



**STATE OF ALASKA**  
OFFICE OF THE GOVERNOR  
**JUNEAU**

**MEMORANDUM**

**TO:** Whom it May Concern

**DATE:** June 9, 2025

**FROM:** Guy Bell  
Public Records Officer  
Office of the Governor

**SUBJECT:** Elections 2020  
Report Update

The July 13, 2020, report, titled "*Review of the Effectiveness and Security of the Division of Elections in Administering Alaska's Elections*," was executed by then-Commissioner of the Alaska Department of Administration, Kelly Tshibaka. The report's purpose was to review Alaska's election system and provide recommendations on how to strengthen the integrity of our elections. The analysis "*found that the DOE [Division of Elections] adequately complies with state and federal election laws.*"

Since the report's completion, the State has released a redacted version of the report. The redactions protected the security of State election systems and privileged internal insights, interpretations, analyses, opinions, and recommendations. The redactions safeguarded critical elections infrastructure from potential attack and exploitation. Further, they were consistent with the goals of ensuring high-quality decision-making by promoting open discussions among government officials.

In the past five years, the Division of Elections has taken significant steps to address security and operational issues within the scope of its statutory authority, and key State systems and processes have undergone substantive changes to mitigate security concerns. Accordingly, a comprehensive review of the redactions took place this spring.

That review found that disclosing the redacted information would no longer raise security concerns and that waiving the privileges now would be less likely to have the adverse effects that were previously identified. For these reasons and because members of the public continue to request the unredacted report, an unredacted version of the report is being released.

Regarding the report's eighteen recommendations, thirteen have been implemented. To implement four recommendations, Governor Dunleavy introduced election legislation, which has not yet

passed the Alaska Legislature. The Division of Elections determined that one recommendation is impractical. The Division of Elections prepared the following summary of the status of each recommendation.

#	Recommendation	DOE Action / Status	Notes
1	Consider Implementing Signature Comparison Software	Not Implemented	<ul style="list-style-type: none"> <li>State law does not require signature matching and DOE does not currently use signature comparison software to analyze, compare, or verify voter signatures on absentee ballots to determine their authenticity or match them to a known reference.</li> <li>Use of signature comparison software was a requirement in proposed legislation, including Senate Bill 138, introduced by the Senate State Affairs Committee in 2023. The bill did not pass.</li> <li>The cost of implementation was estimated at a total of \$5 million to purchase signature verification systems for each of DOE's five regions.</li> </ul>
2	Create a Vendor Risk Management Policy	Implemented	<ul style="list-style-type: none"> <li>A Vendor Risk Management Policy is standard practice set by the State Office of Information Technology (OIT) and the Office of Procurement &amp; Property Management, which DOE is subject to.</li> <li>A System Security Plan (SSP) must be submitted to and approved by the State Security Office before any new or significantly modified system enters production. This is also included in the State Procurement procedures and processes.</li> </ul>
3	Continue to Monitor and Improve the Process to Ensure Voter Rolls are Current and Accurate	Implemented	<ul style="list-style-type: none"> <li>DOE conducts annual voter registration list maintenance from December through February and other times throughout the year. List maintenance is required by State and federal laws, which limit DOE's ability to remove voters from the voter list.</li> <li>To enhance the efficiency and timeliness of the list maintenance process, the Governor introduced House Bill 63 and Senate Bill 70 during the current legislative session. These proposals seek to shorten the timeframe for removing inactive voters from the voter list and establish two additional conditions for notifying certain voters.</li> <li>A Senate State Affairs Committee bill, this year's Senate Bill 64, also proposes changes to shorten the time to remove inactive voters and add conditions.</li> </ul>

#	Recommendation	DOE Action / Status	Notes
			<ul style="list-style-type: none"> <li>• These bills are still pending in the legislature.</li> <li>• In 2022, the Governor introduced House Bill 286 and Senate Bill 167 to require DOE to review certain records when conducting voter list maintenance and consult with a subject-matter expert to audit the voter list. The Legislature did not pass these bills, although similar provisions have been incorporated into Senate Bill 64 this legislative session.</li> </ul>
4	Develop Policy, Procedures, and Training for Voter Fraud Prevention and Response	Implemented	<ul style="list-style-type: none"> <li>• DOE trains all its employees on what to look for and what to do if they encounter something that could be indicative of voter fraud.</li> <li>• The Alaska State Troopers (AST) and the Department of Law (LAW) have presented to DOE staff on the preservation of evidence when fraud is suspected.</li> <li>• DOE refers cases of suspected fraud to LAW and works closely with the AST investigator who oversees election fraud cases.</li> </ul>
5	Recruit a Bench of Back-Up Election Officials	Implemented	<ul style="list-style-type: none"> <li>• DOE is continually working to recruit and retain election workers.</li> <li>• In the 2024 election, State employees were strategically staged in hub locations in rural Alaska for deployment to areas where election workers were needed. This partnership is expected to continue for future elections.</li> <li>• Senate Bill 64, pending in the current legislature, includes a rural community liaison position to support recruiting election workers in rural areas, among other duties.</li> </ul>
6	Employ Risk-Limiting Audits to Validate Election Results	Not implemented	<ul style="list-style-type: none"> <li>• DOE has a detailed and robust audit process, as required by current law. DOE conducts a hand count of ballots from one randomly selected precinct in each house district.</li> <li>• A risk-limiting audit uses statistical methods to reduce the chances that an election result would be inconsistent with the result of a recount. As stated in the report, such an audit would require changes to how ballots are counted and possibly statutory changes.</li> <li>• Senate Bill 64, pending in the current legislature, includes a provision for risk-limiting audits.</li> </ul>

#	Recommendation	DOE Action / Status	Notes
7	Audit Precincts in which Unexplained Discrepancies Occur	Implemented	<ul style="list-style-type: none"> <li>Current law requires DOE to audit precincts with unexplained discrepancies. If the random hand count reveals a discrepancy of more than one percent, DOE hand counts the entire district.</li> <li>DOE may also hand count any precinct with an unexplained discrepancy. No reports of unexpected discrepancies have occurred since the date of the report.</li> </ul>
8	Consider Implementing Hand Count Verification Process of All Precincts Using Optical Scan	Not Implemented	<ul style="list-style-type: none"> <li>This would require a statutory change because current law only provides for hand counts of random precincts or those with unexplained discrepancies.</li> </ul>
9	Continued Review of Making Vote by Mail a Possible Alternative to In-Person Voting in Non-Road Connected Rural Areas May be Merited, but Faces Serious Difficulties	Implemented	<ul style="list-style-type: none"> <li>Alaska is a no-excuse absentee voting state. Anyone can apply to vote absentee by mail.</li> <li>Expanding by-mail voting would require a statutory change.</li> <li>The Governor introduced House Bill 63 and Senate Bill 70, pending in the current legislature, which would allow elections to be held by mail in communities with populations of 750 or less.</li> </ul>
10	Re-Examine Rules Surrounding Absentee Ballots to Determine if Changes Can Be Made to Expedite Elections or Enhance Integrity of the Voting Process	Implemented	<ul style="list-style-type: none"> <li>Voters can currently track their ballots through DOE's My Voter portal.</li> <li>The Governor introduced House Bill 63 and Senate Bill 70, currently pending in the legislature, which would expedite results by requiring that all absentee ballots be received by election day.</li> <li>Senate Bill 64, pending in the current legislature, proposes additional ballot tracking and an absentee ballot notice and cure process.</li> </ul>
11	Work with the Legislature to Repeal or Amend the Permanent Fund Dividend Automatic Voter Registration Program	Not Implemented	<ul style="list-style-type: none"> <li>Repealing or amending the Permanent Fund Dividend (PFD) Automatic Voter Registration (AVR) process would require a statutory change.</li> <li>The Governor introduced House Bill 63, and Senate Bill 70, currently pending in the legislature, which propose eliminating PFD AVR.</li> <li>The Governor also introduced House Bill 286 and Senate Bill 167 in 2022 to make PFD AVR an opt-in process, which the legislature did not pass.</li> </ul>

#	Recommendation	DOE Action / Status	Notes
12	Conduct DHS Security Risk and Vulnerability Assessment Testing	Implemented	<ul style="list-style-type: none"> <li>Department of Homeland Security's (DHS) Cybersecurity and Infrastructure Security Agency (CISA) regularly conducts security risk and vulnerability testing for DOE.</li> <li>DOE contracts with third-party monitoring services to monitor the open web, dark web, and network traffic for threats.</li> </ul>
13	Work with the State Security Office and the Office of Information Technology to Develop a Cybersecurity Preparedness Plan	Implemented	<ul style="list-style-type: none"> <li>DOE's Cybersecurity Preparedness plan was developed in 2021.</li> </ul>
14	Give OIT Authority Over the DOE's Cybersecurity	Implemented	<ul style="list-style-type: none"> <li>DOE systems were integrated into the State Security Office continuous cybersecurity monitoring framework in 2020.</li> </ul>
15	Create an Incident Response Plan	Implemented	<ul style="list-style-type: none"> <li>Incident Response planning is part of the State Security Office standards DOE participates in.</li> </ul>
16	Consider Enlisting the Assistance of a 3rd Party Cybersecurity Provider for Enhanced Cybersecurity Options	Implemented	<ul style="list-style-type: none"> <li>As provided in response to Recommendation 12, DOE contracts with third-party monitoring services. Additionally, DHS CISA provides cybersecurity services and support to DOE.</li> </ul>
17	Improve Collaboration Between DOE and SSO	Implemented	<ul style="list-style-type: none"> <li>Improved coordination has been achieved, as DOE is now behind the State Security Office firewall.</li> <li>DOE and OIT leadership began holding regular election security meetings leading up to the 2022 and 2024 elections.</li> </ul>
18	Re-Explore the Option of Securing Voting Equipment in Regional or Local Rural Precincts	Not Implemented	<ul style="list-style-type: none"> <li>Election equipment must be programmed and tested before each election, making this recommendation impractical.</li> </ul>

