identify the mailpieces as ballots and track them.⁵² Likewise, the physical features of ballot envelopes also play an important role in helping postal workers identify them within processing facilities and delivery units. For example, best practices call for a prominent stripe of color on the edge of the envelope, with different colors used to mark different types of ballots.⁵³ With thousands of local election offices independently designing different ballots and envelopes, Postal Service management indicated that poorly designed ballots are a key challenge.

Additionally, the size and thickness of ballot envelopes, as well as the location of text on envelopes, affect the efficiency with which postal equipment can process ballots. This can impact delivery times. In particular, return ballot envelopes often

Postal processing equipment can inadvertently route poorly-designed return ballot envelopes back to the voter instead of to election officials.

have a significant amount of text and the voter's name and address on the back of the envelope, as shown in Figure 3. If the text and markings are not laid out carefully, the Postal Service's automated equipment may confuse the back and front of the envelope, reading the voter's information as the delivery address.

These errors can cause completed ballots to be inadvertently routed back to voters instead of to election officials.⁵⁴

51 Democracy Fund, *Stewards of Democracy: The Views of American Local Election Officials*, June 2019, https://democracyfund.org/wp-content/uploads/2020/06/2019_DemocracyFund_StewardsOfDemocracy.pdf, pp. 9, 11, 26.

52 U.S. Postal Service Office of Inspector General, *Processing Readiness of Election and Political Mail During the 2020 Election*, Report 20-225-R20, August 31, 2020, <https://www.uspsig.gov/sites/default/files/document-library-files/2020/20-225-R20.pdf>, pp. 2.

53 Center for Civic Design, "Designing vote at home envelopes and materials."

54 The OIG found address placement issues were causing some ballots in Wisconsin to be routed to the wrong address. U.S. Postal Service Office of Inspector General, *Processing Readiness of Election and Political Mail During the 2020 Election*, pp. 2, 8.

The class of mail that election officials select also may impact service. As mentioned previously, the Postal Service does not have a dedicated election mail product. In its written guidance, the Postal Service encourages election officials to use First-Class Mail, but more than seven out of 10 ballots mailed to voters in the November 2020 election were sent as Marketing Mail, according to data provided by the Postal Service.⁵⁵ The mail class can have a significant impact on the turnaround times for ballots, particularly for ballots that are mailed from a location far away from the state where the ballots will be counted.⁵⁶ A reason for the difference in delivery times is that Marketing Mail typically travels by ground, while First-Class Mail standards permit that mail to be flown.⁵⁷ As mentioned earlier, about 15 percent of outgoing ballots were sent from a different state than they were destined; out of the outgoing ballots that did not meet their service standards, about 28 percent travelled across state lines.

In addition, the printing and mailing of ballots involves complex processes, specialized equipment, and secure handling. Some states have formal standards that ballot printers must meet, while other states do not. The lack of standards creates a potential risk that election officials could select a vendor that is not fully equipped to handle the complexities of ballot printing and mailing.

Postal Service Efforts to Mitigate Ballot Envelope Design and Mailing Challenges

To promote best practices in ballot envelope design, the Postal Service has taken various actions, including: posting online materials aimed at election officials, introducing the “Official Election Mail” logo (shown in Figure 6) for use on the outside of ballot envelopes, and offering Mailpiece Design Analysts to help election officials design ballot envelopes.⁵⁸ The Postal Service also developed an “Election Mail Kit,” which includes relevant information and links to additional

vote-by-mail resources. The kits were sent to 11,500 election officials in February and March of 2020.⁵⁹

Figure 6: Official Election Mail Logo



To help alleviate these challenges long-term, election experts have proposed a variety of reforms that would require election officials or state legislatures to act. These include:

- **Utilize Unique IMbs and the Ballot Mail STID:** Election administrators could standardize their use of the unique IMb and the ballot mail STID, which would give them the ability to track all ballots and ensure that they were received.⁶⁰
- **Implement Best Practices in Ballot Design:** States could work with ballot design experts to create standard ballot and envelope templates that could be utilized by local election jurisdictions statewide, as California did.⁶¹ Consolidating some design decisions at the state level could better ensure

⁵⁵ This figure only includes ballots that the Postal Service was able to identify in the mailstream. The total amount may have been higher.

⁵⁶ Postal management said it does not track the portion of ballots that are mailed from a non-local location. Note that for ballots mailed locally, there is generally little difference in delivery time between those sent as First-Class Mail versus Marketing Mail.

⁵⁷ The Postal Service announced in March 2021 that it planned to reduce the portion of First-Class Mail that is transported by air. U.S. Postal Service, *Delivering for America*, p. 30.

⁵⁸ The Postal Service’s graphics guidelines and logos can be seen here: <https://about.usps.com/election-mail/pub631.pdf>.

⁵⁹ The 2020 Election Mail Kit can be found here: <https://about.usps.com/kits/kit600.pdf>.

⁶⁰ National Vote at Home Institute, “Vote at Home Policy Actions: COVID 19 Response,” May 2020, <https://voteathome.org/wp-content/uploads/2020/07/NVAHI-50-State-Policy-Analysis.pdf>, p. 3.

⁶¹ *Ibid.*

that ballots are fully compatible with the Postal Service’s processing equipment.

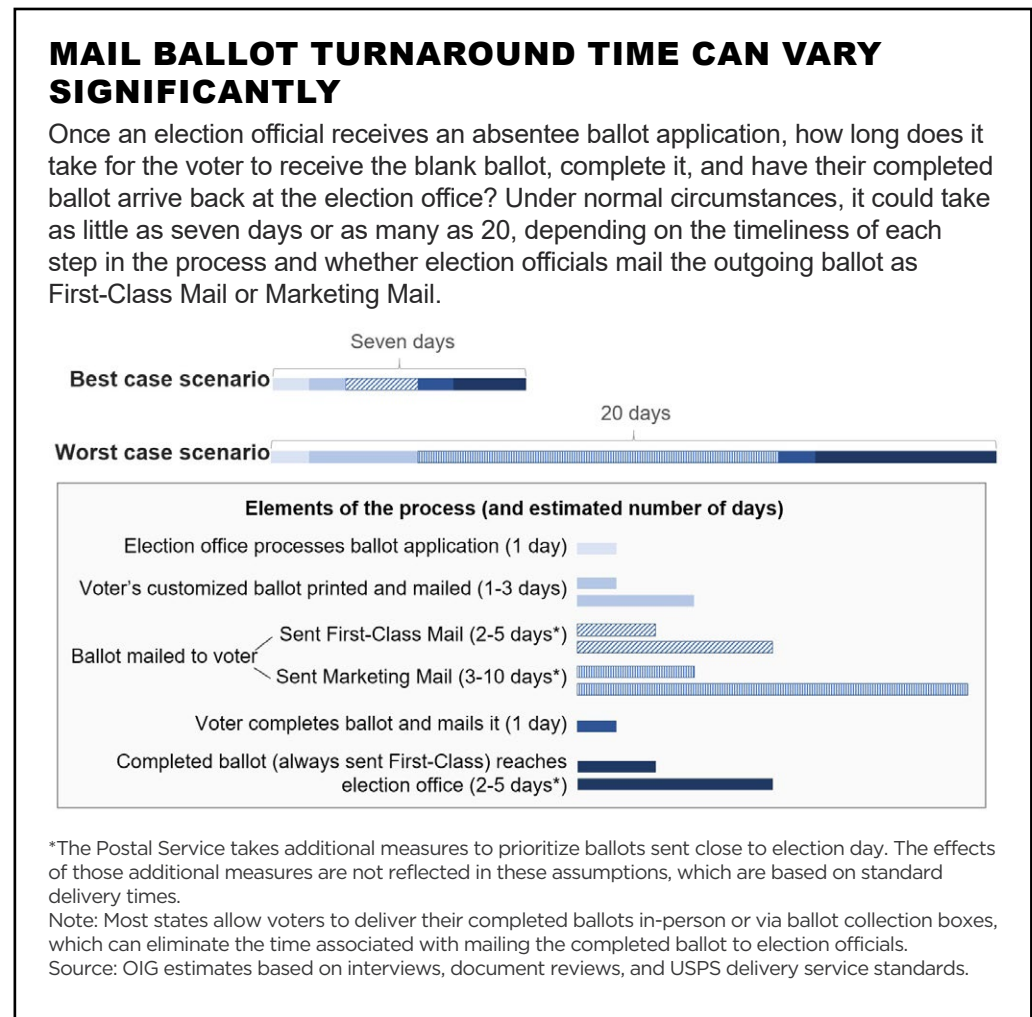
- **Standards for Ballot Printers:** Private vendors, including ballot printers, play a critical role in key aspects of elections. These election vendors, however, face minimal supervision in some states and at the federal level.⁶² As vote by mail increases, additional standards for ballot printers could help ensure that they are equipped to handle the sophisticated issues surrounding ballot printing.

Ballot Deadlines

When accounting for the steps in the vote-by-mail process, we estimate that it may take seven to 20 days between the time election officials receive an absentee ballot application and when they receive the completed ballot back from the voter, as shown in Figure 7. The timeframes assume the Postal Service meets its standard delivery windows, that voters complete their ballot in one day, and that the entire process happens through the mail.

The Postal Service recommends that voters request ballots at least 15 days before election day and mail their completed ballots before the election and at least seven days before the deadline.⁶³ However, 26 states allow voters to request absentee ballots within seven days of the deadline when the completed ballots must be received by election officials, as shown in Figure 8. The deadlines leave little time for the blank ballots to reach voters and for the completed ballots to get back to election officials in time. If ballots arrive after the deadline, they will not be counted. In 2018, more than 114,000 absentee ballots were rejected because they arrived too late.⁶⁴

Figure 7: Estimated Timeframes for Absentee Ballots

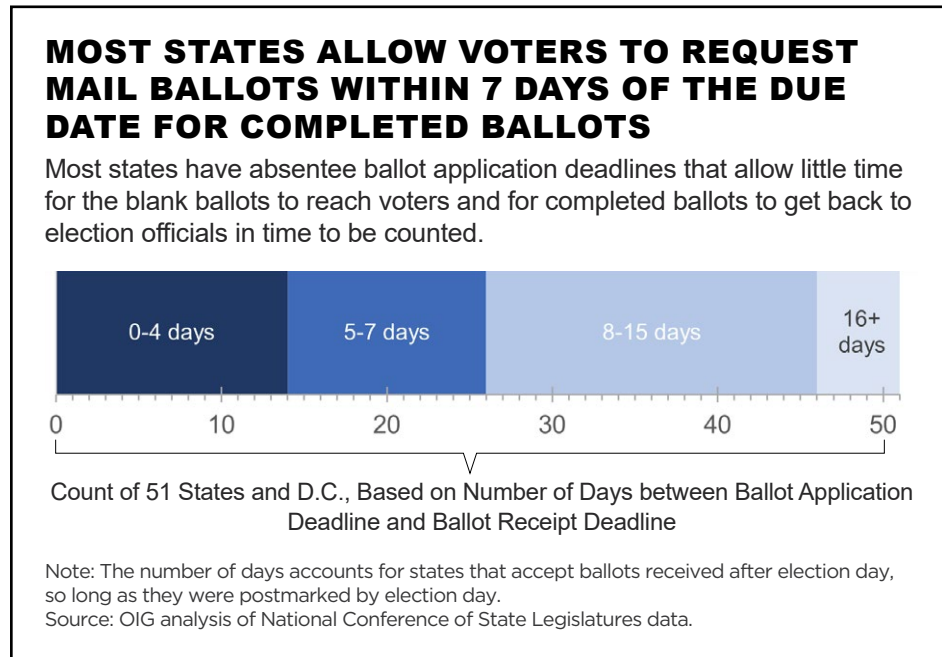


62 Lawrence Norden and Gowri Ramachandran, “A Framework for Election Vendor Oversight,” Brennan Center for Justice, November 12, 2019, <https://www.brennancenter.org/our-work/policy-solutions/framework-election-vendor-oversight>.

63 U.S. Postal Service Office of Inspector General, *Service Performance of Election and Political Mail During the November 2020 General Election*, Report No. 20-318-R21, March 5, 2021, <https://www.uspsig.gov/sites/default/files/document-library-files/2021/20-318-R21.pdf>, p. 11.

64 U.S. Election Assistance Commission, *Election Administration and Voting Survey: 2018*, p. 14.

Figure 8: Ballot Application Deadlines



Postal Service Efforts to Mitigate Ballot Deadline Challenges

The Postal Service has taken a variety of measures aimed at educating voters and elections officials about the importance of requesting and returning ballots earlier than the deadlines written into state statutes. Those efforts have included online resources, direct outreach to state elections officials, postcards delivered to every home in America, and a message to subscribers of the Postal Service’s Informed Delivery emails that urged them to plan ahead and linked to online vote-by-mail information.⁶⁵ However, if a voter requests a ballot within a week of the election, and their state’s statute allows them to do so, election officials must send the ballot — even though the ballot, if mailed, is at risk of being returned too late to be counted.

⁶⁵ Informed Delivery is a service that gives registrants a daily preview of their incoming mail. For more details, see <https://informedelivery.usps.com/>.

⁶⁶ U.S. Postal Service, *2020 Post-Election Analysis*, pp. 16-17.

⁶⁷ For more details on the “extraordinary measures,” see: <https://www.uspsog.gov/sites/default/files/document-library-files/2021/20-318-R21.pdf>.

To accommodate the tight deadlines for absentee ballots, the Postal Service has implemented policies to deploy additional resources and to take what it calls “extraordinary measures” to deliver all ballots by election day.⁶⁶ For the November 2020 election, these supplemental actions, roughly in order of implementation, included:

- Prioritization of ballots in processing operations, regardless of the mail class used to send them;
- Daily sweeps for ballots in facilities to certify that all ballots scheduled to depart the facility have done so;
- Additional transportation and special trips for ballots;
- Bypassing the processing network, with local inbound ballots going directly from the post office that received them to the election office;
- Processing mail on the Sunday before election day; and
- Treating ballots as though they are Priority Mail Express — a premium service that guarantees nationwide delivery in one or two days.

The Postal Service began implementing some of these measures as states began mailing ballots and took additional actions as election day approached.⁶⁷ Some of these measures were in place only for the week immediately preceding the election, and postal management said the Postal Service had similar measures in place during previous elections.

The supplemental operational efforts helped the Postal Service to deliver ballots during the November 2020 general election to voters in an average of 2.1 days and to deliver ballots from voters to elections officials in an average of 1.6 days, which was significantly less than the maximum time allowed under the Postal Service’s

USPS delivered ballots to voters in an average of 2.1 days and from voters to election officials in an average of 1.6 days during the November 2020 election.

standard delivery windows.⁶⁸ While the additional resources and extraordinary measures were in place, transportation trips increased about 35 percent compared to the previous month. Overtime associated with mail processing, delivery, and customer service increased by about 30 percent.⁶⁹ If ballots were returned in timeframes better aligned to the Postal Service's standard delivery times, it could have alleviated some of the need for the "extraordinary measures" the Postal Service undertook in the week before election day.

As a more permanent solution to these challenges, elections experts have recommended policy changes at the state level, including:

- **Revise State Laws Regarding Deadlines for Requesting and Receiving Mail Ballots:** State legislatures could reevaluate their state's statutory deadlines for ballot requests and returns to better align them with the Postal Service's standard delivery windows, which have become longer over time. That said, election experts acknowledge that a 10-to-15-day deadline for absentee ballot requests will be "unworkable" in some states.⁷⁰ In those cases, election administrators could caution voters on the risk of returning ballots via mail after a certain date and advise voters of alternative ballot return options.
- **Expand Options for Secure In-Person Drop Off of Mail Ballots:** When voters mark their ballots close to election day, there may be insufficient time for their ballot to reach the election officials by mail. Election officials can mitigate this by offering voters alternative ballot return options, such as secure drop boxes in government facilities or highly trafficked public areas.⁷¹ At least 8 states have laws that specifically authorize ballot drop boxes.

Postmarking Requirements for Ballots

Some states specifically require that return ballots bear a postmark as an indication that they were mailed prior to the statutory deadline. However, the

Postal Service uses postmarks as a means to cancel stamps so that they cannot be reused. Many ballots are among the types of mailpieces that would not ordinarily receive a postmark under postal processes. The lack of a postmark creates a problem if the state requires the ballot to bear a postmark to be counted.

The Postal Service Adapts its Postmarking Practices During Elections

To overcome this challenge, the Postal Service has altered its processing practices during elections so that all return ballots get a postmark. For the November 2020 election, this included manually postmarking many ballots at delivery units and creating ballot postmark-only lines at post office retail counters. In addition, some post offices created drive-through options where voters could drop off their ballot and get it postmarked.⁷²

As another solution, states with postmark requirements could utilize the IMb record, rather than a postmark, as proof of timely deposit of the return ballot into the mail. For example, the Virginia State Board of Elections has adopted regulations requiring the use of IMb tracking information on all absentee ballot envelopes and directing election officials to rely on the IMb data in the event of a missing or illegible postmark.⁷³ Likewise, Washington statute specifically authorizes that if a postmark is missing or illegible, election officials may use other methods to verify the date the ballot was mailed, including the date of the voter's signature on the ballot envelope or "available U.S. Postal Service tools to verify the date of mailing."⁷⁴ A broader adoption of these types of state policies could reduce the need for the Postal Service to alter its postmarking practices during elections.

68 These figures only represent the ballots with an IMb that USPS could identify as ballots. U.S. Postal Service, *2020 Post-Election Analysis*, p. 2.

69 U.S. Postal Service Office of Inspector General, *Service Performance of Election and Political Mail During the November 2020 General Election*, p. 2.

70 The Bipartisan Policy Center, "The New Realities of Voting by Mail in 2016," June 2016, <https://bipartisanpolicy.org/wp-content/uploads/2019/03/BPC-Voting-By-Mail.pdf>, pp. 10-11.

71 The Bipartisan Policy Center, "Logical Election Policy: Report and Recommendations of BPC's Task Force on Elections," January 2020, https://bipartisanpolicy.org/wp-content/uploads/2020/01/Bipartisan_Elections-Task-Force_R01-2.pdf, p. 28.

72 U.S. Postal Service Office of Inspector General, *Service Performance of Election and Political Mail During the November 2020 General Election*, p. 9.

73 1 Va. Admin. Code § 20-70-20 (F) and 1 Va. Admin. Code § 20-70-70 (B).

74 Wa. Admin. Code § 434-250-120 (1)(d)(i).

Prior OIG Recommendations to Improve Vote by Mail

The OIG has previously recommended actions for the Postal Service to take that could improve the vote-by-mail process, including:

- Leveraging its partnerships with state and local election officials to work toward creating a separate, simplified mail product exclusively for election mail that would support uniform mail processing, including mandatory mailpiece tracking, and proper mailpiece design.⁷⁵ The Postal Service is reviewing possible implementation of this recommendation.
- Continuing to educate state and local election officials on mailing deadlines for requesting and receipt of ballots that account for the Postal Service's time to process, transport, and deliver mail.⁷⁶ The Postal Service indicated these practices would continue and an update on its efforts is due by December 31, 2021.

The OIG's previous work on election mail is further described in [Appendix A](#).

Conclusion

The vote-by-mail process is decentralized and widely varied, with a patchwork of laws and procedures from state to state. In some cases, these laws and procedures have not kept up with the growing use of mail ballots, which creates challenges for voters, election officials, and the Postal Service. A number of changes could make the vote-by-mail process run more smoothly and ensure that every ballot is delivered within the deadlines established by states.

⁷⁵ U.S. Postal Service Office of Inspector General, *Processing Readiness of Election and Political Mail During the 2020 General Elections*, p. 4.

⁷⁶ U.S. Postal Service Office of Inspector General, *Service Performance of Election and Political Mail During the November 2020 General Election*, March 5, 2021, p. 5.

Appendices

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Appendix A: Additional Information

Objective, Scope, and Methodology

The objective of the research was to provide an overview of vote-by-mail processes, the variability of those processes, and challenges for the Postal Service and others.

We focused on the processes surrounding domestic ballot mail for general elections for federal office, which occur in November on even-numbered years in the United States. Other types of election mail (for example, voter registration materials) and other types of elections (for example, primary, runoff, and special elections) may follow different processes and were outside of our scope. We also did not focus on temporary changes that states and election officials implemented in 2020 due to the unique circumstances presented by the COVID-19 pandemic.

To meet our objective, we used the following methods:

- **Analyzing policies, studies, and relevant documents:** We reviewed documentary evidence about the vote-by-mail process from the Postal Service and external stakeholders. We analyzed policies; state laws and regulations; and educational materials and resources used by election officials. We

reviewed existing reports and studies from other federal agencies, as well as external groups and experts that study and monitor elections and election policy.

We also reviewed state laws, educational materials, and reports to examine the vote by mail process in five states judgmentally selected for variation in characteristics, such as voting policies and ballot deadlines.

- **Interviewing Postal Service management and external stakeholders:** We interviewed the director of the Postal Service's election mail operations; an elections expert who is a former member of the Presidential Commission on Election Administration; and the vice president of postal affairs and business development at a large ballot printer.

We conducted work for this white paper in accordance with the Council of the Inspectors General on Integrity and Efficiency, Quality Standards for Inspection and Evaluation. We discussed our observations and conclusions with management on May 11, 2021, and included their comments where appropriate.

Prior Coverage

Report Title	Objective and Findings	Report Number	Final Report Date	Monetary Impact
<p><i>Service Performance of Election and Political Mail During the November 2020 General Election</i></p>	<p>The OIG found that the Postal Service prioritized processing of identifiable ballots during the 2020 general election. The Postal Service improved timeliness over the 2018 mid-term election even with increased volumes of Election Mail. This was accomplished by leveraging high-cost efforts such as extra transportation and overtime to improve delivery performance. The OIG found that 93.8 percent of election mail and 91.9 percent of political mail was processed within the service standard. The OIG identified some operational compliance issues and the Postal Service took immediate corrective action. The OIG also found opportunities for the Postal Service to improve its internal communication, including continuing to educate state and local election officials on mailing deadlines.</p>	<p>20-318-R21</p>	<p>March 5, 2021</p>	<p>None</p>
<p><i>Military, Diplomatic, and Other International Election Mail</i></p>	<p>The OIG found that the Postal Service's preparedness for processing international mail for the 2020 election was at risk because of processing delays at the Chicago International Service Center. These delays stemmed from staffing shortages, outbound mail restrictions, presentation and screening delays, and transportation-related delays resulting from the COVID-19 pandemic. In addition, the Postal Service did not have an active system for tracking and reporting on eligible military, diplomatic, and other international election ballots until operational and system modifications were made in September 2020.</p>	<p>20-271-R20</p>	<p>September 30, 2020</p>	<p>None</p>

Report Title	Objective and Findings	Report Number	Final Report Date	Monetary Impact
<i>Processing Readiness of Election and Political Mail During the 2020 General Elections</i>	The OIG found that the Postal Service faces challenges in ensuring full compliance with standards related to ballot tracking, mailpiece processing, postmarking, and delivery timelines. To minimize these complications, the OIG identified a series of best practices and recommendations. This includes leveraging partnerships with state and local election officials to work toward creating a simplified mail product exclusively for election mail that would support uniform mail processing, mailpiece tracking, and proper mailpiece design.	20-225-R20	August 31, 2020	None
<i>Timeliness of Ballot Mail in the Milwaukee P&DC Service Area</i>	The OIG found that the Postal Service generally followed its procedures for processing and delivering ballots for the Wisconsin primary of April 7, 2020. The OIG also found issues specific to the Milwaukee area related to timeliness of ballots being mailed to voters, correcting ballots delivered to the wrong address, an inability to track ballots, and inconsistent postmarking of ballots. There were opportunities identified to improve communication and coordination between the Postal Service and election officials.	20-235-R20	July 7, 2020	None
<i>Service Performance of Election and Political Mail During the 2018 Midterm and Special Election</i>	The OIG found that the Postal Service's nationwide service performance score for election and political mail was slightly below its goal of 96 percent. Districts that performed well adopted best practices including timely, frequent communication with all levels of plant staff as well as having personnel separate and identify election and political mail from other mail in the facility to improve processing.	19XG010NO000-R20	November 4, 2019	None
<i>Election Mail Opportunities</i>	The OIG recommended that the Postal Service develop a marketing and sales strategy to increase voting by mail that could increase the Postal Service's revenue by around two million dollars per year and would increase momentum for election jurisdictions to transition to all-mail voting.	MS-AR-15-007	August 4, 2015	None

Appendix B: Management's Comments

THOMAS J. MARSHALL
GENERAL COUNSEL
AND EXECUTIVE VICE PRESIDENT



May 27, 2021

JOSEPH WOLSKI
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Vote by Mail and the Postal Service: A Primer (Project Number 2021RISC004)

Thank you for the opportunity to review and comment on the Office of Inspector General's (OIG's) white paper, *Vote by Mail and the Postal Service: A Primer*. We appreciate the OIG's attention to this important matter and your recognition that several of the key challenges that impact the Postal Service's ability to effectively process and deliver election mail are outside of our control. We understand and appreciate our important role in the electoral process, and we take great pride in delivering for the American public. For the 2020 General Election season, we delivered 99.89 percent of ballots within seven days, consistent with the guidance we provided to voters throughout the election cycle, and we delivered 97.9 percent of completed ballots within three days. Overall, on average, we delivered ballots from election officials to voters in 2.1 days and delivered ballots from voters to election officials in just 1.6 days. Our success was due to the extensive operational and organizational preparation leading up to the general election; our commitment to using extraordinary measures that deviate from our normal processes and procedures to expedite the processing and delivery of ballots as we have done in prior election cycles; our strong relationships with election officials; and, most importantly, the tremendous dedication and focus of the men and women of the United States Postal Service, who take very seriously the trust that is placed in them by election officials and voters alike.

While the Postal Service fulfilled its duty to the American public and successfully delivered the nation's election mail during the 2020 election season, we appreciate the white paper's acknowledgment that there are ongoing challenges that could impact the timely delivery of election mail if changes are not made. The white paper focused on three key challenges—ballot envelope design, ballot deadlines, and postmarking—and proposed several sensible solutions that election officials and states could implement that would eliminate or minimize the need for the Postal Service to engage in special measures to ensure timely delivery. Management agrees with the key challenges identified within the white paper and largely supports the proposed potential solutions, although their implementation is almost entirely outside of the Postal Service's purview.

The white paper appropriately recognized that quality ballot envelope design is critical to facilitate the proper handling and delivery of ballots. To that end, the white paper identified several Postal Service best practices, including use of the Official Election Mail logo on

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envelopes and utilization of the Postal Service's Mailpiece Design Analysts (MDAs) to review mailpieces prior to production, as key steps to achieving quality mailpiece design. The white paper further recommended that election officials use a unique Intelligent Mail Barcode with a ballot identifier to facilitate tracking and that states create envelope templates that are fully compatible with Postal Service processing equipment. We strongly support these recommendations, which echo the recommendations we have made to election officials for years. Although not directly addressed in the white paper, it is equally important that election officials follow the Postal Service's envelope design recommendations and avoid using envelopes with design flaws. We understand that election officials are not required to adopt the Postal Service's envelope design recommendations, and that some election jurisdictions will seek MDA review but do not adopt their recommendations. This leaves poor quality envelopes in circulation and could negatively impact voters. Additionally, many election jurisdictions print large stockpiles of envelopes that are used for multiple election cycles—including, in some instances, even after design flaws impacting processing and delivery are identified. While we cannot stop these practices, we note that timely seeking and following MDA guidance will significantly improve mail processing and delivery and thus will enhance the efficacy of mail-in voting.

The white paper also found that election deadlines in roughly half the states leave little time for blank ballots to reach voters and for completed ballots to get back to election officials by mail, when evaluated against the Postal Service's established delivery standards. We strongly agree that unrealistic state deadlines can place ballots at a significant risk of not being received or returned in time to be counted, and in fact we attempted to draw attention to this issue through a general letter I sent to each election official in May 2020 and through individual letters I sent to each state's top election official in July 2020. Indeed, the problem is significantly more pervasive than identified within the white paper. The white paper's analysis of state election deadlines did not fully account for the time that is allowed (and that it takes) for election officials to process ballot applications before mailing a ballot to voter. These processing times are often set by statute, and, in some cases, give election officials several days and even up to a week before they are required to mail a blank ballot to the voter. Particularly where ballot applications are submitted close to the state's application deadline, these processing times by election officials place further strain on already tight timeframes and may make seemingly workable deadlines problematic.

We appreciate that the OIG recognized the Postal Service's mitigation efforts to try to ensure that voters can successfully use the mail to participate in an election if they choose to do so, despite state election deadline problems. The white paper explained that the Postal Service has undertaken significant efforts to educate the public and election officials about how to successfully use the mail, including timing recommendations, and that we have deployed extraordinary measures to mitigate the issues caused by problematic ballot deadlines when election officials and/or voters send ballots close to Election Day. Nevertheless, we caution that, while our extraordinary measures are designed to rescue as many "at risk" ballots as possible, relying too heavily on such measures is not a sustainable strategy; such measures deviate from our normal processing operations and thus introduce unnecessary risk and place a significant strain on postal resources. We strongly agree with the OIG's recommendation that a more permanent solution to these timing problems is needed, requiring policy and legislative change at the state level.

Finally, with regard to postmarking, the OIG importantly noted that the primary purpose of a postmark is to cancel postage and that many ballots are among the types of mailpieces that would not ordinarily receive a postmark under normal postal processes. Although the Postal

Service has developed special processes to help ensure that identifiable return ballots receive a postmark, such processes deviate from our normal procedures and therefore some return ballots may not receive a legible postmark despite our best efforts. This is important for our customers to understand, particularly for policymakers who may wish to find secondary means of identifying whether a ballot was mailed by a particular state deadline in the event that a legible postmark is missing.

We would again like to thank the OIG for its work on this important topic. While we remain committed to successfully delivering the nation's election mail, we strongly agree with the white paper's observation that there are challenges that must be resolved by external stakeholders, like election officials and the states, to ensure that the mail can continue to be successfully used as part of the electoral process if election officials or voters determine to utilize us for that purpose.

A handwritten signature in blue ink that reads "Thomas J. Marshall". The signature is written in a cursive style with a large initial "T".

Thomas J. Marshall

cc: Manager, Corporate Audit & Response Management



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