

December 24, 2025



The Honorable David Livingston, Chairman
Joint Legislative Budget Committee
Arizona House of Representatives
1700 West Washington Street
Phoenix, Arizona 85007

The Honorable David C. Farnsworth, Vice-Chairman
Joint Legislative Budget Committee
Arizona State Senate
1700 West Washington Street
Phoenix, Arizona 85007

Dear Chairman Livingston and Vice-Chairman Farnsworth:

Pursuant to Laws 2025, Chapter 233, Section 83, the Secretary of State's Office (SOS) respectfully requests that the Joint Legislative Budget Committee (JLBC) review at its next meeting the proposal outlined below to transfer \$3,500,000 from the CD7 Special Election line item to the Operating Lump Sum (OLS) in the SOS's FY2026 budget.

Background and Urgency

The Legislature appropriated funding to the CD7 Special Election line item to support costs associated with conducting the congressional vacancy election. Those statutory responsibilities have now been fulfilled, leaving a remaining balance of approximately \$4,400,000 that may be repurposed, subject to JLBC review.

The SOS requests transfer of these monies to the OLS for two purposes:

1. To reimburse counties for their share of FY2026 Arizona Voter Information Database (AVID) payments; and
2. To support the statewide 2026 Election Year Readiness and County Support Funding Plan.

This request is driven by an urgent and well-documented reality: Arizona's election infrastructure is operating in a materially elevated cyber and operational risk environment, and the risks exposed during the 2025 cyber incident cannot be mitigated through existing base funding. That incident—while successfully contained—confirmed what the SOS has

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consistently warned: Arizona's election systems rely on aging, highly customized platforms that are increasingly targeted by sophisticated domestic and foreign actors.

Absent near-term intervention, the SOS cannot responsibly certify that it has the tools, staffing, or defensive posture necessary to manage the 2026 election cycle without an unacceptably high level of risk. **This transfer represents an opportunity for the Legislature to meaningfully reduce that risk.**

It is critical to note, however, that this transfer does not "solve" Arizona's cyber and IT vulnerabilities. Rather, it provides the SOS with the ability to meaningfully *lessen* risk during the 2026 election cycle while longer-term modernization solutions remain unfunded or incomplete.

Below is a detailed description of the twelve components of this \$3,500,000 one-time funding request.

FY2026 County AVID Payments

Reimburse Counties for FY2026 AVID Payments - \$1,000,000

In its FY2026 budget request, the SOS requested \$1,000,000 to reimburse counties for their pro-rated share of operating AVID. As in prior years, the SOS will reimburse counties dollar-for-dollar for these costs. Without reimbursement, counties—particularly rural counties—would be forced to divert scarce local resources from other critical election administration functions, compounding statewide operational risk.

2026 Election Year Readiness and County Support Funding Request

1. Temporary Cybersecurity Monitoring and Active Management — \$650,000

Arizona's election systems are operating in an elevated and demonstrable cyber-risk environment. In 2025, the SOS successfully contained a cyber incident that confirmed long-standing concerns regarding the vulnerability of legacy election applications. In response, the SOS used federal American Rescue Plan Act (ARPA) funds provided by Governor Hobbs to engage an independent, external cybersecurity firm to conduct comprehensive code review, penetration testing, and security assessments of the SOS's most critical election systems.

Initial findings from that independent review identified nearly 100 critical security vulnerabilities and more than 400 high- and medium-risk issues across the SOS's four most essential applications. These findings were not theoretical; they represent real, actionable vulnerabilities that could be exploited during an election cycle. While ARPA funds enabled

the identification of these risks, the remaining ARPA balance is insufficient to remediate or meaningfully mitigate them.

This funding will allow the SOS to deploy continuous, 24/7 cybersecurity monitoring, active threat detection, and rapid incident-response capabilities throughout the 2026 election cycle. Specifically, these funds will support contracted cybersecurity professionals, enterprise-grade monitoring tools, real-time threat intelligence, and active management of known vulnerabilities during periods of heightened risk.

It is critical to emphasize that this funding does not modernize or replace Arizona's election systems. Rather, it provides the SOS with the minimum necessary tools to reduce the likelihood that known vulnerabilities result in preventable failures, service disruptions, or loss of public confidence in 2026. Without this funding, the SOS cannot reasonably assert that it has taken all practicable steps to protect election infrastructure during a period when threats are known, documented, and increasing.

2. EMS/ENR Programming and Resilience — \$300,000

Arizona's Election Management System and Election Night Reporting (EMS/ENR) platform is among the most visible and operationally critical components of the election ecosystem. The system is built on legacy architecture and requires extensive, highly specialized programming prior to each election. Only one individual currently possesses the institutional and technical knowledge necessary to configure the system, creating a documented and unacceptable single point of failure.

The risks associated with this fragility are compounded by the cybersecurity findings described above. A failure of EMS/ENR—whether due to cyber intrusion, system instability, or loss of key personnel—would force the state to revert to manual reporting processes, significantly increasing the likelihood of delays, errors, misinformation, and erosion of public trust during election night.

This funding supports 8–10 weeks of required EMS/ENR programming for the 2026 election cycle, as well as targeted resilience measures, including redundancy testing, system hardening, and contingency planning. These investments are necessary to stabilize the system through the 2026 elections while longer-term replacement efforts remain unfunded or incomplete.

As with cybersecurity funding, this request does not resolve the underlying structural weaknesses of EMS/ENR. It is a stop-gap measure designed to reduce known operational and security risks long enough to administer the 2026 elections responsibly. Without this funding, the SOS would be knowingly entering the next statewide election cycle with a system that is both fragile and inadequately protected.

3. Primary Election Logic and Accuracy (L&A) Testing — \$50,000

Under A.R.S. § 16-449, the SOS is required to conduct Logic and Accuracy testing of every voting system deployed in statewide elections. L&A testing is an integral part of conducting a successful election as it ensures a rigorous evaluation of voting equipment, the viability of technology, and thorough analysis of any discovered discrepancies.

Due to statutory changes shifting the 2026 primary election timeline, these tests now occur in FY2026 and require statewide travel—frequently via DPS aircraft or charter flights—to ensure all 15 counties receive timely certification.

Funding supports personnel, travel, testing equipment, and logistics necessary to meet statutory obligations and verify equipment accuracy before early voting begins.

4. Ballot Measure Initiative Signature Validation — \$100,000

Initiative committees must submit petition signatures to the Secretary of State by July 2, 2026, triggering a statutorily mandated validation process that must be completed within compressed timelines. Signature verification requires a combination of automated validation tools and a trained temporary workforce capable of processing hundreds of thousands of signatures while maintaining strict accuracy and quality-control standards.

Historically, the Secretary of State receives funding for signature validation in odd-numbered fiscal years aligned with election years. However, due to statutory filing deadlines, Initiative signature validation costs are incurred in even-numbered fiscal years, and the SOS's FY2026 budget includes no funding for this non-discretionary responsibility. As a result, the SOS currently lacks the resources necessary to meet statutory timelines.

This funding will support temporary staffing, training, licensing, quality-assurance processes, workspace, and operational infrastructure required to conduct timely and accurate validation. Absent this funding, the SOS faces a substantial risk of delayed certification, increased error rates, and litigation, all of which would undermine election administration and public confidence.

5. Candidate Petition Signature Validation — \$50,000

Candidate petitions are due April 6, 2026, and require rapid, technology-assisted and manual review to determine ballot eligibility. Funding supports temporary reviewers, supervisory oversight, required software, and administrative support needed to complete validation quickly and accurately. Timely validation is essential to ballot preparation and election administration and cannot be absorbed within existing staffing resources. Currently, the SOS's FY2026 budget contains no funding for this purpose.

6. Rural County Vote Tracking and Verification (BallotTrax and Text2Cure) — \$250,000

Rural counties often lack the resources necessary to provide modern voter-facing tools such as ballot tracking and communications about signature curing. These counties disproportionately experience higher ballot-rejection rates and greater administrative burdens.

Funding enables the statewide deployment of BallotTrax and Text2Cure for rural jurisdictions, allowing voters to receive real-time notifications when their ballot is mailed, received, verified, or counted, and to cure signature issues electronically. These tools enhance voter confidence, improve transparency, reduce strain on smaller county election teams, and ensure more ballots are counted and counted quickly.

7. County Elections Tabletop Exercises (TTXs) — \$150,000

The SOS will conduct statewide and regional tabletop exercises (TTXs) designed to strengthen county preparedness for a range of election-related contingencies—including cyberattacks, misinformation events, equipment failures, natural disasters, and other disruptions. The TTXs will guide election officials through the most challenging election scenarios. Participants will rehearse best practices using real-world situations and face tasks that will require them to take appropriate steps to mitigate both passive and active security events.

Consistent with U.S. Election Assistance Commission recommendations, these exercises promote coordination among county officials, law enforcement, IT teams, emergency managers, and SOS personnel. Funding supports scenario development, facilitation, travel, materials, and after-action assessments that help counties refine procedures and improve operational readiness.

8. County Assistance Fund (IT and Election Administration Assistance) — \$100,000

Many counties—particularly rural ones—continue to experience high turnover and lack sufficient internal IT and election administration capacity. This flexible fund allows the SOS to deploy targeted technical support, troubleshoot urgent operational challenges, provide on-site administrative assistance, and field rapid-response teams (“tiger teams”) to stabilize county operations. This support is critical for ensuring uniform statewide compliance with election law and preventing bottlenecks that can delay ballot processing or voter registration updates.

9. Additional County Elections Workers — \$250,000

To support counties with limited staffing, the SOS proposes placing trained election fellows in county recorders and election offices during the 2026 cycle. Additional workers will assist with voter registration processing, early ballot verification, ballot adjudication,

election worker training support, and other essential tasks. This funding covers salaries, training, and deployment expenses. Additional workers will provide significant operational relief during peak workload periods, reduce reliance on overextended permanent staff, and improve accuracy and timeliness in election operations.

10. Physical Security — \$400,000

Threats against the Secretary, other election officials, and election facilities have increased markedly in recent years, with several threats deemed credible by law enforcement. Recent studies by nonpartisan research groups such as Public Service Alliance and Princeton University's Bridging Divides Initiative, have shown that violent threats against public servants, particularly in battleground states, have risen nearly 40-fold in the last decade.

During the 2026 election cycle, personnel will frequently travel statewide and engage in public- and county-facing duties that elevate security risks. Funding will support protective personnel, facility hardening, secure travel protocols, and equipment necessary to ensure the safety of the Secretary, SOS staff, and state property. Without these resources, staff would face unmitigated and unacceptable risks.

11. Voter Registration Database Replacement Planning — \$200,000

Pursuant to State Procurement Office regulations, Arizona's statewide voter registration database (AVID) cannot be extended beyond its 2028 contractual limit. AVID not only houses the names and registration information of every registered voter in Arizona, it is also seamlessly and quickly accessible to voter registration officials and county election offices. Replacing a statewide system of this scale will require multi-year planning, technical scoping, stakeholder engagement, and procurement preparation. Funding will allow the SOS to begin this work in FY2026 by developing system requirements, preparing a Request for Information (RFI), coordinating with counties on functionality needs, and initiating the procurement framework for a 2029 implementation. Without early planning, the state risks a gap in compliance with federal voter registration requirements.

Conclusion

Transferring \$3,500,000 from the CD7 Special Election line item to the OLS will allow the SOS to reimburse counties for FY2026 AVID costs and take essential, time-limited steps to reduce cyber, operational, and security risks ahead of the 2026 elections.

This transfer does not eliminate risk. It does not replace aging systems, permanently solve cybersecurity gaps, or obviate the need for sustained investment. It does, however, materially reduce the likelihood that known vulnerabilities result in preventable failures during a high-turnout, high-threat election cycle.

The SOS views this request as an opportunity for the Legislature to be an active partner in protecting Arizona's elections. Without this action, the SOS will be forced to administer the 2026 elections with risks that have already been identified, documented, and communicated—but not fully mitigated.

The SOS is confident it can expend or encumber these funds within FY2026.

Thank you for your time and consideration of this request. Should you have any questions, please do not hesitate to contact Greg Ensell, Chief Deputy Assistant Secretary of State, at (480) 244-5130 or gensell@azsos.gov.

Sincerely,

A handwritten signature in green ink, appearing to read "Adrian Pontes".

Adrian Pontes

Arizona Secretary of State

cc:

JLBC Members

Richard Stavneak, Director, JLBC

Micaela Andrews, Assistant Director, JLBC

Ben Henderson, Director, OSPB