



Quick Reference Guide –

Tips for Holding Union Officer Elections During the COVID-19 Pandemic

The Office of Labor-Management Standards (OLMS) of the U.S. Department of Labor has prepared this guide to help unions identify and prepare for challenges in conducting union officer elections during a pandemic. OLMS enforces certain provisions of the Labor-Management Reporting and Disclosure Act (LMRDA), which establishes certain rights for union members and contains provisions to ensure union democracy and financial integrity in unions. Title IV of the LMRDA establishes standards for the election of union officers.

This guide is intended for compliance assistance purposes only, providing general considerations while holding elections during a pandemic. It does not replace independent professional judgment. Always follow current Centers for Disease Control and Prevention (CDC) guidelines. *The procedures set forth in this guide do not carry the force of legal opinion and will not ensure an election free from protests or violations of Title IV of the LMRDA.*

Planning and Preparation

Thorough planning and preparation are key in conducting a fair and safe election. For example:

- Conduct a planning meeting early in the election process to assign responsibilities, consider safety issues, and plan for potential delays and increased costs.
- Familiarize yourself with all applicable state, county, and city regulatory requirements for indoor and outdoor gatherings, as it relates to the number of members and social distancing. Understand that these requirements may change throughout the election period, requiring unions to put alternate plans in place.
- Create pandemic toolkits with masks/face coverings, hand sanitizer, disinfectant wipes, gloves, signage, and portable plexiglass barriers.
- Consult with your international/national union to determine if any variance to your union's normal procedures requires special approval.

Notices

- If your membership is at home, consider sending the nomination notice by mail and/or email (if applicable) in addition to posting the notice at the worksite. Remember that election notices must be mailed.
- Highlight in the nominations and election notice(s) any changes that members may encounter, since social distancing or other safety measures may require modifications to typical election processes.

Nominations

- Consider conducting nominations virtually through videoconference or teleconference. If the nomination meeting will be held in person, consider allowing members the option to participate by videoconference if desired.
- Consider allowing members to submit written nominations and acceptances by email, by USPS mail, or by dropping them off at the union office.

Elections and Tallies

Polling Site Elections

- Be aware of current social distancing guidelines from local/state/national health authorities, and consider the size of your polling site(s) to ensure you are in compliance. Consider outdoor locations (e.g., parking garages, fairgrounds, or tented outdoor spaces). Remember that maintaining ballot secrecy is essential.
- Design your polling site to allow for social distancing. Establish limits on the number of voters permitted inside at one time. Avoid lines and encourage voting during off-peak hours. Consider whether your polling site will permit voters to flow through the voting process while maintaining appropriate distance. Consider extending polling hours to accommodate slower processing of voters due to social distancing.
- Consider an absentee ballot and/or drive-up voting option for those who are elderly, disabled, ill, or uncomfortable voting in person.
- Ensure that handwashing and/or sanitizing stations are available.

Mail Ballot Elections

- Anticipate pandemic-related delays throughout the mail ballot period. Consider adding additional days to the balloting period. Check local mail delivery standards, and use first class postage.
- Consider if exposure would be reduced by hiring a printer, mailing house, or balloting company for ballot printing and ballot package assembly. Remember to provide the right to observe these processes, and to ask the companies what steps they will take to ensure safety measures for observers.

Tallying Ballots – Polling Site and Mail Ballot Elections

- Set up a safe ballot tally space by observing safe social distancing and providing appropriate personal protective equipment for all election officials and observers.

Observers

- Balance candidates' LMRDA right to view all stages of the election with social distancing protocols.
- Establish clear rules for observers (e.g., require face coverings and safe distancing of at least 6 feet apart). Notify candidates and observers of enhanced safety protocols.
- Consider limiting number of attendees by encouraging slates or teams of candidates to designate observers to serve on behalf of a group.

Pandemic Resources

- Centers for Disease Control & Prevention (CDC) [cdc.gov](https://www.cdc.gov)
[*Toolkit for Reducing the Spread of COVID-19 During Elections*](#)
- U.S. Election Assistance Commission (EAC) is a source for general information on public election administration during the COVID-19 pandemic.
[*eac.gov – Health and Safety at the Polling Place*](#)

Contact Us

Visit us at www.dol.gov/olms. Email us at olms-public@dol.gov. Call DOL National Call Center at 1.866.4.U.S.A.-DOL.