The Honorable Steve Simon, President, NASS (Minnesota)

The Honorable Michael Adams, Co-Chair, Elections Committee (Kentucky)

The Honorable Gregg Amore, Co-Chair, Elections Committee (Rhode Island)

National Association of Secretaries of State

444 North Capitol Street NW

Suite 401

Washington, DC 20001

[DATE]

Dear President Simon, Secretary Adams, and Secretary Amore,

I write to request the National Association of Secretaries of State (NASS) issue guidance to its member states regarding the March 2025 Executive Order #4248, Preserving and Protecting the Integrity of American Elections, and the likely trajectory of federal election policy as we approach the 2026 primaries.

The Executive Order shows the clear direction of the Trump administration towards the restoration of voter confidence through fully paper-based elections. President Trump has been publicly and repeatedly adamant that federal elections should rely on hand-marked paper ballots printed on secure stock. That expectation is now guiding both executive policy and federal agency alignment efforts.

We recognize that NASS is a trusted resource for Secretaries of State and election directors across the country. In this role, we respectfully ask NASS to begin communicating with its members about what is coming and what they must begin preparing for – time is of the essence in this matter because of the following:

1. No current voting equipment meets the full VVSG 2.0 standards.  
   This includes tabulators, ballot marking devices (BMDs), direct recording electronic (DRE) machines, and electronic poll books. The EO signals that equipment failing to meet these standards is at risk of decertification by September 2025.
2. All election-related technology is under increased national security scrutiny.  
   This includes not only tabulators and voting machines but also voter registration systems, ballot-on-demand printers, e-poll books, election night reporting systems, and any supporting software. The Executive Order builds on EO 13873, which restricts components from adversarial nations—such as China, Russia, Iran, and North Korea—from being included in any critical infrastructure. Vendors have testified that parts of their equipment and software continue to be sourced from such countries.
3. While the EO does not mandate hand-marked paper ballots or hand-counting, the absence of federally certified equipment and national security directives suggest these will be necessary for compliance.  
   Jurisdictions must begin preparing for elections where hand-marked paper ballots and human counting procedures become the operational standard due to the inability to rely on foreign-coded or non-transparent technology, the inability to meet the VVSG 2.0 requirements, and the use of barcodes on ballots, even the hand-marked ballots.

In light of these developments, we urge NASS to advise Secretaries of State to:

* Begin contingency planning for elections conducted entirely with hand-marked paper ballots;
* Prepare for the possibility of public, bipartisan hand-counts prior to certification, especially where equipment is not approved under new federal standards;
* Conduct full inventories and internal audits of all election technology, including backend systems and software, to identify foreign-sourced components or code;
* Initiate contact with vendors regarding product compliance timelines and American-sourced alternatives.

Given your leadership role, we also respectfully request a response from NASS on this matter. It is essential that Secretaries of State are not caught off guard by rapid shifts in federal policy implementation. NASS has the capacity to help members get ahead of this curve and maintain operational continuity while preserving voter trust.

We look forward to your leadership in guiding the states through this period of transition and reaffirming our collective commitment to election integrity.

Respectfully,

[YOUR NAME]