



Department of the Secretary of State

Bureau of Corporations, Elections and Commissions

Shenna Bellows
Secretary of State

Julie L. Flynn
Deputy Secretary of State

December 3, 2025

The Honorable Craig Hickman, Senate Chair
The Honorable Laura Supica, House Chair
Members of the Joint Standing Committee on Veterans and Legal Affairs
100 State House Station
Augusta, ME 04333-0100

Dear Senator Hickman, Representative Supica, and Members of the Joint Standing Committee on Veterans and Legal Affairs,

Pursuant to the requirements of the Resolves of 2025 c. 43 (Resolve, Directing the Secretary of State to Study Providing Access to Absentee Ballots for Municipal Elections to Uniformed Service Voters or Overseas Voters in the Same Manner as Absentee Ballots for Statewide Elections) we are pleased to provide this report on our efforts to make it easier for uniformed service and overseas voters (UOCAVA voters) to receive ballots for local elections held at the same time as state and federal elections.

Our team, including leaders in the Elections Division civil service, met internally multiple times to discuss new ideas of how to provide uniformed service and overseas voters with a more streamlined process for receiving and returning local ballots when local elections are held on the same date as state and federal elections. They also discussed updating the Department's website and UOCAVA absentee ballot retrieval service portal to make it clear that local ballots are issued by the voter's municipality of residence.

Following internal meetings, the Department held multiple discussions with members of the Maine Town and City Clerks Association's Elections Working Group as part of the agenda of our regularly scheduled check-ins.

To enable greater efficiencies for municipalities in issuing paper UOCAVA ballots by municipalities in local elections— as required by Title 30-A §2529 – the new Central Voter Registration System is being designed to make it easier for clerks to see when they have local ballots that need to be issued (because the State has accepted their application and will issue a federal/state ballot). This will be emphasized in the clerks' training when the new CVR is

implemented. In essence, this will be an improved notice system, processing overnight jobs to create a task list for clerks to issue UOCAVA ballots.

Several significant challenges remain regarding the potential digital issuance of local ballots along with state and federal ballots by the Department to UOCAVA voters:

Legal:

- Maine Constitution
 - Article VIII, Part Second, sets forth the Municipal Home Rule authority, whereby municipalities may adopt charters and determine matters that are local in nature except as may be prohibited by federal or state law. Pertinent to this discussion, municipal Home Rule allows each municipality to determine the time and form of their elections (i.e., town meeting or secret ballot), and along with state law on local elections, gives the municipal clerk the authority to conduct these elections. The Department of Secretary of State has no oversight role in local elections including time and date of elections and ballot creation and design.
- Federal law
 - The Uniformed and Overseas Citizens Absentee Voting Act (i.e., UOCAVA) governs issuance of federal election ballots to uniformed service and overseas voters. However, under Maine law, the federal, state and county offices and statewide referenda are combined on the same ballot(s), so Maine provides a consolidated federal/state ballot to UOCAVA Voters.
 - The Military and Overseas Voters Empowerment Act (i.e., MOVE) enacted changes to the UOCAVA effective for the 2010 federal elections, requiring states to develop an electronic method for UOCAVA voters to request their ballots, and if the voters so choose, to have their ballots issued electronically rather than by mail.
 - Because the MOVE Act required states to provide a method for UOCAVA voters to request and be issued ballots electronically, Maine amended Title 21-A to require the Secretary of State to centrally issue state and federal ballots for UOCAVA voters statewide. This required procuring a vendor to create a system for generating all ballot styles for the combined state/federal ballots in a PDF format; provide a secure site for each voter to access and download their correct ballot style, mark it, digitally sign the voter affirmation, and return it; and allow the Elections Division to retrieve that information and create a paper ballot for processing votes in state and federal elections.
- State Election Laws
 - Title 21-A, Maine law on Elections, provides the requirements, authority and responsibilities for conducting elections for federal, state and county candidates and statewide referenda in Maine. The Secretary of State has oversight for the conduct of these elections.
 - Title 21-A does not automatically apply to local elections conducted under municipal charters, or under other state laws such as Title 30-A (for municipal elections) and Title 20-A, Maine Law on Education, which addresses elections for

- members of School Districts (SADs and RSUs), except when there is no charter, or when the charter and those laws are silent on a particular topic.
- Title 30-A, Maine Law on Municipalities and Counties, governs the conduct of secret ballot elections, including nominations and ballot requirements, for municipal offices and referenda. The municipal clerk acts in place of the Secretary of State in conducting local elections, and is responsible for administering federal, state and county elections at the local level as well as their own local elections

Logistical, technological and financial:

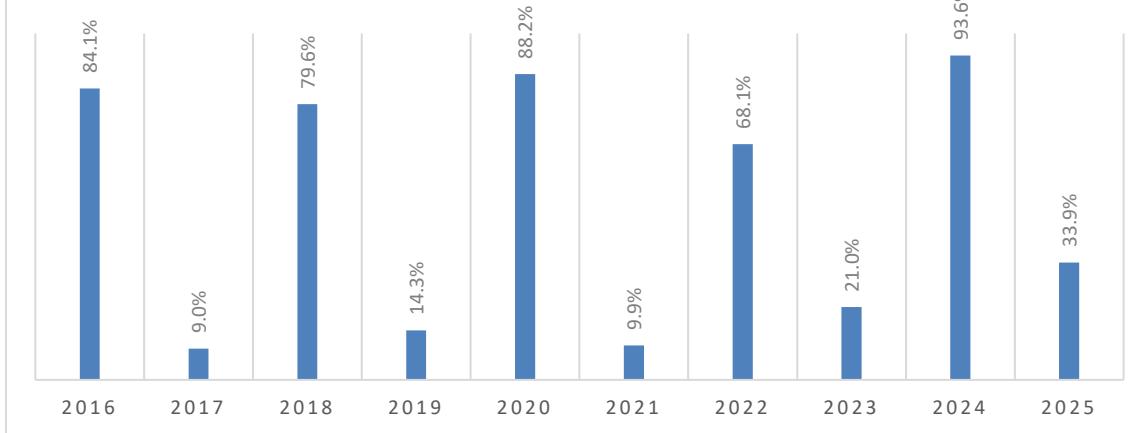
Local elections and ballot layouts are under the direct control of the individual municipality and the Secretary of State has no authority over the administration of these elections, nor any visibility into these elections except when local officials respond to queries from our office. With the federal/state elections conducted under Title 21-A, there is uniformity of ballot content and layout, which has allowed our UOCAVA ballot vendor to create and continue to refine the program that generates the approximately 300 ballot styles for a general election – and twice as many ballot styles in primary election.

Ballot styles in local elections have a wide range of form and content – this is especially true with local referenda content. For example, some municipalities print just the ballot question on a local referenda ballot, while others also include additional paragraphs of text or tabular data such as proposed ordinance language changes or financial statements. Although many cities and towns elect similar offices (City or Town Councilor or Select Board Member, or School Board Member), they may use slightly different terminology. Many municipalities also elect other offices, such as Road Commissioner, Water or Sewer District Board member. This means the digital ballot creation work would be more challenging for the state's vendor than the hundreds of different – but similarly laid out – ballot styles currently generated for the federal/state ballot.

The timeline for ballot creation is different between state/federal elections and local ones. Under Title 30-A and various city and town charters, municipalities have later filing deadlines for candidate and referenda ballot content than for the state elections under Title 21-A. The state ballots are final 70 days before each election, to allow for both printing timelines and UOCAVA ballot creation timelines. Some cities and towns have candidate filing deadlines of 45 days or fewer before the election.

Additionally, municipal clerks raised concerns regarding the effort and cost associated with issuing ballots to all UOCAVA voters, when the number of ballots returned is often quite low. One clerk noted that in a recent election, he issued 87 UOCAVA ballots – at a cost to the town that includes the ballots and envelopes themselves, the postage, and staff time – and only received one ballot back. This is a phenomenon observed in data from state and federal UOCAVA ballot issuance. Return rates in non-presidential election years are much lower than in even-numbered years:

REQUESTED STATE AND FEDERAL BALLOTS THAT WERE RETURNED AND ACCEPTED



The Elections Division is able to issue ballots through noon on the day before Election Day because of the secure electronic system which the Department utilizes for this purpose. If – to account for the legal challenges noted above – every municipality were required to procure a similar system it would be a financially burdensome municipal mandate, and requiring clerks to immediately issue ballots up to Monday at noon (as is required at the state level) would interfere with clerks' ability to physically set up for the election. The physical demands of election preparation have been a major reason that no-excuse absentee voting ends at the close of business the Thursday before an Election Day.

Director Packard and the Elections Division updated the webpage and portal language, as directed in Section 2 of the Resolve, for clarity. The new language is highlighted below.

UOCAVA portal notification:

Dear VOTER'S NAME,

The absentee ballot request submitted by VOTER on DATE APP SUBMITTED has been processed and accepted by the Maine Division of Elections.

Absentee ballots for the November 4, 2025 Referendum Election are processed and delivered every business day. The absentee ballot will be sent via the method you selected on your original request. The State issues only the ballot for the state referendum election. To determine if your municipality is conducting a municipal election on November 4, 2025, contact your Municipal Clerk:

www.maine.gov/sos/elections-voting/find-a-municipal-clerk-or-registrar

If you opted to receive your ballot electronically, you will receive further instructions in a follow up email. This message will be sent from UOCAVA.CEC@maine.gov, so please make sure this email address is added to your safe senders list.

If postal mail was selected, the ballot will be sent to the address below as soon as ballots are available. Date and time of delivery may vary depending on mail service.

If you would like to track the status of your absentee ballot request, please use our online Absentee Ballot Tracker at the link below.

<https://apps.web.maine.gov/cgi-bin/online/AbsenteeBallot/index.pl>

Mail to:
ADDRESS PROVIDED IN ABR REQUEST

Please save this email for your records.

Contact the Elections Division at 1-888-VOTESME or UOCAVA.CEC@maine.gov if the ballot is not received in a timely manner.

Sincerely,

Division of Elections, Maine Secretary of State

Website (<https://www.maine.gov/sos/elections-voting/uniformed-service-and-overseas-voters>):

^ [Request a Ballot](#)

Fill out the [Federal Post Card Application \(PDF\)](#) or use this online [Ballot Request](#) to get a ballot:

- Remember to choose how you want your ballot to be sent to you—either by mail or electronically
- If you choose to get your ballot electronically, you will receive additional instructions after you submit your request

If you are a UOCAVA voter and you have requested an absentee ballot but not yet received it, please contact the Elections Division at 1-888-VOTESME (1-888-868-3763) or UOCAVA.CEC@maine.gov.

NOTE: The State Elections Division issues only the ballot for the state and federal elections. If your municipality has a local election, your municipal clerk will issue that ballot. Ballots for local elections are sent via regular mail and should be requested as soon as feasible to increase the likelihood of timely receipt and return.

Please note that the “municipal clerk” hyperlink on the Uniformed Service and Overseas Voters page goes to this longstanding page: [maine.gov/sos/elections-voting/find-a-municipal-clerk-or-registrar](https://www.maine.gov/sos/elections-voting/find-a-municipal-clerk-or-registrar).

In summary, the Department is improving the communications to UOCAVA voters through our online portal for UOCAVA voters and making improvements to the notification system through implementation of the new central voter registration system to alert municipal clerks to the need to send local ballots to UOCAVA voters. Legal, technological and logistical challenges remain in establishing a fully electronic system for transmittal of electronic local ballots to UOCAVA voters that place that option out of reach at this point in time without significant investments and statutory and constitutional changes. It is our hope however that the communications

improvements will serve the goal of making it easier for our military and overseas voters to get their local ballots in future elections.

If you have any questions about the above report, I would be pleased to attend a meeting of the Committee to answer them.

Sincerely,

A handwritten signature in blue ink that reads "Shenna Bellows". The signature is fluid and cursive, with "Shenna" on the first line and "Bellows" on the second line.

Shenna Bellows
Secretary of State