Voter's Choice Act Research Brief Series

California Voter's Choice Act: Key Considerations on Implementation





Signed into law by Governor Jerry Brown in 2016, the California Voter's Choice Act (VCA) is designed to transform the voting process in California. The law offers California counties the choice of adopting a new voting model that includes mailing Vote-By-Mail (VBM) ballots to all registered voters, and replacing neighborhood polling places with vote centers distributed throughout the county available to all voters up to ten days before Election Day. Vote Centers offer a range of voter services including in-person voting, accessible voting options, mail ballot drop-off and conditional voter registration.²

This brief is based on the findings of an extensive study of the five counties (figure 1) that adopted the VCA in 2018. With the goal of informing VCA implementation in 2020 and beyond, this brief focuses on the following questions:

- 1. How do election officials define a successful implementation of the VCA?
- 2. Which factors should county election officials consider when deciding to adopt the VCA?

To understand how counties and communities can prepare for successful implementation, we conducted 40 confidential in-depth interviews with election officials, statewide voter advocacy groups, community groups, and other stakeholders involved in implementing the VCA in 2018. Twelve of these interviews were conducted with election officials from VCA and non-VCA adopting counties, some of whom have had an implementation advisory role at the statewide level. We further conducted six focus groups with community groups and stakeholders, a survey of community based organizations, social media analysis, and gathered public education and outreach materials used by election officials and stakeholders in VCA counties and Los Angeles. This brief focuses on the perspectives of election administrators. Our full report, to be released in late Spring 2019, will incorporate the perspectives of diverse stakeholders and explore additional elements of VCA implementation.

About the Voter's Choice Act

The California Voter's Choice Act provides an optional new voting model to counties. In counties choosing to adopt the new model, every registered voter is mailed a Vote-by-Mail (VBM) ballot, which voters can either mail in, or return at a ballot drop box or a newly-established vote center.

At vote centers, which replace traditional neighborhood polling places, voters can cast their ballots in person, drop off their completed VBM ballots, access conditional voter registration, receive replacement ballots, and access additional resources, such as language assistance and accessible voting machines. While there are fewer vote centers than polling places by design, vote centers are open to voters for up to ten days prior to Election Day and available for all voters to utilize countywide. The expectation is that voters could choose to cast their vote by mail or drop box, and those desiring an in-person experience (e.g., using an accessible voting system, location convenience or for a sense of community) would have numerous dates to do so rather than just one.



Fourteen of California's 58 counties were eligible to adopt the model for the 2018 election cycle, and five counties did so—Madera, Napa, Nevada, Sacramento and San Mateo. All other California counties are eligible to adopt the model in 2020. In 2020, Los Angeles County will opt in to the model but will not be required to mail all registered voters VBM ballots until 2024.³ In addition to Los Angeles County, the following counties have publicly announced (as of this brief's publication) that they will adopt the VCA for the 2020 election cycle: Fresno, Mariposa, Orange and Santa Clara (see figure 1). All together, ten California counties will be conducting elections under the Voter's Choice Act in 2020—approximately half the state's current registered voter population.⁴

Glossary

- Conditional Voter Registration (CVR): CVR allows eligible voters to register or update their voter registration information after the deadline. CVR ballots are counted once the county elections official has verified the registration. CVR is also commonly referred to as Same Day Registration.
- **Provisional Ballot:** Any voter whose registration cannot be confirmed while voting in person has the right to vote using a provisional ballot. Provisional ballots are counted if election officials have verified that the voter is registered to vote in the county and has not already voted.
- Language Accessibility Advisory Committee (LAAC): VCA-adopting counties are required to establish a county LAAC to advise the county elections office as it relates to access to the electoral process for voters with limited English proficiency. Some non-VCA counties also have a LAAC.
- Voting Accessibility Advisory Committee (VAAC): VCA-adopting counties are required to establish a county VAAC to advise the county elections office as it relates to access to the electoral process for voters with disabilities. Some non-VCA counties also have a VAAC.
- Election Administration Plan (EAP): VCA-adopting counties are required to establish an Election Administration Plan, which details how the county intends to meet all requirements of the VCA, including how the election office will engage the public and conduct outreach. The county must open the EAP for public comment before it is finalized. See the California Secretary of State's VCA Quick Start Guide.

1. How do election officials define a successful implementation of the VCA?

When California policymakers proposed the Voter's Choice Act in 2016, most proponents publicly projected several benefits, including: reduced election administration costs, convenience for voters, and the potential to increase voter turnout.⁵ Election officials charged with considering and implementing the VCA in their counties identified a broader set of potential indicators and expectations, especially in the first few election cycles after adoption:

- Accurate and efficient administration of the election, including expectations of modest cost reductions in the long term;
- · Reduction in the use of provisional ballots; increased use of conditional voter registration (CVR);
- Effective outreach to voters through engagement of stakeholder groups;
- · Increased voter turnout, accounting for contextual factors influencing turnout for that year.

i. Accurate and Efficient Election Administration

All election officials we spoke with identified the efficiency of election administration for the county as a critical measurement of success. This includes the reliable execution of both the legal and technical requirements of an election (e.g. electronic poll books and ballot-on-demand printers), vote center and ballot drop box site selection, vote centers and ballot drop boxes with sufficient capacity for the anticipated volume, and efficient processing at each vote center location. See the Secretary of State's VCA Ouick Start Guide for more information on the administrative requirements of the VCA.

As one election official summed up,

"[Measurements of success include:] Were you able to really handle all the technology challenges for that day or for that period you had the vote centers open? Did you have any vote centers go down at critical times? Did you have any long lines? I see that the change is CVR [Conditional Voter Registration], and so that's where vote centers are really going to play a big role. How were those vote centers able to handle voters coming in and registering to vote and voting E minus 15 [fifteen days prior to Election Day, the deadline to register to vote] through Election Day?"

While the potential of administratively easier and more efficient elections is a significant draw to VCA adoption, several officials cautioned that it should not be the primary reason for adoption. As one election official argued, "From my perspective, for the VCA to be truly successful, more emphasis needs to be placed on the benefits for the electorate overall and that it should not be viewed as simply a method of making the administration of elections easier and more streamlined."

Even though election officials commonly noted election cost reduction as a key reason to adopt the VCA when the law first passed, many of the current and potential VCA election officials interviewed noted that they didn't expect to get a return on their financial investment in the first election cycle. Further, for some election officials, cost reduction is not primarily how they measure success, at least not during the initial implementation process. As one VCA election official explained,

"I think moving into 2020 we're going to compare what we can do in 2020 as to what we did in 2016. So, while conducting the election in 2020 may cost more than 2018, our hope is that is doesn't cost more than 2016. If we don't save any money, I think we may have resigned ourselves that this is not a more affordable way to conduct elections, but it is still a better way to conduct elections because at the end of the day cost is always a concern, but it's not our first concern."

This being noted, several election officials did initially expect the cost of implementation to be less than what their counties actually experienced, with some election officials indicating that they hope that potential changes to the VCA's county election administration requirements could result in future cost savings.

With regard to the presence of long lines at select vote centers, some elections officials attributed lines to the challenge of changing the habit of voting primarily on Election Day, and hope to see a reduction of lines in the future by encouraging in-person voters to vote in advance of Election Day. Other elections officials identified the use of conditional voter registration (CVR) as a primary source of lines, as CVR takes more time to process, and that process improvements at vote centers could significantly reduce lines.

ii. Provisional Voting and Conditional Voter Registration

In the 2018 General Election, 970,520 provisional ballots were cast across the state of California (889,707 were counted, an acceptance rate of 91.7%).⁶ For most election officials, a significant reduction in the number of provisional ballots is an important goal, in part because provisional ballots are time-intensive to process. According to one official,

"A big measure of success from my perspective would be a reduction, or near elimination, of provisional ballots because those issues can all be resolved onsite at the vote centers when the voters appear."

Further, many election officials emphasized that a key measure of the VCA's success was seeing a large number of voters using conditional voter registration (CVR) to register or update their voter registration at vote centers, as this could indicate increased participation from eligible voters who would have otherwise not been able to vote. According to the California Secretary of State's Office, in the 2018 General Election, over 57,000 Californians used CVR and 32% of these voters were in the five VCA counties. Several VCA county election officials noted plans to develop additional strategies to expand use of conditional voter registration in upcoming elections.

California Voter's Choice Act Requirements on Community Consultation

- VCA county officials are required to draft an election administration plan (EAP) in consultation with the public.
- These draft plans must be developed in consultation with a Language Accessibility Advisory Committee (LAAC) and a Voting Accessibility Advisory Committee (VAAC).
- These advisory committees must be established by October 1 prior to an election year, and they are required to hold their first meeting by April 1 of the election year.
- VCA county officials are encouraged to develop, recruit, launch, and utilize input from their LAAC and VAAC prior to the public consultation period for the Election Administration Plan (EAP).
- County officials must give public notice and accept public comment for at least 14 days prior to a public hearing on the draft EAP and, upon adopting the final plan, submit the EAP's sections on voter education and outreach to the California Secretary of State.
- The Secretary of State shall "approve, approve with modifications, or reject a voter education and outreach plan" within 14 days of receiving it.
- The county shall post the draft plan, amended plan, and adopted final plan for election administration on its web site, with language translations and in a format that is accessible for people with disabilities.

iii. Effective Outreach and Education

Many of the election officials interviewed stated that a successful implementation of the VCA would need to include sufficient outreach, so that voters are aware of the changes and are informed about the new services and voting options available to them. These officials noted that satisfactory outreach would necessitate significant collaboration with community advocacy groups. One official described the key as "working with and talking with the community based organizations in the county. Having a successful LAAC and VAAC [and other] advisory committees, getting their input, so people feel engaged." See the Voter's Choice California report, Strategies for Voter Education and Outreach Under the Voter's Choice Act for recommendations for voter education and outreach. An in-depth discussion about election official and community group recommendations for improving voter education and outreach will be included in this study's full report.

Most election officials emphasized the importance of encouraging voters to vote early, particularly if they prefer a vote center experience. However, nearly all election officials interviewed were uncertain how realistic this expectation would be, given voter activity was reported to be light in the early days of 11-day and 4-day vote center availability in both the 2018 Primary and General Elections. As one election official explained, vote centers on "Election Day [have] the heaviest volume, heaviest traffic, highest percentage usage, without question. So those early days, you're spending a lot of money on employees and rentals and all that other stuff [and] it might just be underutilized because people aren't changing their behavior." However, as several officials noted, the culture of in-person voting on one single day will require more than one election cycle to change, and encouraging early use of the vote centers will need to be an ongoing effort.

iv. Voter Turnout

There are many factors that can impact voter turnout, including a competitive local election or the national political context in which an election takes place. Assessing the impact of a new election model on turnout, therefore, is a difficult task. Only two election officials from VCA counties cited an increase in voter turnout as an important indicator of a successful implementation of the VCA. One additional election official cited greater turnout, specifically of populations who are historically underrepresented in the electorate, as a critical element of success. However, most of the other election officials interviewed indicated that while increased voter turnout would certainly be a positive outcome of adopting the VCA, it is not their primary metric. As one election official explained, the voter experience is an important consideration as well: "We want to streamline costs. We want to make it more convenient. Even though [the VCA] may not result in higher participation, those who do participate may be happier with this process as a result of it." Election officials indicated that the success of the VCA cannot be assessed on a single year of turnout data—pointing to the 2018 electoral context as particularly dynamic, with particularly competitive, high-visibility elections and extensive "get out the vote" efforts driven by regional political campaigns that varied across counties and over election cycles. One election official explained

"I can tell you how I do not define [a successful implementation], is by voter turnout. If you look across the state, there was record turnout in almost every county. And one county may have a particular hot button issue or a supervisorial race that draws a lot of people out as compared to another county. It's just difficult to measure."

For research on the impact of the VCA on voter turnout in 2018, see the <u>New Electorate Study's</u> research brief: How Did the Voter's Choice Act Affect Turnout in 2018?

2. Which factors should county election officials consider when deciding to adopt the VCA?

Election officials interviewed as part of this study provided a number of suggestions for counties that are considering adoption of the VCA in 2020 or beyond. These include the following elements:

- · Significant investment of time and resources
- · Preparation of election operations
- Collaboration with stakeholders
- Understanding voter experiences

i. Significant Investment of Time and Resources

Most election officials interviewed emphasized that a successful implementation of the VCA requires a major investment of election staff time throughout the entire implementation process. The process for developing the Election Administration Plan (EAP), locating acceptable vote center and ballot drop box sites, hiring and training of adequate vote center staff—who typically work multiple days at vote centers versus only Election Day in a polling place model—are all long processes that take a significant amount of time and resources, including additional staff costs. One VCA election official pointed out that vote center staff are required to have more extensive training and higher levels of competency than polling place workers, and other VCA election officials interviewed noted that their staffing costs increased.

See the <u>Secretary of State's VCA Quick Start Guide</u> for more details on the resources needed for the VCA implementation process. As one VCA election official explained, "Plan ahead, allocate resources for voter education, allocate resources for vote centers, and allocate resources for technology and the different systems... The human side of the equation and the technological side of the equation are really important in terms of resource allocations."

Elections officials recommended that other counties develop a budget with room for unforeseen costs related to implementing a new system. As one VCA election official said, "I think that [election officials] need...to be very generous, or give themselves a little bit of room when they construct their budgets for implementation. Things pop up, you know?" Another VCA election official found that their budget for operating vote centers was double that of polling places in previous election cycles, despite having fewer vote centers. This official explained that there were some previous no-cost polling place locations unavailable to host vote centers over multiple days, and those that did host vote centers frequently came with additional costs.9

While three of the VCA-adopting counties needed to purchase new voting equipment for the 2018 General Election, only the election officials from two counties reported an identifiable cost-savings in this area. As one explained, "With the acquisition of the new voting system, we estimated we would've had to spend double if we got a new voting system for a polling place model. So right off the bat for equipment, [the VCA] did help us." Another VCA election official advised,

"[If] they're going into this thinking it will be easier, that it will take less time and cost less money, they are destined to consider this a failure. If they see it as something that is a tremendous amount of work that requires significant time to develop and deploy, and implement…and that work is rewarded through an increased turnout, a more convenient and accessible process for their customers, then I think it'll be successful."

Election officials also said that the time it takes to involve community partners in the implementation process, as required by the VCA, is an important consideration for counties deciding to adopt. This includes community engagement in both the planning phase of implementation and voter outreach phase, both of which require staff time and resources to guarantee effective engagement. One VCA election official said counties need to be open to a higher level of community engagement than they are used to, particularly around voter education. Similarly, another VCA election official advised other counties to have "a clear expectation of the time and resources that are needed to do the level of stakeholder engagement that is both required in the VCA...[and] what's necessary specific to your particular community." See the Secretary of State's VCA Quick Start Guide for more details on the VCA's requirements for community engagement.

ii. Preparation of Election Operations

Managing logistics and security around vote-by-mail ballot collection, securing voting equipment, and managing the check-in process at vote centers are all critical components to consider, along with ensuring effective signage at vote centers. Election officials also emphasized the difficulty of finding facilities that can be reserved as vote centers for multiple days. Nearly every VCA county election official interviewed said they needed more space at vote centers, more parking, and more equipment in 2018 than they had expected. In particular, the size of vote center facilities and their resulting capacity for voters, voting privacy and voting equipment can be a significant factor in avoiding lines. In discussing needs around facility size, one election official advised, "Just whatever you think is big enough, isn't."

One election official summarized the challenges they saw at their county's vote centers,

"Everybody has a ballot in their hand, so they don't have to come to a vote center... yet people do need services there. They move. The conditional voter registration, that was big. People dropping off ballots was huge. And people wanting to vote on voting machines was big. So, we realized that, and we're making adjustments for that."

How the movement of voters through vote centers is managed also contributes to how efficiently voters are served and whether they experience lines. One election official explained, "How you manage the check-in process [at a vote center] is going to be key to making it a positive experience for the voter. Don't cut yourself short on the number of check-in lines or stations that you would have."

One VCA election official described how they were able to alleviate bottlenecks in the General Election by learning from the problems of long lines and congestion during the Primary Election—primarily by offering curbside ballot drop off and better signage.

As noted earlier in this brief, election officials we spoke with explained that notable cost cutting is likely not on the immediate horizon for counties adopting the VCA, although there is an expectation by most election officials that counties will see some cost reductions in the long run. Consequently, several election officials emphasized that counties who are considering adopting the VCA should understand this and make accommodations for it before deciding to implement the VCA.

iii. Collaboration with Stakeholders

Every election official from VCA counties that we interviewed identified the benefits of robust engagement with community groups and other stakeholders, not only during the voter education and outreach phase of implementation, but also early on during the planning phase of implementation. These benefits extend beyond simply meeting the requirements for engagement present in the VCA, such as the creation of a LAAC and a VAAC. One election official described the benefits to working effectively with community and advocacy groups, advising others to "make sure they get everybody on board that they can, whether it's advocacy groups or agencies out there that can help them. Whatever it is, get them on board because they'll help advertise. They'll help get the word out that this is how we're doing elections now, and that will help make it successful."

At the same time, several election officials also acknowledged that the level of engagement required by the VCA is typically new for county election offices and that gaining the skills to do this engagement requires a strong commitment by election officials, one that extends beyond time and resources alone. One election official noted that colleagues considering implementation need to be open to a much higher level of engagement, particularly around working with their communities on voter education.

iv. Understanding the Voter Experience

Several election officials noted their concern over the long lines at some vote centers on both the Primary and General Election Days. These election officials suggested that there are improvements to be made to vote center operations so that long lines do not discourage would-be voters from voting. One official who considered the high volume of voters to be a success, suggested that how voters experience lines on Election Day could also be dependent on their expectations around the voting process.

"The issue is again managing voter expectations and voter use of the vote centers... It's successful that we have long lines, unfortunately. It would be nice if we could manage the success by getting some of those people earlier into the process."

As mentioned earlier in this brief, election officials emphasized that one aspect of a successful implementation is utilization of conditional voter registration (CVR). They also identified that the use of CVR on Election Day was one cause of long lines at vote centers. To begin to address how to help reduce long lines at vote centers and elections offices in future elections, the California Association of Clerks and Election Officials (CACEO) recently established the Line Busting Committee (LBC).10 As one election official said, "If there are [lines] happening at a vote center, then that's not a success... It's for vote center and non-VCA counties to figure out how we can, for that Monday and Tuesday, handle the potentially huge number of voters that either want to change their registration or want to newly register to vote." Finding a long line of cars at a ballot drop off site, one election official was able to help alleviate parking lot congestion by having several election staff walking up and down the line collecting ballots.

From the election official perspective, a better voter experience will therefore entail both improvements on vote center operational logistics and voter outreach, so that voters are aware of the services that are available to them before Election Day and that accessing these services goes smoothly. Many officials acknowledged that collaborating with community groups was vital for communicating with voters about the changes occurring from the VCA.

Another election official emphasized the important role vote center workers have in providing a good voter experience, advising counties to "[have] a great training program for your vote center workers, because they are the ambassadors of democracy. That's a very key thing, to make sure they're trained and energized in community and customer service oriented."

One election official explained that another important component of the voter experience is the number of vote centers, and the proximity and accessibility of the vote center to the voter. This official suggests counties consider establishing more vote centers than the minimum number required by law. One election official in a county that has not yet adopted the VCA reported that when and/or if they implement, they will try to provide more vote centers than the minimum number required by law in order to "limit the impact on voters so that they're not as shocked by the loss of polling places."

Applying the Study's Findings

The first step for successfully implementing the Voter's Choice Act is having a clear sense of what success looks like in a county. Election officials have identified a nuanced set of markers for success that focuses on the following:

- Accurate and efficient administration of the election, including expectations of modest cost reductions in the long term;
- · Minimal use of provisional ballots; and efficient use of conditional voter registration (CVR);
- Substantial county engagement of voters through community-based organizations and county Language Accessibility Advisory Committees (LAAC) and Voting Accessibility Advisory Committees (VAAC), and meaningful incorporation of voter input;
- Election officials note that while they hope to see increased voter turnout and decreased election administration costs over time, turnout and cost are not significant markers of a successful implementation.

According to election officials, factors that should be considered when deciding whether to adopt the VCA—and when working towards a successful implementation, as they have defined it—requires:

- Extensive time and resources for creating the Election Administration Plan (EAP) and seeking community input on the EAP, for appropriately locating vote centers and ballot drop off sites, and adequately hiring and training staff to work at the sites;
- Detailed planning for the efficient administration and management of the flow of voters through vote centers;
- Meaningful collaboration with stakeholders and community organization throughout the entire implementation process, including in the siting process and with education and outreach;
- Conducting comprehensive voter education and outreach, especially around all the options and services offered by the VCA;
- A positive voter experience entails efficient vote center operational logistics, the reduction of long lines and robust voter outreach efforts, to help increase voters' awareness and ensure successful use of vote center services that are available to them before Election Day.

Collectively, the study's findings emphasize the complexity involved in a county's assessment of whether it should adopt the Voter's Choice Act. How county election officials define successful implementation helps inform what they see as the key considerations in the choice to adopt. A key theme that emerged from our analysis is the importance of the voter experience under the VCA. We heard from election officials that while the VCA was intended to positively enhance voters' experiences through more voting choices and services, it also has the potential to inconvenience some voters, such as with lines or a lack of understanding in how the new system works. A commitment by election offices to invest in a realistic and sufficient allocation of resources for both the VCA's administrative and collaborative outreach components is critical to increasing the likelihood of positive voter experiences under the new system.

Available Resources for the VCA Implementation Process

California Secretary of State: VCA Quick Start Guide

https://elections.cdn.sos.ca.gov/vca/2020/toolkit/sos/quick-start-quide-1.0.pdf

California Secretary of State: VCA Starter Kit

https://elections.cdn.sos.ca.gov/vca/2020/toolkit/sos/vca-starter-kit-1.0.pdf

Voter's Choice California: Strategies for Voter Education and Outreach

Under the Voter's Choice Act VCC and others

https://voterschoice.org/wp-content/uploads/VCA-Report-1.pdf

Voter's Choice California: Resources

https://voterschoice.org

The New Electorate Study: How Did the Voter's Choice Act Affect Turnout in 2018?

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USC Price School of Public Policy California Civic Engagement Project

The California Civic Engagement Project was established at UC Davis in 2011 and moved to the USC Sol Price School of Public Policy in Sacramento in 2018. The CCEP conducts research to inform policy and on-the-ground efforts for a more engaged and representative democracy, improving the social and economic quality of life in communities. The CCEP is engaging in pioneering research to identify disparities in civic participation across place and population. Its research informs and empowers a wide range of policy and organizing efforts in California aimed at reducing disparities in state and regional patterns of well-being and opportunity. Key audiences include public officials, advocacy groups, political researchers and communities themselves. To learn about the CCEP's national advisory committee or review the extensive coverage of the CCEP's work in the national and California media, visit our website at http://ccep.usc.edu/.



University of California Riverside Center for Social Innovation

The Center for Social Innovation (CSI) aims to provide a credible research voice that spurs civic leadership and policy innovation. We also aim to integrate researchers, community organizations, and civic stakeholders in collaborative projects and long-term partnerships that boost collective impact. Importantly, the Center seeks to shift away from a "problem" narrative to an "opportunity" narrative for marginalized communities and localities. The Center for Social Innovation focuses on five key areas: Civic Engagement, Economic Mobility, Immigrant Integration, Leadership and Entrepreneurship, and Placemaking.

Sources

- 1. Los Angeles County is the one exception; the county elections office is not required to mail all registered voters VBM ballots until 2024.
- 2. For more information on California Senate Bill 450, The Voter's Choice Act, see: http://leginfo.legislature.ca.gov/faces/billNavClient. xhtml?bill id=201520160SB450
- 3. See above, Note 2.
- 4. See the California Secretary of State Report of Registration February 10, 2019. https://www.sos.ca.gov/elections/report-registration/ror-odd-vear-2019/
- For analysis of Senate Bill 450, The Voter's Choice Act, see http://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=201520160SB450
- 6. See the California Secretary of State Provisional Ballot report for the 2018 General Election at: https://www.sos.ca.gov/elections/prior-elections/statewide-election-results/general-election-november-6-2018/
- 7. See the California Secretary of State Conditional Voter Registration (CVR) report for the 2018 General Election at: https://www.sos.ca.gov/elections/prior-elections/statewide-election-results/general-election-november-6-2018/
- 8. For an explanation of the required elements of the Voter's Choice Act, see above, Note 2.
- 9. An Assembly Bill (AB 59) is currently in the California State Legislature, and would require public college campuses to host vote centers. Election officials expect that, should this bill pass, it will facilitate the vote center siting. http://leginfo.legislature.ca.gov/faces/billTextClient. xhtml?bill id=201920200AB59
- 10. The Line Busting Committee (LBC) is a subcommittee of the Legislative Committee of the California Association of Clerks and Election Officials (CACEO).