



LEAGUE OF WOMEN VOTERS® OF FLORIDA

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Pamela Goodman

September 20, 2017

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Mr. Ken Detzner,
Secretary of State
Florida Department of State
R.A. Gray Building
500 South Bronough Street
Tallahassee, Florida 32399-0250

TREASURER

Theresa Francis-Thomas

Dear Secretary Detzner,

SECRETARY

Patricia Drago

RE: October 1, 2017, Implementation of Online Voter Registration

We write to identify two critical areas of concerns that impact the efficiency, value, and functionality of online voter registration (OVR). Specifically, the request for additional information that the OVR legislation does not require; the plan to promote and educate Floridians on OVR; and the impact of OVR on third party voter registration organizations. Time is of the essence as your office has assured us that online voter registration will be fully operational to the public on October 1, 2017.

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1. Online Registration Data Requirements

The online voter registration form requires a driver's license number, the date of issuance and social security number last four digits. The current paper form, DS-DE-39, only requires the social security last four digits if the registrant does not have a Florida driver's license or identification card. The Florida legislation SB 228 states that a legal distinction may not be made between online voter registration and other methods.

- The data required for the online voter registration form should not differ from the required data on the written voter registration form.

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2. Third-Party Voter Registration Organizations

The online voter registration form does not provide a place to enter data for third party voter registration organizations. Florida Statute 97.0575 requires the division or the supervisor of elections to make voter registration forms available to third-party voter registration organizations. All forms must contain information identifying the organization to which the forms are provided. This omission puts all third-party voter registration organizations in noncompliance with the law.

- The online voter registration form should include a place to identify third-party voter registration organizations.

3. Online Voter Registration Public Engagement and Education

Online voter registration will launch in less than 30 days. We are not aware of any public outreach and education on the OVR process. It is crucial that the public be well informed on the availability of OVR. There are several November 2017 municipal elections around the state. They provide an excellent opportunity to gain immediate feedback on the voter experience. The League pledges our support to help you engage and inform the public on this important initiative.

- The State should immediately provide marketing, promotions, engagement, and outreach on online voter registration.

Your immediate resolution of our concerns will ensure all Floridians the equal right and opportunity to register to vote online when the system launches on October 1st. The League would like to meet with you and other state officials, at your earliest convenience, to assist in any way possible to address the points outlined in this letter.

We will follow up with your office next week to confirm the steps. We thank you in advance for your diligence to ensure that Florida complies with its obligations under state and federal law. The Florida League is a nonpartisan political organization which encourages the informed and active participation of citizens in government and influences public policy through education and advocacy. As it has for almost 100 years, the League of Women Voters stands ready to vigorously protect the rights of Florida voters.

Respectfully,



Pamela S. Goodman, President
League of Women Voters of Florida

cc: Florida Governor Rick Scott
Florida Legislature
Florida Supervisor of Elections

Senate Bill 228

http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&Search_String=&URL=000-0099/0097/Sections/0097.052.html

Submit information necessary to establish an applicant's eligibility to vote, pursuant to s. 97.041, which includes the information required for the uniform statewide voter registration application pursuant to s. 97.052(2).

Florida Statute 97.0575(8)

The division or the supervisor of elections shall make voter registration forms available to third-party voter registration organizations. All such forms must contain information identifying the organization to which the forms are provided. The division shall maintain a database of all third-party voter registration organizations and the voter registration forms assigned to the third-party voter registration organization. Each supervisor of elections shall provide to the division information on voter registration forms assigned to and received from third-party voter registration organizations. The information must be provided in a format and at times as required by the division by rule. The division must update information on third-party voter registrations daily and make the information publicly available.

Senate Bill 228 <https://www.flsenate.gov/Session/Bill/2015/228>

8) A legal distinction may not be made between online voter registration under this section and voter registration in person, by mail, or by other methods provided by general law.