



★ VIRGINIA ★
DEPARTMENT *of* ELECTIONS

the Handbook

Chapter 18

Satellite Offices

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18. SATELLITE OFFICES

REQUIRED FORMS Satellite Early Voting Checklist	ADDITIONAL RESOURCES Virginia Constitution Art. II Sec. 7 Code of Virginia §24.2-129 Code of Virginia §24.2-701.2 Locality Charter Provisions
REFERENCE Virginia Office of Attorney General Opinion 21-040 Standards for Absentee Ballot Drop Off Locations	REGULATIONS 1VAC20-70-60 Security requirements for absentee satellite offices

18.1 IN GENERAL

“The governing body of any county or city may establish, by ordinance, voter satellite offices to be used in the locality for absentee voting in person. The governing body may establish as many offices as it deems necessary. No change in, including the creation or abolishment of any voter satellite office shall be enacted within 60 days next preceding any general election. Notice shall be published prior to enactment in a newspaper having general circulation in the locality once a week for two successive weeks.”¹

As absentee voting increases in popularity, localities may wish to open satellite offices to use for absentee voting in person. The decision whether to open a satellite office or multiple satellite offices should be made by your locality in consultation with both the general registrar and members of the electoral board. Here are some factors to consider when determining whether to have voter satellite offices for in person absentee voting:

- Can your general registrar’s office alone handle the expected volume of in person absentee voting?
- Would opening a satellite office or offices ease the burden on your registrar’s office?
- Are there public buildings in your locality that are ADA compliant and could be used as satellite offices?

If your locality desires to open one or more satellite offices, here are some additional factors to consider:

- Are you placing satellite offices in high population areas to guarantee maximum value?
- If you have multiple offices, are they in distinct geographical areas within your locality to serve all local communities?
- Do you have adequate staff and volunteers to run the number of satellite offices that you wish to open?

¹ See [§24.2-701.2](#).



- Do you have the additional resources required to operate these locations, including voting machines, physical space (for example parking), ballots of every ballot style, and an adequate internet and cyber-security infrastructure?

18.2 ESTABLISHING A SATELLITE OFFICE

As noted above, satellite offices must be established by local ordinance. Your local governing body has its own process for establishing ordinances, and the process for establishing satellite offices should be the same as the process for establishing a polling place location. If you are unsure of your local process, you may wish to contact your city or county attorney's office for further information.

18.3 REQUIREMENTS

Voter satellite offices for in-person absentee voting must meet the following requirements:²

- Must be in a public building owned or leased by the county, city, or town (or may be in a facility owned or leased by the Commonwealth and used as a DMV).
 - Must have adequate facilities for the protection of all elections materials produced in the process of absentee voting in person, the voted and unvoted absentee ballots, and any voting systems in use at the location.
 - Must be accessible to qualified voters and in compliance with the Virginians with Disabilities Act, the Voting Accessibility for the Elderly and Handicapped Act, and the Americans with Disabilities Act.
- The governing body of each county, city, and/or town shall provide funds to enable the general registrar to provide adequate facilities at each satellite office for the conduct of elections.
- Statutory requirements applicable to polling places also apply to satellite offices. Therefore, campaigning is prohibited within 40 feet of the entrance and carrying of a firearm is prohibited within 100 feet of the entrance.³

18.4 NOTICE

Prior to enacting a new satellite office, consolidating, relocating, or changing an existing location, notice shall be provided in a newspaper having general circulation in the locality once a week for two successive weeks.⁴ Notice must also be mailed to all registered voters regarding any change to the voter satellite office at least 30 days prior to the next primary, general, or special election.⁵

Not later than 55 days prior to any election, the general registrar shall post notice of all satellite offices and the dates and hours of operation of each location in the office of the general

² See [§24.2-701.2](#).

³ See [§24.2-701.1\(B\)](#). See also 2021 Op. Va. Att'y Gen. 40 ([September 1, 2021](#)).

⁴ See [§24.2-701.2](#).

⁵ See [§24.2-306](#) and See also 2021 Op. Va. Att'y Gen. 40 ([September 1, 2021](#)).



registrar and on the official website for the county or city; this notice shall remain for the duration of the absentee voting period.⁶

ELECT also posts the availability of satellite offices (locations, dates, and hours, by locality) on the state’s website. To that end, the general registrar (or their designee) must accurately complete ELECT’s Satellite and Dropbox survey prior to each election specifying the early voting options that will be made available to the locality’s voters for that election. ELECT must also be notified of any changes to this information.

If the voter satellite office has moved, notice will have to be posted, if practicable, at the old location telling voters about the move and how they can find information to find the new polling place.⁷ The notice must be posted for the first primary and general election that the new satellite polling location is in use.

18.5 RELOCATION, CONSOLIDATION, AND CLOSURE

Localities may have to move or close satellite offices to suit the needs of their voters. This section covers the requirements for making changes to satellite offices.



Law Note

Pursuant to [§24.2-101](#), ““Polling place” means the structure that contains the one place provided for each precinct at which the qualified voters who are residents of the precinct may vote.” In [Opinion 21-040](#) from 2021, the Virginia Office of the Attorney General stated that this definition applies to satellite offices for absentee voting. Therefore, polling place regulations and requirements also apply to satellite offices, such as the “preclearance” process for covered practices, pursuant to [§24.2-129](#).



Because a satellite office is a polling place, establishing, changing, or abolishing a satellite office cannot be done within 60 days of a general election, pursuant to both [§24.2-306](#) and [§24.2-701.2\(A\)](#).

Since a satellite office is treated as a polling place under Virginia Law, the closure, relocation, or consolidation of any voter satellite office is considered a covered practice and subject to preclearance. Pursuant to [§24.2-129](#), there are certain actions that are considered “covered practices”; these covered practices include, “Any change that reduces the number of or consolidates or relocates polling places in the locality, except where permitted by law in the event of an emergency.”⁸ As such, these changes must go through the “preclearance” process as

⁶ See [§24.2-701.2](#).

⁷ See [§24.2-306](#).

⁸ See [§24.2-129](#).



described in the statute.⁹ The local governing body is responsible for establishing and relocating polling places, including satellite offices; this must be done by passing an ordinance.¹⁰

To enact a covered practice, the **governing body** of a locality must adhere to the following:¹¹

- The governing body will provide notice to the public at least 45 days in advance of the last date prescribed in the notice for public comment.
- Public comment must be accepted for a period of no fewer than 30 days.
- The governing body must conduct at least one public hearing during the public comment period.
- Wait an additional 30 days following the public comment period before the proposed change becomes effective.



Example Timeline of Preclearance Via Public Comment

If a locality intends to move a polling place before the June Primary, the process will take several weeks. If public comment will be taken from the 1st of March until the 30th of March, the governing body will need to provide public notice of the public comment period no later than 45 days before the end of the public comment period of March 30th. This would require the notice to be sent out by the governing body sometime around mid-February. The governing body will also need to have a public hearing sometime in March during the public comment period. Once March 30th passes, the governing body must wait 30 days before enacting the change, April 29. As a note, the 60-day prohibition on moving a polling place applies to general elections, specifically. Otherwise, the locality should at least be cautious moving polling places too close to a primary.

In lieu of a public comment period, the governing body can request to receive a certification of no objection (CNO) from the Office of the Attorney General.¹² The certificate of no objection indicates the covered practice does not have the purpose or effect of denying or abridging the right to vote based on race, color, or membership in a language minority group. See GREB Handbook Chapter 3 for more detailed information on polling places.

18.6 EMERGENCY CHANGES

If an office becomes unusable due to an emergency, the electoral board or general registrar shall provide an alternative location subject to State Board approval.¹³ The registrar will provide notice to voters appropriate to the circumstances of the emergency. Generally, this means providing as much notice as possible given the proximity of the emergency to an upcoming election.

⁹ *Id.* See also 2021 Op. Va. Att'y Gen. 40 ([September 1, 2021](#)) (regarding definition of polling place applying to satellite offices).

¹⁰ *Id.*

¹¹ See §24.2-129.

¹² *Id.*

¹³ *Id.*



18.7 HOURS OF OPERATION

Localities may choose the hours that their satellite offices operate, so long as appropriate notice is given of the times and dates¹⁴ pursuant to section 18.4 of this chapter of the handbook. However, satellite offices are **required** to be open to the public (i) a minimum of eight hours between the hours of 8:00 a.m. and 5:00 p.m. on the first and second Saturday immediately preceding an election (and remain open until 5:00 p.m. on the last Saturday immediately preceding the election); and (ii) a minimum of five hours between the hours of 11:00 a.m. and 5:00 p.m. on the second and third Sunday immediately preceding all elections. The electoral board or general registrar may provide for absentee voting in person in such offices on additional weekend dates, if desired.¹⁵ Localities should operate their satellite offices in ways that are fair to all members of their community, guaranteeing absentee voting access for all voters in the locality.

18.8 CYBERSECURITY EXPECTATIONS

Because voter satellite offices essentially serve as early polling places, there must be measures in place to guarantee the cybersecurity of each satellite office. The State Board of Elections, through the Department of Elections, has promulgated a cybersecurity readiness checklist.¹⁶ Localities will need to complete this checklist and meet all relevant deadlines before the Department of Elections will allow a satellite office to have VERIS and e-pollbook connectivity.¹⁷ If you are considering opening satellite offices, please complete a readiness checklist for each satellite office that your locality is establishing.¹⁸

¹⁴ *Id.*

¹⁵ See [§24.2-701.1](#).

¹⁶ See ELECT, [Satellite Early Voting Readiness Checklist](#).

¹⁷ See Virginia Admin. Code [1VAC20-70-60](#).

¹⁸ *Id.* See ELECT, [Satellite Early Voting Readiness Checklist](#).



APPENDIX A: Commonwealth of Virginia Early Voting Satellite Location Guidelines

The purpose of this document is to establish uniform satellite location guidelines for Early Voting in the Commonwealth of Virginia. These guidelines are provided to address the various components and processes involved in the administration of elections.

Overview of Satellite Location

A satellite location(s) is a large polling location provided to have easier access for voters during the Early Voting period, 45 days before the election. A satellite location(s) will include tables and chairs set up just like a precinct polling location, except that all ballot styles must be provided and available to serve voters from across the locality. Additionally, all voting equipment must be set up like CAP to accept all ballot styles.

Outdoor and indoor signage will be very important to provide voters with clear directions on where to enter, check-in, vote, and exit.

General registrars should plan to have extra personnel available to serve as runners to travel to and from their office as needed.

Consider the following components when selecting a satellite location:

1. Traffic flow
 - a. Easy entrance and easy exit
 - b. Evaluate/review need for traffic control.
2. Parking area
 - Estimate how many voters are anticipated per hour at the height of voting (10-12 days before the election); look at your past absentee ballot numbers to make the estimate.
 - a. Plan for one voter per car to determine how many parking spaces may be needed.
 - b. Consider other area businesses/offices in the same facility and their parking needs during the same hours as the satellite location.
 - c. Consider the following peak hours for voting:
 - i. From 7 am to 9 am
 - ii. From noon to 1 pm
 - iii. From 4 pm to 5pm
 - Consider if public transit (i.e. buses, trains) is available and the closest public transit stop nearest the satellite location.
3. Visibility
 - a. Location is easily visible from the road.
 - b. Signage can be posted in areas to help direct voters.
 - c. The location is in a secure area.



4. Cost

- a. Monthly and/or bi-monthly lease(s) are available.
- b. Utilities included in the rent/lease price.
- c. Government and/or public property

5. Facilities

- a. Public restrooms are available.
- b. Ramps are provided for wheelchair access.
- Doors meet the HAVA-required width and have mechanical switches to open for access.
- c. Heating and air conditioning in the facility
- d. Large room area(s) / tables and chairs available / multiple electrical outlets

6. Communication

- a. Access to telephone service, if possible
- b. Access to internet access through VPN service

7. Accessibility

Does the location fulfill all the requirements for the ADA, VDA, §24.2-701.2, and other required accessibility law requirements?



APPENDIX B: Commonwealth of Virginia Off-Site Satellite Early Voting Locations Contingency Plan

The purpose of this document is to confirm that each locality may open satellite locations during the Early Voting period prior to Election Day, beginning in November 2020.

Note: If an emergency does occur at a satellite office, please contact and inform the Department of Elections by reaching out to your ERS Liaison.

Loss of Connectivity to State VERIS for Voter Check-in Contingency Plan:

Issue: The loss of connectivity to State VERIS impacts the ability to promptly update voter history, leading to potential multiple voting instances at different early voting sites on the same day.

To address this issue, the following steps must be taken:

- a. Maintain Updated Backup Data:
 - Keep an up-to-date backup data file of all eligible voters on laptops.
 - Update this backup data file on a nightly basis throughout the early voting period.
- b. Provision of Visual Precinct Boundary Maps:
 - If laptops become unusable due to the connectivity loss, distribute visual precinct boundary maps to all locations.
 - These maps will aid in accurately determining the correct ballot style for each voter.
- c. Usage of Provisional Ballot Envelopes:
 - When checking in voters using the backup data file, direct them to use provisional ballot envelopes.
 - Voters will seal their voted ballots in these envelopes, and poll workers will complete essential information on each envelope.
- d. Post-Connectivity Restoration Actions:
 - Once connectivity is reestablished, poll workers will update the voter history in VERIS.

Loss of Electricity in Any Early Voting Location Contingency Plan:

Issue: In the event of power loss, this may result in the inability to check-in voters

To address this issue, the following steps must be taken:

- a. All early voting locations will be equipped with fully charged portable battery packs. These packs will serve to recharge laptops and EPB devices. Additionally, if necessary, these battery packs can be utilized to charge cell phones for poll workers.



- b. Should the battery backup on the voting equipment also fail, an alternative approach will be implemented. Ballots will be placed in the auxiliary bin for scanning once power is restored.

Parking and Traffic Flow Concerns Contingency Plan:

Issue: Not enough parking, traffic is backing up, etc.

To address this issue, the following steps must be taken:

- Notify area police and sheriff department officials of peak early voting ~~days~~. Request traffic control assistance, including potential redirecting of traffic flow during peak voting times.
- Work with nearby businesses/office complexes to utilize available parking during peak times.

Long Lines for Voter Check-in Contingency Plan:

Issue: More voters than expected at satellite office.

To address this issue, the following steps must be taken:

- Monitor timing and flow of voters to inform voters in line of approximate wait period. Stage a poll worker to “walk the line” and inform voters of the wait time and other options available to them.
- Stay in touch with other early voting locations to monitor number of voters in line. Redirect voters to other sites that are experiencing shorter lines.

Shortage of Ballots Contingency Plan:

Issue: Not enough ballots at the satellite office.

To address this issue, the following steps must be taken:

- Develop a ballot tracking method that provides advance notice of upcoming ballot shortages for certain ballot styles.
- Designate “ballot runners” to retrieve additional ballots PRIOR to running out.
- If using a Ballot on Demand printer, have a backup printer or supply of ballots for all precincts available in the event of printer breakdowns.

Shortage of Workers Contingency Plan:

Issue: Not enough officers of election at satellite office.

To address this issue, the following steps must be taken:

- Designate and train backup poll workers to assist during absences and/or peak voting time periods.
- Reallocate staff from locations with lower voter turnout to the high turnout locations.
- Train all full-time staff; utilize the full-time staff when there are no other options.

