



NORTH CAROLINA STATE BOARD OF ELECTIONS

Mailing Address:
P.O. Box 27255
Raleigh, NC 27611

(919) 814-0700 or
(866) 522-4723

Fax: (919) 715-0135

Numbered Memo 2020-25

TO: County Boards of Elections
FROM: Karen Brinson Bell, Executive Director
RE: Absentee Board Meetings
DATE: September 22, 2020 (updated September 23, 2020, and September 18, 2023)

This numbered memo addresses the requirements and procedures for conducting absentee ballot meetings, as set forth in state law. It also addresses questions that are commonly asked in connection with absentee meetings or the review and custody of absentee ballots.

Legal Requirements for Absentee Meetings

General Requirements

Beginning every Tuesday on the fifth Tuesday before Election Day, county boards of elections must hold a public meeting at 5:00 p.m. to review and act upon absentee ballots.¹ The county board of elections may change the time of these meetings (to an earlier or later time) and may provide for additional meetings. However, absentee meetings may not be held prior to the fifth Tuesday before Election Day. Any meetings that are held at a different time on Tuesdays and any additional meetings must be noticed in a county newspaper at least 30 days prior to the election. You must also send notice of absentee meetings to your regular notice list, including to the county political parties.

At each absentee board meeting, the board must act upon all absentee container-return envelopes received prior to that meeting and after the previous absentee meeting.² An absentee meeting must be held if there are any absentee ballots (absentee by mail or one-stop early voting ballots) for the board to review. Absentee meetings should only be cancelled if the board has not

¹ G.S. §163-230.1(f).

² See G.S. § 163-230.1(e): “*At its next official meeting after return of the completed container-return envelope with the voter’s ballots, the county board of elections shall determine whether the container-return envelope has been properly executed.*” (Emphasis added.)

received any absentee container-return envelopes since the last absentee meeting.³ If you anticipate a high volume of absentee ballots returned, it is strongly recommended that your board schedule additional absentee board meetings and/or begin meetings earlier than 5:00 p.m.

A county board may recess an absentee board meeting to a date and time certain if it is not possible to complete review of absentee ballots during the specified meeting period. The notice should be sent as soon as possible but it is not required to be sent 48 hours in advance of the reconvened meeting if that is not possible based on when the meeting was recessed from.

To determine how many additional absentee meetings you need to schedule, consider how many absentee ballot requests your county has received to date, how many total requests your county received for a similar election in the past, and estimate how many requests you anticipate based on the county's current rate of requests. For example, if your county received 6,000 requests in November 2016 and you anticipate a 50% increase for the November 2024 election, that would be 9,000 requests total. If you have six absentee board meetings and everyone who requested a ballot returned one, your board would need to consider approximately 1,500 ballots per meeting. If your board scheduled ten absentee meetings, your board would consider around 900 ballots per meeting.

County Board Member Attendance

Absentee board meetings require a quorum of members present. A quorum is three members.⁴

If at all possible, at least one member from each political party should be represented at each absentee meeting when the board is approving absentee applications. **Because board members must be able to view absentee envelopes in order to approve or disapprove the ballot, a quorum of board members must be physically present during each absentee board meeting.**

Once a quorum is physically present, remaining board members may attend the meetings via live video feed, but they must have a secure way to view the meeting and to participate. They must be able to view all materials that board members are reviewing to make decisions on the absentee envelopes.

³ See G.S. § 163-230.1(f), entitled “*Required Meeting of County Board of Elections*”: “During the period commencing on the fifth Tuesday before an election . . . the county board of elections *shall hold* one or more public meetings each Tuesday at 5:00 p.m. for the purpose of action on applications for absentee ballots.” (Emphasis added.)

⁴ G.S. § 163-31(d): “A majority of the members shall constitute a quorum for the transaction of board business.”

A majority of board members present at a meeting must vote for an action for it to pass.

Public Attendance

Absentee board meetings are public meetings and are subject to North Carolina's open meetings laws. For absentee meetings, it is recommended that the county board locate a meeting room large enough to accommodate members of the public. If it is not possible to procure a sufficiently large space for those who may want to attend in person, the county board of elections should consider broadcasting the absentee board meetings via video feed using a service such as WebEx or Microsoft Teams.

The public in attendance must be able to see and hear the proceedings without compromising the secrecy of any voter's ballot. Staff must ensure that the public cannot view any voted ballots or other confidential information, such as a photocopy of a voter's photo ID included with their ballot or a ballot identifier number (CIV, MIL, etc.), either in person or on a video feed. County board members and staff must be particularly mindful of ballot secrecy when duplicating ballots and inserting ballots into the tabulator.

The public is not permitted to disrupt the process of adjudicating the validity of absentee applications by the board and is not part of the deliberation process during absentee board meetings. The decision of the county board of elections as to the validity of an envelope is final and is not subject to public comment, objection, or review.⁵

Confidentiality of Absentee Register

G.S. § 163-228 requires county boards of elections to keep a register of absentee ballot requests that includes information about the request, the address to which the ballot should be sent, the date of the request, the voter's precinct, and other information. The absentee request register is confidential and not a public record until Election Day.⁶ County boards of elections are not permitted to release copies of absentee request forms or identifying information that could be used to determine that a voter requested an absentee ballot.

⁵ G.S. § 163-230.1(f): "At these meetings, the county board of elections shall pass upon applications for absentee ballots. . . . The decision of the board on the validity of an application for absentee ballots shall be final subject only to such review as may be necessary in the event of an election contest."

⁶ G.S. § 163-228(c).

Absentee request data is no longer confidential when the ballot is returned to the county board of elections office.⁷ Therefore, names of absentee voters may be read aloud during the absentee board meetings, as the ballot has been returned to the county board office at that point. If, however, a ballot has been delivered but there is a deficiency requiring the ballot to be spoiled and reissued, that voter's name cannot be read aloud or otherwise disclosed, because that voter's ballot is still outstanding. Reading from lists of voters who have requested absentee ballots or otherwise releasing the names of voters with outstanding requests is prohibited until the ballot is returned or until Election Day. It is a Class G felony for a person to "steal[], release[], or possess[] the official register of absentee requests for mail-in absentee ballots as provided in G.S. 163-228 prior to the opening of the voting place."⁸ This does not apply to a ballot that has been received by the county board and is in a pending cure status, because at that point the ballot has been returned and it is only the cure certification for the voter's signature deficiency or the voter's photo ID cure documentation that must be submitted for the absentee application to be complete.

Confidentiality of Copies of Photo ID and Information on a Photo ID Exception Form

The photocopy of a voter's photo ID is confidential and not a public record subject to disclosure.⁹ This means that the photocopy of the photo ID cannot be redacted and disclosed, because the entire photocopy is a confidential record under the law. The public is not permitted to view or receive copies of a voter's copy of their photo ID submitted with their absentee ballot.

A Photo ID Exception Form is a public record. However, **the Form is likely to contain confidential information that must be redacted**, when submitted with an absentee ballot. The most common reason for submitting a Photo ID Exception Form with an absentee ballot is likely to be that the voter is unable to make a photocopy of their ID to include with their ballot, which is a "reasonable impediment" specifically identified in the law.¹⁰ When choosing this option, the voter is required to write on the Form their North Carolina driver's license number, DMV ID

⁷ See G.S. § 163-233(b), which makes the list of absentee applications received by the county board a public record.

⁸ G.S. § 163-237(d6).

⁹ G.S. §§ 163-82.10(a1) and 163-233(a).

¹⁰ G.S. § 163-230.1(g)(2).

number, or last 4 digits of their social security number.¹¹ The public is not permitted to view this confidential information during an absentee meeting.¹²

Procedures for Review of Absentee Ballot Materials

At each absentee board meeting, the county board of elections will review each absentee ballot container-return envelope (ballot envelope) to determine whether it has been properly executed and is accompanied by either a photocopy of the voter’s photo ID or a completed Photo ID Exception Form (photo ID documentation), and if so, to approve the application and ballot.¹³ Given the volume of absentee ballots the county board is required to review and act upon at each meeting, certain preparatory work should be performed by staff in advance, and the board should consider ways to streamline the process.

Delegation of Preparatory Work

The county board of elections has the authority to delegate to its director “so much of the administrative detail of the election functions, duties, and work of the board, its officers and members, as is now, or may hereafter be vested in the board or its members as the county board of elections may see fit.”¹⁴ However, the board may not delegate to a director or other staff any of its quasi-judicial or policymaking duties and authority.

Based on the volume of absentee ballots a county board anticipates receiving, the county board should determine which preparatory tasks staff can complete prior to absentee board meetings. **A delegation of administrative duties by the board to the director or staff should occur by majority vote.** The delegation may be by resolution or the approved motion should be documented in the minutes. It should delegate specific preparatory steps that staff can perform prior to absentee board meetings, and the delegation must provide for oversight by the board.

Preparatory steps include:

- Inspecting ballot envelopes and return envelopes for deficiencies and contacting voters as required by [Numbered Memo 2021-03](#). Please note that voters must be contacted within one business day of when staff identify the deficiency. It is not permissible to wait for the absentee board meeting to contact the voter about a deficiency.

¹¹ G.S. § 163-230.1(g)(2).

¹² Similarly, in the rare situation when a voter writes confidential information in the “Other” line on the Photo ID Exception Form, the county board would need to redact that information too.

¹³ G.S. § 163-230.1(e), (f), and (f1).

¹⁴ G.S. § 163-35(d).

- Sorting ballot envelopes with accompanying photo ID documentation into categories for the board to review and take action (*e.g.*, approve or reject).
- Verifying the list of ballot envelopes against the absentee pollbook.
- Performing ballot duplication with a bipartisan team.

A delegation of administrative duties to the director or staff does not need to include a preliminary review of photo ID documentation for deficiencies because this has already been tasked to staff by an administrative rule adopted by the State Board.¹⁵

Staff Review of Envelopes

Upon receipt of an absentee ballot at the county board office, staff must review the materials accompanying the ballot—the photo ID documentation and the ballot envelope/application—to ensure there are no deficiencies.

First, staff must confirm that the voter has included the necessary photo ID documentation and, if so, review that documentation to ensure that it meets the requirements of the administrative code provisions governing the approval of photo ID for absentee ballots, [08 NCAC 17 .0109\(a\)](#) & (b).

If the voter has included a photocopy of their photo ID, then staff should make an initial determination that:

- The ID is a type of ID that is acceptable for voting purposes;
- The ID meets any applicable expiration requirements;
- The name on the ID can be read;
- The photograph on the ID depicts a person (not a shadow or outline of a person); and
- The name on the ID is the same as or substantially equivalent to the voter’s name in their voter record.

If the voter has included a Photo ID Exception Form, then staff should make an initial determination that the voter has:

- printed their name;
- checked the box for at least one claimed exception from the photo ID requirements; and
- signed the Form.¹⁶

¹⁵ 08 NCAC 17 .0109(b).

¹⁶ If a voter is unable to sign the Photo ID Exception Form due to a disability, the person of the voter’s choice who is assisting them can sign the Form on the voter’s behalf and must complete the assistant certification on the envelope. See [Numbered Memo 2022-11](#), p. 3 (Court Order Regarding Assistance for Absentee Voters with Disabilities).

If any deficiency exists with either a photocopy of the voter's photo ID or a voter's Photo ID Exception Form, staff must follow the photo ID cure process in 08 NCAC 17 .0109(b) and as described in [Numbered Memo 2021-03](#).

Second, staff must inspect the absentee ballot envelope to make an initial determination as to whether the envelope was properly executed, and if there is a deficiency with the envelope, whether that deficiency can be cured by the voter. If a voter signature deficiency exists, staff must follow the cure process in [Numbered Memo 2021-03](#).

Third, staff should perform an initial sort of ballot envelopes into categories upon initial review and to present those recommendations to the board at each absentee board meeting. Those categories may include designations for recommended approval, recommended disapproval, envelopes awaiting a cure certification or photo ID cure documentation, and those that staff have questions about that require deliberation by the board. The delegation may also require staff to prepare a report to the board indicating the number of ballot envelopes in each category for reconciliation purposes.

[Board Review of Envelopes](#)

The board may, by majority vote, accept staff's recommendation for absentee ballot envelopes that staff have reviewed and recommended for approval. The delegation must include a process for the board to spot-check the envelopes and photo ID documentation to ensure accuracy and consistency. However, the board must individually review all ballot envelopes that: (1) have been recommended for disapproval by staff, (2) have a cure certification associated with that ballot envelope, or (3) where staff need further guidance from the board as to whether the envelope was properly executed or the photo ID documentation meets all legal requirements.

It is also permissible for bipartisan teams of board members to pair off to review absentee ballot envelopes during each meeting, if the board votes to allow this.

Whether the county board delegates the initial review of absentee envelopes to staff or chooses to have a bipartisan team of board members review envelopes during the meeting, all board members present at the meeting must approve or disapprove the ballots. A decision as to whether an envelope is properly executed and whether the photo ID documentation meets all requirements must be decided by a vote of the board as a whole and not by individual members.¹⁷ A board's decision to disapprove a ballot based on a finding that a voter's Photo ID

¹⁷ G.S. § 163-230.1(f) ("The county board of elections shall constitute the proper official body to pass upon the validity of all applications for absentee ballots received in the county; this function shall not be performed by the chairman or any other member of the board individually."); *see also* 08 NCAC 17 .0109(c) ("Final Review by County Board").

Exception Form is false can only be made by unanimous decision of all members of the board participating in the vote, and that decision must be in writing.¹⁸ A decision to disapprove a ballot for any other reason, or to approve the ballot, is by majority vote.

Review of Photo ID Exception Forms

The board must also individually review all completed Photo ID Exception Forms where staff has indicated that available information may lead the board to conclude that the Form is false. When staff has given this indication to the board, or if a board member raises a question as to the falsity of the Form after staff review, the voter must be given notice and an opportunity to be heard on the information that will be considered by the board, *unless* one or more board members disagree that there are grounds to believe the affidavit is false (in which case there is no need to notify the voter, since a finding of falsity on the Form must be unanimous).¹⁹ If the board is considering a finding of falsity, the board's review of the envelope should remain in a pending status until the absentee meeting at which the voter has the opportunity to be heard, and the board can only make a final decision on the approval or disapproval of the envelope after the voter has that opportunity to be heard regarding their Form. [Numbered Memo 2023-03](#) contains guidance as to what may be considered by a county board when reviewing a voter's Photo ID Exception Form.

Review of Photo ID Photocopies

If the board reviews a photocopy of a voter's photo ID that staff have identified as being acceptable, but unanimously determines that the photocopy of ID does not meet all legal requirements, staff are required to notify the voter.²⁰ If this determination is made at an absentee meeting prior to the county canvass, the board's review of the envelope should remain in a pending status until the county canvass, because in this instance the voter can still submit a new photocopy of their photo ID, or a Photo ID Exception Form if they are unable to submit a photocopy of their photo ID.

Review of Deficient Photo ID Documentation that Is Uncured

If staff has indicated that a voter's photocopy of their photo ID or Photo ID Exception Form is deficient, and the photo ID documentation remains uncured, the board must reserve its *final* decision on the approval of the envelope until the county canvass and, when doing so, must individually review the photo ID documentation that has not been cured.²¹ An uncured

¹⁸ 08 NCAC 17 .0109(c)(2).

¹⁹ 08 NCAC 17 .0109(c).

²⁰ 08 NCAC 17 .0109(c)(1).

²¹ 08 NCAC 17 .0109(c)(3).

deficiency with the photo ID documentation does not prevent the board from making a *preliminary* determination on the envelope when staff has indicated further guidance is needed as to a potential deficiency, so that any envelope-related deficiencies can also be identified and the voter notified.

Formalizing Approval of Envelopes

After absentee envelopes and accompanying photo ID documentation are approved by the board, the task of stamping every envelope with “Approved” and stamping or otherwise affixing the chair’s signature or initials to the ballot envelopes may be delegated to staff. Alternatively, the board’s delegation may authorize the board to sign a cover sheet containing a list of envelopes that were acted upon during the meeting and indicating whether those envelopes were approved or disapproved in lieu of signing the individual envelopes. The delegation may also apply to review and approval of one-stop absentee applications.

Scanning Absentee Ballots at Absentee Board Meetings

It is important to distinguish between *scanning* and *tabulating* approved ballots, because the law permits each task to occur at different times. “Scanning” is a preparatory step that occurs when the approved absentee ballots are opened, removed from the envelope, and inserted into the tabulator. The tabulator reads the ballots but does not print the totals at that time, and no election returns are released. “Tabulating” or “counting” occurs on Election Day and involves closing the polls on a tabulator and printing tabulated results from ballots that have been previously scanned.

A county board of elections may, by majority vote, decide to scan absentee ballots during each absentee meeting.²² **If a county board anticipates a large volume of absentee ballots, it is strongly recommended that the board authorize the scanning of approved ballots during absentee board meetings instead of waiting until Election Day.**

The scanning cannot begin until a majority of the board members and at least one board member of each political party is in attendance. If a board member of each political party is not available, the chair or other member of the executive committee of the county political party of the absent member must be present. The political party representative shall act as an official witness to the scanning and shall sign the absentee ballot abstract as an “observer.”²³

Staff may enter the approved ballots into the tabulator, but each board member present is responsible for and must observe and supervise the opening of the envelopes and scanning of the

²² G.S. § 163-234(3).

²³ G.S. § 163-234(9).

ballots.²⁴ **It is not permissible for approved ballot envelopes to be opened, for ballots to be removed from the envelope, or for ballots to be inserted into the tabulator outside of a board meeting. These tasks cannot be delegated to staff to complete outside of a board meeting.**

If the board chooses to scan approved ballots during absentee meetings, it should consider ways to make the process as efficient and streamlined as possible. For example, the board could approve staff-recommended ballots first, then direct the staff to open those envelopes and enter the ballots into the tabulator while the board reviews the envelopes that require further consideration and those that staff have recommended be disapproved.

Scanning of ballots must be performed during a board meeting, and if scanning occurs before Election Day, ballots must be scanned at the same meeting during which they were approved.²⁵ The number of approved absentee ballots must be reconciled with the number of ballots inserted into the tabulator. Reconciliation should be completed at each board meeting. If it is not possible to scan all approved ballots at that meeting, the board may recess the scanning to a time and date certain, which could be the next absentee board meeting. The county board should send out the notice as soon as possible but it is not required to be sent 48 hours in advance of the reconvened meeting. Ballots should be processed in groups, so that ballots from all opened ballot envelopes are processed in the same meeting.

Election Day Meeting

County boards are strongly encouraged to begin counting ballots at 2 p.m. rather than 5 p.m. on Election Day to avoid a delay in absentee results being released on election night.²⁶ County boards may begin counting UOCAVA ballots beginning at 9 a.m. on Election Day.

To begin counting ballots prior to 5 p.m., a county board must adopt a resolution at least two weeks prior to the election stating the hour and place of the counting of absentee ballots. The resolution also may provide for an additional meeting following the day of the election and prior to the day of canvass to count absentee ballots received pursuant to G.S. 163-231(b)(ii) or (iii) as provided in subdivision (11) of G.S. § 163-234. A copy of the resolutions shall be published

²⁴ G.S. § 163-234(5).

²⁵ G.S. § 163-234(3): “Notwithstanding the provisions of subdivision (2) of this section, a county board of elections may, at each meeting at which it approves absentee ballot applications pursuant to G.S. 163-230.1(c) and (c1), remove those ballots from their envelopes and have them read by an optical scanning machine, without printing the totals on the scanner.” (Emphasis added).

²⁶ G.S. § 163-234(2).

once a week for two weeks prior to the election, in a newspaper having general circulation in the county. Notice may additionally be made on a radio or television station or both, but such notice shall be in addition to the newspaper and other required notice.

At its meeting on Election Day, county boards must count all absentee ballots that have come in prior to 5 p.m. on the day before Election Day. **No absentee ballot counting results may be released until after the polls close.**

Ballot Duplication

UOCAVA ballots and ballots that have been damaged or otherwise cannot be read by the tabulator must be duplicated in order to be scanned by the machine and to avoid having to manually enter the voter's selections into the reporting software. County boards may adopt a policy to authorize a bipartisan team of staff members or poll workers to duplicate ballots outside of an absentee board meeting. The policy must include the following:

- Each bipartisan duplication team must consist of at least three staff members, with no more than two members being of the same political affiliation. It is a best practice to have at least four members, two of each political party, to ensure accuracy.
- The director must supervise and train all members of the duplication team and assign the following roles:
 - Ballot Caller – Announces the voter's selections listed on the original ballot to the Ballot Duplicator and Ballot Reviewer.
 - Ballot Duplicator – Replicates the voter's selections from the original ballot onto the machine-readable ballot as instructed by the Ballot Caller.
 - Ballot Reviewer – Reviews the Ballot Caller's readings from the original ballot and compares it to the selections recorded on the machine-readable ballot by the Ballot Duplicator to ensure accuracy. It is a best practice to have two ballot reviewers, one who will review the selection announced by the Ballot Caller and one who will review the selection made by the Ballot Duplicator.
- Prior to the start of the ballot duplication process, each member of the bipartisan duplication team must complete a participation log noting the date, time, and their name, role, and party affiliation.
- During the ballot duplication process, the duplication team is not permitted to leave each other's immediate presence until the process has been completed, unless authorized by the director.
- All duplicated ballots must contain the following in the blank box at the top of each ballot:
 - A notation (for example, "DUP") to indicate the ballot is a duplicate of the original.
 - The ballot number assigned to the voter.
 - The precinct of the voter.

- Upon completion of the process, the team must do the following:
 - Ensure that the duplicated ballots are attached to the corresponding original ballots for the Board to verify at its next scheduled meeting.
 - Enter the time of completion and their signatures to the ballot duplication log.
 - Provide the completed duplication log and the ballots to the director.
- The director must ensure that the ballots are kept in a secured container until the next absentee board meeting.
- The board must review each duplicated ballot at its next scheduled board meeting prior to approval of the ballots.

It is a best practice to have a duplication team present at every meeting to duplicate any damaged ballots that are identified during the board meeting. Duplicating ballots at the board meeting when the ballot envelope was approved reduces the likelihood of mistakes.

Control of Board Meeting

The county board of elections is responsible for maintaining control at its absentee board meetings. The county board must ensure that the public receives proper notice of the board meeting and is given the opportunity to attend. However, because state law vests members of the county board with the duty to approve absentee ballots and the board’s decision is final, the county board should not permit public comment while absentee envelopes and the accompanying photo ID documentation are being adjudicated, or while ballots are being duplicated, sorted, or tabulated. The board also should not permit questions from the public as the board approves absentee envelopes and photo ID documentation, to avoid disruption of proceedings which must be carefully managed, the potential for outside influence of the board’s decisions, and the potential for nonuniform review of ballots. G.S. 163-234 is very clear that others shall be permitted to attend the meeting during which absentee ballots are counted and observe the process, but may not interfere with the election officials in the discharge of their duties.²⁷

It is recommended that the board chair explain the process at the beginning of the board meeting and state that public comment is not permitted during the approval and scanning of absentee ballots. The board may, but is not required to, designate a separate part of the meeting for public comment.

At the end of each board meeting, the goal is total reconciliation of all envelopes, photo ID documentation, and ballots. To do that requires careful control of every document in the room. It

²⁷ G.S. § 163-234(2): “Any elector of the county shall be permitted to attend the meeting and allowed to observe the counting process, provided the elector shall not in any manner interfere with the election officials in the discharge of their duties.”

also requires ensuring that the board members focus on the task at hand and that the public remains in an observer rather than a participant role. Envelopes, photo ID documentation, and ballots must not be allowed to be removed from assigned areas. A voter's photo ID documentation must also be retained with the voter's corresponding envelope. The reconciliation process shall ensure the number of ballot envelopes in each stack is tracked, and that the number of envelopes approved at the meeting is equal the number of ballots entered into the tabulator. The county board shall record the count on the tabulator at the start and end of each absentee meeting. A sample reconciliation log that you may use for process is available [here](#).

Public Records Requests for Envelopes

Some county boards may have received public records requests for absentee ballot return envelopes. Ballot return envelopes are public records under North Carolina's Public Records Act, with exceptions for voter signatures and CIV number.²⁸ Public records requests should not be fulfilled during a board meeting, but must be fulfilled as promptly as possible. Photo ID photocopies and Photo ID Exception Forms are technically separate documents from absentee ballot envelopes, so each are addressed separately below, even though these are retained with the envelopes. Photo ID photocopies are confidential and should never be provided, and Photo ID Exception Forms may need to be redacted due to confidential information included on the forms.²⁹

Providing Copies of Envelopes

Prior to providing a copy of the envelope to the requestor, the voter signature and CIV number must be redacted, as the number links the envelope to a particular voter's ballot. Witness or assistant information may not be redacted.

To redact the voter signature and CIV number, you may copy the envelope, mark through the confidential information on the copy, and then copy it again. Some counties have used removable tape or a cardboard or other thick paper cutout to cover the confidential information when making a copy. Digital copies may also be provided using a template redaction tool in a PDF editing program like Adobe.

Viewing Envelopes

Unredacted envelopes may be viewed by the public in your office, though no copy, photo, or tracing may be made. A county board must ensure that the requestor is monitored while

²⁸ G.S. §§ 132-1.2(4), 163-82.10(a), 163-165.1(e). See also [Numbered Memo 2016-25](#) and [Numbered Memo 2022-01](#).

²⁹ G.S. § 163-82.10(a1), 163-233(a).

reviewing the envelopes in the office to ensure the voter's signature is not retained. Absentee ballot return envelopes contain an identifier that is linked to the ballot, so this identifier must also be redacted from public view to protect the secrecy of the ballot.

Photo ID Documentation

Photo ID documentation must be retained with the envelope because it is reviewed as part of the absentee application. For this reason, the photocopy of photo ID or Photo ID Exception Form must be retained for as long as the county retains that voter's corresponding absentee envelope.³⁰

As noted above, the photocopy of a voter's photo ID is *not* a public record, and therefore a county board should not provide a copy of the photocopy of photo ID or allow viewing of the photocopy of photo ID in response to a public records request. The photocopy of photo ID must be retained with the voter's corresponding envelope through at least the end of canvass and the certification of all elections in the county. After that time, for efficiency in responding to public records requests and to reduce the likelihood of a mistaken disclosure, a county board can separate the photocopy of photo ID from the corresponding envelopes and securely store them in a separate container—so long as the photocopies of photo ID are still stored in the same secure location as the envelopes.

Unlike the photocopy of photo ID, a Photo ID Exception Form is a public record. If a public records request seeks copies or viewing of Photo ID Exception Forms, the county board will need to redact any confidential information from the Form before allowing the requestor to view the form or receive a copy.

Finally, if allowing a requestor to review an envelope in person and the photo ID documentation has not been separated from the envelope, a county board should first separate the photocopies of photo ID from their respective envelopes and redact confidential information on Photo ID Exception Forms before allowing the public to review the envelopes.

³⁰ This period is at least 22 months for primaries and elections involving a contest for federal office, 52 U.S.C. § 20701, and at least one year for primaries and elections not involving a contest for federal office, G.S. § 163-233(c).