

**To:** BBHC Subcontracted Providers  
**From:** Julie Lauder, Director of Provider Relations  
**Effective Date:** March 6, 2014 (revised July 1, 2014)  
**Re:** National Voter Registration Act and Florida Voter Registration Act

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The Department of Children and Families (“the Department”) requires BBHC and its subcontracted providers to adhere to specific activities related to the National Voter Registration Act (“NVRA”), the Florida Voter Registration Act (“FVRA”), and the Department’s role as a Voter Registration Agency (“VRA”).

As a Voter Registration Agency (VRA), the Department must provide people with an opportunity at admission or when they change their address, to either register to vote or update their voter registration. Pursuant to Section 97.058(1), Florida Statutes, because the Department contracts with managing entities to administer and manage community behavioral health services, this duty is incumbent on each managing entity.

This will require BBHC require:

- All subcontracts require compliance with the provisions of the NVRA;
- Collect and submit data on these activities to the Department; and
- Provide oversight and ensure implementation the provisions of the NVRA by subcontracted providers.

Attached is Concordia’s procedure (PR-VRA 14-01) that provides direction to BBHC subcontracted providers in adhering to the requirements of the applicable National Voter Registration and Florida Registration laws.

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## National Voter Registration Act Data Collection and Reporting Procedures

**Effective Date:** March 1, 2014

**Responsible Office:** Provider Relations

**Procedure Number:** PR – VRA 14-01

**References:** Section 97.058(6), Section 97.058(2)(d), Florida Statutes;  
Section 97.053(1), Florida Statutes

### I. Roles and Responsibilities

#### A. BBHC

1. Will designate a Voting Registration Activities Coordinator, and notify the Florida departments of State and Children and Families of the Coordinator's name, title, and contact information.
2. Shall ensure each subcontracted agreement for direct services to BBHC clients requires compliance with the National Voter Registration Act (NVRA).
3. Shall require all subcontracted providers that deliver services to clients collect data and submit results on a monthly basis. Reports shall be due by the seventh (7<sup>th</sup>) calendar day of the following month for which services were rendered utilizing the Monthly Voter Registration Services Report (**Exhibit J**).
4. Shall require subcontracted providers utilize **DS-DE77** to comply with the statutory requirements at admission and change of address (<http://election.dos.state.fl.us/NVRA/index.shtml>).
5. Shall submit to the Florida Department of Children and Families (the Department) the Voter Registration Agencies Quarterly Activities Report (**Form DS-DE 131**) which is available at <http://election.dos.state.fl.us/NVRA/index.shtml>. The quarterly schedule is based on the calendar year and shall be submitted as follows:
  - a. First Quarter: due April 10 and submitted to the Department's regional contract manager.
  - b. Second Quarter: due July 10 and submitted to the Department's regional contract manager.
  - c. Third Quarter: due October 10 and submitted to the Department's regional contract manager.
  - d. Fourth Quarter: due January 10 and submitted to the Department's regional contract manager.
6. Shall ensure the delivery of and/or access to training on the requirements of the NVRA.

7. Shall provide the contact information for the Broward County Supervisor of Elections (SOE), applications for completion.
- B. Provider Relations Department
1. Shall ensure the development and implementation of procedures and related forms to ensure subcontracted provider compliance with the NVRA.
  2. Shall ensure each subcontracted agreement requires compliance with applicable federal and State statutes, laws, rules, and regulations.
  3. Shall develop training tools to ensure subcontracted provider staff are able to comply with the requirements of the NVRA. Training shall also be delivered to appropriate internal staff.
  4. Shall ensure monthly data submission and reporting compliance through contract management, and monitoring activities and report to BBHC subcontracted providers who fail to maintain compliance.
  5. Shall prepare the Voter Registration Agencies Quarterly Activities Report (**Form DS-DE 131**) and forward to the BBHC Program Contract Manager prior to the deadlines detailed in Section I.A.5.a-d.
- C. Subcontracted Providers
1. Shall ensure all staff providing direct services to BBHC clients or responsible for data reporting and/or submission successfully complete BBHC NVRA training.
  2. Shall ensure policies, procedures, tools, and instruments are developed and implemented to ensure BBHC clients are afforded the opportunity to register to vote and the opportunity to update his/her voter registration address.
  3. Shall require all staff providing direct services to BBHC clients ask the client at admission if he/she is interested in registering to vote. Pursuant to section 97.058(2)(d), Florida Statutes, the forms to be distributed shall specifically advise the client: "If you would like help in filling out the voter registration application, we will help you. The decision whether to seek or accept help is yours. You may fill out the voter registration application in private." Clients shall also be provided with the contact information for the Broward County Office of the Supervisor of Elections (SOE).
  4. Shall require all staff providing direct services to BBHC clients ask any client who has changed his/her address whether he/she is interested in updating his/her voter registration information. Clients who accept shall be provided with the contact information for the Broward County SOE.

5. Shall provide assistance to any client who requests it in contacting the SOE, completing the paperwork, or submitting the paperwork.
6. Shall accept voter registration applications, changes in registration, and requests for a replacement voter information card. This does not limit the subcontracted provider's opportunity to direct the client to the Broward County SOE and/or provide information as to where the forms may be sent or submitted.
7. Shall forward within five (5) days after receipt from the client to the Broward County SOE.
8. Shall collect the following data and report by the 7<sup>th</sup> calendar day of the following month for which services were rendered using the Monthly Voter Registration Services Report (**Exhibit J**) via the Provider Portal:
  - a. Number of clients who accepted the opportunity to register to vote;
  - b. Number of clients who declined the opportunity to register to vote;
  - c. The number of applications the subcontracted provider delivered to the SOE via mail;
  - d. The number of applications the subcontracted provider delivered via courier; and
  - e. The number of clients who accepted the opportunity to change his/her voter registration address.The completed Exhibit J shall be uploaded to the BBHC Provider Portal (Portal) in the "Contracts Documents" folder "Monthly Reports" sub-folder and named by the Contract Number / Provider Name / Month and date of the report.
9. Shall provide contact information to each client who accepts the opportunity to register to vote or update his/her voter registration to the SOE. Subcontracted provider staff shall not make any determinations as to the eligibility of any client to vote.

## II. Definitions

National Voter Registration Act (NVRA) – enacted by the U.S. Congress in 1993, and enabled in Florida with the Florida Voter Registration Act of 1995, in part requires all public offices that provide public assistance; state funded programs for persons with disabilities; recruitment offices of the Armed Forces; and other offices selected by state provide voter registration services.

Supervisor of Elections - official whose office oversees the electoral process in a County.

Voter Registration Agency (VRA) - public offices (e.g., any office that provides public assistance or serves persons with disabilities, center for independent living

or public library) required by law to offer voter registration opportunities. These offices accept voter registration applications dropped off in person or by mail; and provide each applicant for services the opportunity to register to vote or update registration; establishes procedures for providing voter registration services to telephone applicants; if the agency provides services to a person with disabilities at the person's home, provides voter registration services at homes; forward all complete and incomplete voter registration applications to the Supervisor of Elections within 5 days; retain declinations to register for 2 years; and collects data.

**Forms:**

Exhibit J, Voter Registration Monthly Services Report

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