



★ VIRGINIA ★  
DEPARTMENT *of* ELECTIONS

## Ballot on Demand Systems

Rev 8/2023

Ballot on demand systems (BOD) or printers are self-contained systems that allow election officials or general registrar staff to print ballots on an as needed basis. After the officer of election or general registrar staff has confirmed the voter's identity and checked in the voter through the electronic pollbook (EPB), the BOD printer will print the ballot associated to the voter's residence address. This is one of the solutions localities can provide to deliver precinct specific ballots to all voters at the general registrar's office or voter satellite site. Ballot on Demand printers are considered voting systems under Virginia code.<sup>1</sup> Virginia requires Ballot on Demand Printers to be certified; certification standards may be reviewed [here](#).<sup>2</sup>

### Requirements for localities using Ballot on Demand Printers during Early Voting

Virginia Code Sections §§24.2-616 – 24.2-621 require localities to treat ballot printing with purpose, security, and with a delineated chain of custody. This guidance outlines measures to aid localities in maintaining compliance with §§ 24.2-616-24.2-621, while using BOD systems or printers and discusses printer oaths, chain of custody requirements, as well as record retention requirements.<sup>3</sup>

### PRINTER OATHS

Two oaths will need to be administered **daily** for the printing of ballots on demand: one per [§ 24.2-616](#), which requires the printer to sign a statement before printing begins and one per [§ 24.2-617](#) that requires that the designated representative, selected by the general registrar or electoral board, will oversee the printing process from beginning until the end. Both signed statements are subject to felony penalties pursuant to [§24.2-1016](#). The printing of the official ballot artwork files containing the electoral board's seal eliminates the need for the officers to sign a seal statement per [§ 24.2-619](#).

### Follow these Steps Daily:

- Swear in your Central Absentee Precinct (CAP) early voting officers of election or general registrar staff<sup>4</sup> each day before voting commences using the attached *Officer of Election or General Registrar Staff Ballot on Demand Oaths* by designating:
  - An officer of election(s)/staff as the printer and have them fill out the [§24.2-616](#) form. *Note:* This may include one or more officer of election/staff; and,

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<sup>1</sup> Code of Virginia, §24.2-101, <https://law.lis.virginia.gov/vacode/title24.2/chapter1/section24.2-101/>

<sup>2</sup> Virginia Department of Elections, Elections Security, [F https://www.elections.virginia.gov/media/election-security/FINAL-Ballot-on-Demand-Standards.pdf](https://www.elections.virginia.gov/media/election-security/FINAL-Ballot-on-Demand-Standards.pdf)

<sup>3</sup> Code of Virginia, Chapter 6, <https://law.lis.virginia.gov/vacode/title24.2/chapter6/> inia Code - Chapter 6. The Election

<sup>4</sup> Code of Virginia, §24.2-701.1(D), <https://law.lis.virginia.gov/vacode/title24.2/chapter7/section24.2-701.1/>

- *One officer of election/staff to be the designated representative per §24.2-617. Note: Unlike §24.2-616, §24.2-617 only allows for one individual to serve in this capacity. The chief, deputy chief, or general registrar staff are the optimal choice for the role. Designate the representative(s) before early voting begins and have the representative(s) sign the 617 statement(s) at the end of the each early voting day. The Section's language does establish one person for this role. However, that does not mean that a replacement designated representative could not be pre-determined in the instance of deploying split shift officers during early voting. Further, an emergency designated representative might also be pre-determined to replace either designated split shift representatives in cases of emergency, nature breaks, or any unexpected human situation. The Section's language is applied when one or a combination of representatives are present during the day's ballot on demand printing.*
- Store printer oaths in a folder or binder and retain for record retention purposes.<sup>5</sup>

## CHAIN OF CUSTODY

Chain of custody is a critical documentation process that ensures a transparent and trustworthy election. Chain of custody provides a historical record of the movement of property (example: voting machines, electronic pollbooks, and ballots) by tracking the details of its custody from the person(s) designated to handle and deliver it to the person who is designated to receive it. Attached to this guidance are sample chain of custody forms that may be used in a locality to track the production and distribution of ballots generated by a BOD printer. A locality may also choose to design their own forms. The following are best practices for either solution:

- Track the number of blank ballot stock purchased prior to the start of early voting and quantities distributed to each voter satellite office. Ensure reconciliation of stock distributed, used, and returned at the end of early voting matches.
- Track the total number of ballots printed and voided each day at each early voting site. Corroborate daily quantities of ballots printed through the reports available in the electronic pollbook software. Save the reports by early voting site(s) daily.
- Daily reconciliation forms tracking void, spoiled, or provisional ballots from each early voting site should be collected and return to the registrar's office with the ballots cast in *Envelopes 3 and 4*. The EPB reports and daily reconciliation forms will satisfy the Code's requirements for § [24.2-618](#).
- At least two officers or GR staff should sign the ballot reconciliation form and, if used, the printed EPB report. If reconciliation numbers are gathered through a shared software solution that eliminates the need for a paper form, track user names and log in credentials throughout early voting.
- Instruct officers and GR staff on new collection methods to ensure all corroborative documentation is retained and collected in the general registrar's office. Retain all

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<sup>5</sup> Code of Virginia, Chapter 6, [Code of Virgi https://law.lis.virginia.gov/vacode/title24.2/chapter6/](https://law.lis.virginia.gov/vacode/title24.2/chapter6/) nia Code - Chapter 6. The Election

documents for the duration of the retention for the election as specified by the [Library of Virginia's GS-1 Series](#)<sup>6</sup>.

### **Required Documentation:**

- The general registrar or designated general registrar staff may consolidate each early voting day's activity into one report or spreadsheet that will act as the locality's complete statement of ballot on demand ballots printed, void, and, if applicable, used in provisional voting during the entirety of early voting. ELECT is providing Hanover County's Excel BOD summary spreadsheet as an example to mimic. A locality specific spreadsheet is also acceptable as long as it tracks all ballots printed.

Alternatively, the general registrar or designated general registrar staff may review and submit copies of all of the daily reconciliation forms.

For either approach, two general registrar staff members or two members of the electoral board must review and sign an attestation statement to having reviewed and accounted for all print on demand ballots printed and that all ballot officer oaths and designated representative statements were collected. The report\spreadsheet along with the statement will be uploaded through Formsite by no later than **Tuesday, November 14, 2023**.

<https://fs28.formsite.com/vaelect/mhouljgwng/index>

### **RECORD RETENTION**

Printer oaths are considered election materials and should follow the records retention requirements outlined by the Library of Virginia's Archival and Records Management Service Division by retaining these documents for two years after the applicable election.<sup>7</sup>

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<sup>6</sup> Library of Virginia Archival and Records Management Services Division, Record Retention and Disposition Schedule General Schedule No. 1, County and Municipal Governments Voter Registration and Election Records, [https://www.lva.virginia.gov/agencies/records/sched\\_local/GS-01.pdf](https://www.lva.virginia.gov/agencies/records/sched_local/GS-01.pdf)

<sup>7</sup> Library of Virginia Archival and Records Management Services Division, Records Retention and Disposition Schedule General Schedule No. 1 County and Municipal Governments Voter Registration and Election Records, [https://www.lva.virginia.gov/agencies/records/sched\\_local/GS-01.pdf](https://www.lva.virginia.gov/agencies/records/sched_local/GS-01.pdf)

## APPENDIX – A

### GLOSSARY

**Ballot on Demand (BOD) System** – A Virginia certified<sup>8</sup> stand-alone system that prints ballots for each precinct/ballot style within a locality.

**Central Absentee Voter Precinct (CAP)** – A precinct established pursuant to § [24.2-712](#) for the processing of absentee ballots for the county or city or any combination of precincts within the county or city.

**Official Ballot Artwork File(s)** – An electronic file(s) containing the locality’s official ballot(s) including voting equipment timing marks and the electoral board’s official seal on the back of the ballot<sup>9</sup>. The file(s) is\are generated from Virginia certified voting equipment<sup>10</sup> software and approved by the Department of Elections’ in accordance with the State Board of Elections’ August 2022 Ballot Standards<sup>11</sup> prior to each election.

**Officer of Election** – A registered voter in Virginia appointed by the electoral board to serve a polling place for any election. The officer must attend training conducted by the electoral board or the general registrar. Some of their duties on Election Day (Early Voting) include identifying qualified voters and checking them in on the pollbook(s); handing voters their correct ballots; telling voters the proper procedures for inserting ballots into the voting machine; and, when applicable, providing a voter with a provisional ballot.

**Print on Demand Ballot** – A voter’s locality and precinct specific official ballot printed by the Virginia certified Ballot on Demand (BOD) System.

**Voter Satellite Office** - a public building owned or leased by the county, city, or town within the county and may be in a facility that is owned or leased by the Commonwealth and used as a location for Department of Motor Vehicles facilities or as an office of the general registrar. Such location shall be deemed the equivalent of the office of the general registrar. Any such location shall 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.

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<sup>8</sup> Virginia Department of Elections, Election Security, [Ballot on Demand Systems Certification Standards](#)

<sup>9</sup> Code of Virginia, § 24.2-619, <https://law.lis.virginia.gov/vacode/title24.2/chapter6/section24.2-619/>

<sup>10</sup> Virginia Department of Elections, Election Security, <https://www.elections.virginia.gov/media/election-security/FINAL-Ballot-on-Demand-Standards.pdf>

<sup>11</sup> Virginia Department of Elections, Ballot Standards, August 2022, [2022-08-  
https://www.elections.virginia.gov/media/formswarehouse/election-management/ballots/2022-08-SBE-Ballot-Standards-and-Verification-Procedures.pdf](https://www.elections.virginia.gov/media/formswarehouse/election-management/ballots/2022-08-SBE-Ballot-Standards-and-Verification-Procedures.pdf) SBE-Ballot-Standards-and-Verification-Procedures.pdf (virginia.gov)

## APPENDIX - B

### Office of Election Ballot on Demand Oath



★ VIRGINIA ★  
DEPARTMENT of ELECTIONS

COMMONWEALTH OF VIRGINIA  
**OFFICER OF ELECTION**  
**BOD OATH**

Return to the GR  
or GR Staff

COMMONWEALTH OF VIRGINIA  
**OFFICER OF ELECTION**  
**EARLY VOTING BALLOT ON DEMAND OATH**

ELECTION DATE \_\_\_\_\_ COUNTY/CITY OF \_\_\_\_\_

EARLY VOTING DATE \_\_\_\_\_ PRECINCT NAME \_\_\_\_\_



#### OATH OF OFFICER

##### DELEGATED BY THE GENERAL REGISTRAR OR THE SECRETARY OF THE ELECTORAL BOARD TO ADMINISTER OATH TO OTHER OFFICERS

I do solemnly swear (or affirm) that during today's in-person absentee/early voting period I will print ballots for each in-person voter, and that I will void any ballot that is printed and abandoned by the voter, and void any ballot that does not match the voter's actual voting precinct, and that I will confirm the locality seal is printed on the back of each ballot printed, and that I will ensure proper delivery of each print on demand ballot to the correct in-person voter.

\_\_\_\_\_  
SIGNATURE OF DELEGATED OFFICER OF ELECTION

\_\_\_\_\_  
SIGNATURE OF ELECTORAL BOARD MEMBER  
OR REGISTRAR ADMINISTERING OATH

#### OATH OF ALL OTHER BALLOT ON DEMAND OFFICERS OF ELECTION

I do solemnly swear (or affirm) that during today's in-person absentee/early voting period I will print ballots for each in-person voter, and that I will void any ballot that is printed and abandoned by the voter, and void any ballot that does not match the voter's actual voting precinct, and that I will confirm the locality seal is printed on the back of each ballot printed, and that I will ensure proper delivery of each print on demand ballot to the correct in-person voter.

Signatures of Officers of Election:

1. \_\_\_\_\_  
2. \_\_\_\_\_  
3. \_\_\_\_\_  
4. \_\_\_\_\_  
5. \_\_\_\_\_  
6. \_\_\_\_\_  
7. \_\_\_\_\_

8. \_\_\_\_\_  
9. \_\_\_\_\_  
10. \_\_\_\_\_  
11. \_\_\_\_\_  
12. \_\_\_\_\_  
13. \_\_\_\_\_  
14. \_\_\_\_\_

\_\_\_\_\_  
SIGNATURE OF PERSON ADMINISTERING OATH

\_\_\_\_\_  
TITLE OF PERSON ADMINISTERING OATH

\_\_\_\_\_  
DATE ADMINISTERED

## APPENDIX – B (continued)

### General Registrar Staff Ballot on Demand Oath



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DEPARTMENT of ELECTIONS

COMMONWEALTH OF VIRGINIA  
**GENERAL REGISTRAR**  
**STAFF BOD OATH**

[Return to the GR](#)

COMMONWEALTH OF VIRGINIA

#### **GENERAL REGISTRAR STAFF** **EARLY VOTING BALLOT ON DEMAND OATH**

ELECTION DATE \_\_\_\_\_ COUNTY/CITY OF \_\_\_\_\_

EARLY VOTING DATE \_\_\_\_\_ PRECINCT NAME \_\_\_\_\_

#### **GENERAL REGISTRAR STAFF** **DELEGATED BY THE GENERAL REGISTRAR OR THE SECRETARY OF THE ELECTORAL** **BOARD TO ADMINISTER OATH TO OTHER OFFICERS**

I do solemnly swear (or affirm) that during today's in-person absentee/early voting period I will print ballots for each in-person voter, and that I will void any ballot that is printed and abandoned by the voter, and void any ballot that does not match the voter's actual voting precinct, and that I will confirm the locality seal is printed on the back of each ballot printed, and that I will ensure proper delivery of each print on demand ballot to the correct in-person voter.

\_\_\_\_\_  
SIGNATURE OF DELEGATED GENERAL REGISTRAR STAFF

\_\_\_\_\_  
SIGNATURE OF ELECTORAL BOARD MEMBER  
OR REGISTRAR ADMINISTERING OATH

#### **OATH OF ALL OTHER BALLOT ON DEMAND GENERAL REGISTRAR STAFF**

I do solemnly swear (or affirm) that during today's in-person absentee/early voting period I will print ballots for each in-person voter, and that I will void any ballot that is printed and abandoned by the voter, and void any ballot that does not match the voter's actual voting precinct, and that I will confirm the locality seal is printed on the back of each ballot printed, and that I will ensure proper delivery of each print on demand ballot to the correct in-person voter.

Signatures of General Registrar Staff:

1. _____	8. _____
2. _____	9. _____
3. _____	10. _____
4. _____	11. _____
5. _____	12. _____
6. _____	13. _____
7. _____	14. _____

\_\_\_\_\_  
SIGNATURE OF PERSON ADMINISTERING OATH

\_\_\_\_\_  
TITLE OF PERSON ADMINISTERING OATH

\_\_\_\_\_  
DATE ADMINISTERED

## APPENDIX - C

### 617 - Statement of Representative – For use in a locality that **DOES NOT** collect all ballots cast each day

#### STATEMENT OF ELECTORAL BOARD or GENERAL REGISTRAR REPRESENTATIVE OBSERVING BALLOT ON DEMAND PRINTING DURING EARLY VOTING

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#### TO BE COMPLETED AT THE CONCLUSION OF EACH DAY OF EARLY VOTING.

I, \_\_\_\_\_, solemnly swear [or affirm]  
PRINT FULL NAME

that I was continuously present in the room in which the official ballots for the election to be held < **enter election title here** >, were printed from the commencement until the end of the voting at (< **insert time here** >). I witnessed that only (< **enter daily number here** >) ballots were printed and that all abandoned ballots or ballots not matching the registered voter's precinct were voided.

At the end of the day's early voting session, I witnessed that all printed ballots cast by the voter were collected in the secured voting machine(s) and printed void ballots were enclosed in a sealed Envelope #4. I witnessed that all printed ballots are being held in a secure area until the ballots are delivered back to the general registrar.

I understand that knowingly signing a false statement constitutes the crime of perjury.

\_\_\_\_\_  
Signature of Electoral Board/General Registrar Representative

DATE \_\_\_\_\_

Return to the General Registrar or General Registrar Staff

## APPENDIX – D

### 617 - Statement of Representative – For use in a locality that DOES collect all ballots cast each day

#### STATEMENT OF ELECTORAL BOARD or GENERAL REGISTRAR REPRESENTATIVE OBSERVING BALLOT ON DEMAND PRINTING DURING EARLY VOTING

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#### TO BE COMPLETED AT THE CONCLUSION OF EACH DAY OF EARLY VOTING.

I, \_\_\_\_\_, solemnly swear [or affirm]  
PRINT FULL NAME

that I was continuously present in the room in which the official ballots for the election to be held (< **enter election title here** >), were printed from the commencement until the end of the voting at (<**insert time here**>). I witnessed that only (< **enter daily number here** >) ballots were printed and that all abandoned ballots or ballots not matching the registered voter's precinct were voided.

At the end of the day's early voting session, I witnessed that all printed ballots were collected and inserted into Envelope #1A – Provisional Ballots Cast, if needed, Envelope #3 – Counted Ballots, and Envelope #4 – Void or Spoiled Ballots and will ensure delivery of these envelopes to the general registrar.

I understand that knowingly signing a false statement constitutes the crime of perjury.

\_\_\_\_\_  
Signature of Electoral Board/General Registrar Representative

DATE \_\_\_\_\_

Return to the General Registrar or General Registrar Staff



## APPENDIX – E

### Daily Early Voting Reconciliation

Election: < Enter Election Title Here >

Location: EV-1 Office of Elections

Today's Date: \_\_\_\_\_

<b>Part A - ELECTRONIC POLLBOOK</b>			
1	Number checked in at location at open	From EPB	
2	Number checked in at location at close	From EPB	
3	Daily Voters Checked In	Line 2 - 1	
<b>Part B - OVO</b>		<b>Machine 1</b>	<b>Machine 2</b>
4	Public count on voting machine at open	Open	
5	Public count on voting machine at close	Close	
6	Daily Votes Cast on voting machine	Line 5 - 4	
7	Total of Votes Cast on All machines	Add Lines 6	
<b>Part C - VOIDED BALLOTS</b>			
8	Number of ballots voided (abandoned by voter)	Count	
<b>Part D - RECONCILIATION</b>			
9	Total Ballots Issued to voters	Line 7 + 8	
10	Total Voters Checked In	Line 3	
11	Does line 9 equal line 10? If No explain	Yes	No
<b>Part E - SPOILED AND OTHER</b>			
12	Number of ballots spoiled by voter (replaced)	Count	
13	Number of Voter Registration applications	Count	
14	Number of Affirmation of Eligibility forms	Count	
15	Number of Voter ID Forms	Count	
16	Number of ballots issued as provisional*	Count	
17	Number of Voter Statements (goldenrod form)*	Count	
18	Number of mail ballots turned in to vote early*	Count	
19	Number of voted mail ballots in dropbox*	Count	
20	Number of curbside voting	Count	
21	Number of Assistance Forms	Count	
<b>Part F - BALLOT-ON-DEMAND</b>		<b>Open Ct.</b>	<b>Close Ct.</b>
22	Printer Number -		
23	Printer Number -		
24	Printer Number -		
25	Printer Number -		
26	Printer Number -		
27	Total Number of Ballots Printed		
28	Does line 27 equal line 9 + line 12?	Yes	No

**Once reconciled record all numbers in your location reconciliation spreadsheet on the G drive. Items with \* should be returned to office each day via Rover when they pick up AB Mail Ballots. All other forms should be kept at location until close on last day.**

We, the undersigned, certify that the above information is a true representation of today's early voting activities

\_\_\_\_\_  
Officer of Election or GR Staff, Signature

\_\_\_\_\_  
Officer of Election or GR Staff, Signature

# APPENDIX – F

## Sample - Ballot Stock Inventory Sheet

Sample

November 8, 2022 General Election

### Ballot Stock Inventory Sheet

STATUS	Date:	STATUS	Quantity:	EO Intials	Date
Stock ordered	8/15/2022	Stock received	1000	WGN	9/12/2022
Add'l Stock ordered	9/23/2022	Stock received	250	WGN	10/12/2022

TOTAL 1250

Allocated Stock

Locations	EO Intials	Date	Quantity:
Elections Office	WGN	9/23/2022	400
Satellite Site #1	WGN	10/15/2022	250
Satellite Site #2	WGN	10/15/2022	250
			900

Balance 100

Add'l stock ordered 10/12/2022 250

Available stock: Balance 10/12/2022 350

EO Intials	Date	
Elections Office	WGN	10/28/2022 350
Satellite Site #1		0
Satellite Site #2		0

TOTAL 350

Stock Balance 0

Reconciliation  
Total Ballots  
printed

Early Voting	Spoiled	Provisionals
1001	2	12
		1015

ENDING BALANCE EO Intials Date 11/18/2022 235

## APPENDIX – G

### Example of Attestation Statement for Final Early Voting BOD Report

We, the undersigned, certify that a thorough review of all early voting ballot on demand printing has been performed and that all print on demand ballots have been accounted for in the < **Enter Election Title Here** >. We further certify that all ballot on demand printer oaths and designated representative statements were collected and will remain part of the official election records for the duration of the retention period as specified by the Library of Virginia for this election.

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Print Name

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Signature

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Role or Title

---

Date

---

Print Name

---

Signature

---

Role or Title

---

Date

## APPENDIX – H

### CONTACTS

#### State Contact

Virginia Department of Elections

Matthew Abell

Office: (804) 887 – 5016

Cell: (804) 720 – 1743

Email: [matthew.abell@elections.virginia.gov](mailto:matthew.abell@elections.virginia.gov)

#### Local Contact

Loudoun County

Richard “Ricky” Keech

Office: (703) 737 – 8329

Cell: (703) 431 – 7944

Email: [richard.keech@loudoun.gov](mailto:richard.keech@loudoun.gov)

Hanover County

Teresa “Teri” Smithson

Office: (804) 365 – 6080

Email: [tfsmithson@hanovercounty.gov](mailto:tfsmithson@hanovercounty.gov)

## APPENDIX – I

### Frequently Asked Questions

**What if a voter refuses to vote a print-on-demand ballot?** Direct the voter to vote on the ballot marking system or vote on Election Day.

A locality may offer printed ballots as an alternative. However, secure storage of precinct specific ballots must be maintained at all times and the distribution of the correct precinct ballot to the voter must occur. If printed paper stock is used to support print on demand, ballot reconciliation measures must also be followed, tracked, and reported for the entire early voting period.

**How does a locality handle the 616 and 617 statements when it operates split shifts in staffing early voting or a voter satellite office?** Administer the 616 oath to both shifts and have the incoming Chief or Deputy Chief sign his or her own 617 statement.

**Why are there two 617 statements?** Some localities may wish to gather and return all printed and absentee drop off ballots at the end of the night. The language of the two statements is slightly different to accommodate different approaches.

**How many officers of election or general registrar staff are needed to empty ballots out of the voting machine?** The job of emptying a voting machine should never be performed by just one individual. At least two officers of opposing political parties or two general registrar staffers should be tasked with emptying the voting machine.