

March 22, 2022

House Ethics & Elections Committee  
Illinois General Assembly  
401 S 2nd Street  
Springfield, IL 62701  
*Via email*

RE: Verified Voting Comments on Senate Bill 829

Dear Committee Members:

On behalf of Verified Voting, I submit these comments on Senate Bill 829. Verified Voting is a nonpartisan nonprofit organization whose mission is to strengthen democracy for all voters by promoting the responsible use of technology in elections. We believe that the integrity and strength of our democracy rely on citizens' trust that each vote is counted as cast.

While we support the overall aim of SB 829 – to provide improved access to the ballot for voters with a print disability – we recommend that the bill be amended to ensure the secure implementation of Remote Accessible Vote by Mail (RAVBM) in Illinois. When carefully implemented, RAVBM provides a secure system for voters otherwise unable to access a traditional mail ballot.<sup>1</sup> However, it is crucial that RAVBM systems employ certain safeguards, which the Illinois State Board of Elections should be required to consider when certifying systems. For instance, [California's Election Code Sec. 19295](#) outlines the principles for a secure RAVBM system, and we recommend that SB 829 incorporate similar language. For a system to be secure it must be prohibited from allowing any of the following capabilities, even optionally:

- Usage of a remote server to mark a voter's selections transmitted to the server from the voter's computer via the internet;
- Storage of any voter identifiable selections on a remote server;
- Tabulation of votes.

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<sup>1</sup> Common Cause and Verified Voting, 2020. Election Security and an Accessible Vote By Mail Option. <https://verifiedvoting.org/publication/election-security-and-an-accessible-vote-by-mail-option/>

SB 829 wisely requires voters using RAVBM to print their voted ballots before returning them. Electronic ballot return should be prohibited from being part of any RAVBM system. Multiple cybersecurity experts have concluded that internet voting is insecure. The National Academies of Sciences, Engineering and Medicine released a report in 2018 stating that the technology to return marked ballots securely and anonymously over the internet does not exist.<sup>2</sup> Additionally, in the lead up to the 2020 General Election, the Department of Homeland Security, the Election Assistance Commission, the Federal Bureau of Investigation, and the National Institute of Standards and Technology told states and election officials that electronic ballot return “creates significant security risks to the confidentiality of ballot and voter data (e.g., voter privacy and ballot secrecy), integrity of the voted ballot, and availability of the system. We view electronic ballot return as high risk. **Securing the return of voted ballots via the internet while ensuring ballot integrity and maintaining voter privacy is difficult, if not impossible, at this time [emphasis added].**”<sup>3</sup> Nothing has changed; no new internet technology has been created to mitigate this risk.

We thank you for considering these provisions and for considering our testimony.

Respectfully submitted,

Mark Lindeman, Ph.D.  
Director

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<sup>2</sup> National Academies of Science, Engineering, and Medicine, 2018. “Securing the Vote: Protecting American Democracy.” Washington, DC: The National Academies Press. <https://doi.org/10.17226/25120>

<sup>3</sup> DHS Memo. <https://www.politico.com/f/?id=00000172-9406-dd0c-ab73-fe6e10070001>