

City of Milwaukee



Audit of the Election Commission Administration of Absentee Ballot

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City of Milwaukee, Wisconsin

September 2020

Office of the City Clerk

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September 29, 2020

Honorable Tom Barrett, Mayor
The Members of the Common Council
City of Milwaukee
Milwaukee, WI 53202

Dear Mayor and Council Members:

The attached report summarizes the results of the audit of the City of Milwaukee Election Commission's administration of absentee ballot. The scope of the audit included examining all policies, procedures, processes and documentation related to the Election Commission's administration of voting by absentee ballot.

The audit objective was to:

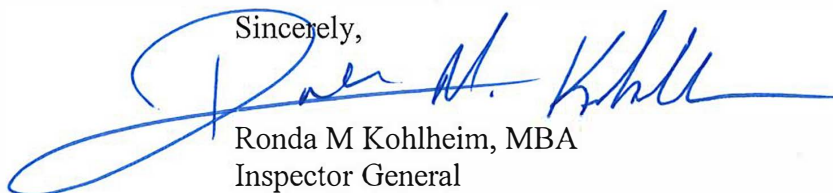
1. Determine whether voting by absentee ballot was properly administered by the Election Commission as prescribed by the Wisconsin Elections Commission (WEC); Wis. Stat. §§ 6.22; § 6.24; 6.86(1)(b),(3)(a); §§ 63.875; § 7.15(1)(cm); and all other applicable rules and regulations.

The audit concluded that the controls in place over the Election Commission processes are adequately designed and are operating effectively. However, for certain controls identified in this report, enhancements should be made to the control design to ensure operational efficiencies. This report identifies six recommendations to address these issues.

Audit findings are discussed in the Audit Conclusions and Recommendations section of this report, and are followed by management's response.

Appreciation is expressed for the cooperation extended to me by the personnel of the Election Commission.

Sincerely,



Ronda M Kohlheim, MBA
Inspector General

I. Audit Scope, Objectives and Methodology

The audit examined the Election Commission's administration of absentee balloting. The scope of the audit included examining all policies, procedures, processes and documentation related to the Election Commission's administration of voting by absentee ballot. The audit period was for the April 7, 2020, Spring Election and Presidential Preference Primary.

The objective of the audit were to:

1. Determine whether voting by absentee ballot was properly administered by the Election Commission as prescribed by the Wisconsin Elections Commission (WEC); Wis. Stat. §§ 6.22; § 6.24; 6.86(1)(b),(3)(a); §§6.84(1), 6.875; § 7.15(1)(cm); and all other applicable rules and regulations.

The audit was conducted in accordance with generally accepted government auditing standards. Those standards require that the audit be planned and performed so as to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objectives. I believe that the evidence obtained provides a reasonable basis for the audit's findings and conclusions based on the audit objectives.

Methodology

The audit methodology included developing an understanding of the processes and controls over the Election Commission's absentee ballot processes. To establish appropriate evaluation criteria for this audit controls and procedures specific to the administration of absentee balloting in the City of Milwaukee Election Commission (MEC) were tested. The procedures also included elements from best-practice criteria. These standards were relevant during audit testing, finding identification, and recommendation development.

The audit procedures developed to evaluate the processes and controls to meet the audit objectives included: process walk-throughs; inspection of relevant control documentation; and the testing of controls as follows:

- Reviewed internal policies, procedures, and guidelines related to processing absentee ballots.
- Reviewed absentee ballot application requests to ensure the ballot delivery method agreed to method per the application in WisVote.
- Assessed compliance with Wis. Stats §§ 6.22; §6.24; 6.86(1) (b) (3) (a), 6.875; § 7.15(1) (CM); and any other applicable rules and regulations.
- Verified that an absentee ballot was mailed to voters requesting them within one business day.
- Verified for military and overseas voters with an absentee ballot request on file that a Presidential/Federal (“A” Ballot) was mailed to the voter no later than February 20, 2020.
- Verified that an Official (or “B” Ballot) was mailed to both military and temporary overseas voters by the 21st day prior to the election (March 17, 2020).
- Verify that an absentee ballot was mailed to the voter within one business day of the respective aldermanic district contacting the Election Commission on behalf of the voter.

II. Organization and Fiscal Impact

Wisconsin Elections Commission



In the past ten years, several changes have occurred in the way the State of Wisconsin conducts elections. At a local level, municipal clerks are entrusted with the responsibility of ensuring fair, accessible and transparent elections. In 1974, the State Elections Board was created transferring administration of campaign finance and election laws from the Secretary of State to a partisan-

appointed Board and a nonpartisan staff; and in 2007 Wisconsin Act 1 merged the former State Elections Board and the State Ethics Board to create the Government Accountability Board (GAB), which began its work in January 2008. The GAB was comprised of six nonpartisan former judges appointed by the Governor and confirmed by the State Senate. In 2015, the Legislature passed 2015 Wisconsin Act 118, which eliminated the GAB and replaced it on June 30, 2016 with the current Wisconsin Elections Commission (WEC) to administer elections and the Wisconsin Ethics Commission to administer campaign finance, ethics and lobbying law. The staff remains nonpartisan. The WEC is comprised of six members; the four legislative leaders appoint four members and the Governor appoints two. The WEC administers and enforces Wisconsin election laws and provides municipal clerks with a range of both technical and direct support to carry out their duties. WEC staff is available to provide clerks with answers and advice to assist them in fulfilling their obligation to protect the integrity of elections and to ensure public confidence in the election process.¹ The WEC provides access to and maintains the WisVote system and the MyVote website, along with technical support and training related to both the system and website.

City of Milwaukee Election Commission



The City of Milwaukee’s Election Commission (“MEC”) manages all aspects of public elections in the city. The MEC provides administrative oversight of candidate filing and campaign finance

¹ Wisconsin Elections Commission. Administering Wisconsin’s Election Laws. About the Wisconsin Elections Commission, <https://elections.wi.gov/about>.

reporting requirements for locally elected offices; advocates for changes to election laws that encourage access to voting or eliminate barriers to voting; and follows all state and county protocols for ensuring the security of voter registration and election results data. In addition, the MEC eliminates physical and language barriers at voting sites through compliance with Section 203 of the Voting Rights Act and meeting voting site accessibility requirements. Further, it collaborates with community partners to promote the public's understanding of and participation in the electoral process; and maintains the highest level of public transparency for all election processes. The MEC maintains a voter registration database of approximately 310,000 registered voters and operates approximately 190 polling locations staffed by 1,200 to 2,500 election workers. It also provides the necessary documents, supplies, and ballots to each voting site on election days. Additionally, the MEC oversees all aspects of absentee voting, including in-person absentee, absentee by mail, military, and overseas absentee. The MEC administers the statutory obligations for elected officials and potential candidates for municipal offices including the nomination process and campaign finance reporting; and collaborates with non-partisan voting rights groups to encourage voter education and participation. It operates a website where residents can locate their polling place and elected representatives, provides instructions for registration and absentee voting, as well as, requirements for voter eligibility.²

In 2020, there are four scheduled elections, which include the Presidential Preference and General, Mayoral and Aldermanic races and County Supervisors, as well as other state and federal contests. The scheduled elections are:

- February 18, 2020 – Spring Primary
- April 7, 2020 – Spring Election
- August 11, 2020 – Partisan Primary
- November 3, 2020 – General Election and Presidential Election

Absentee Ballot Process

In Wisconsin, any qualified voter who is unable or unwilling to appear at their respective polling location on Election Day has the right to vote by absentee ballot, Wis. Stat. § 6.85.³ A registered

² 2020 Plan and Budget Summary, City of Milwaukee. Election Commission p. 73.

³ Wis. Stat. Chapter 6, The Electors, Subchapter IV Voting Absentee § 6.85 Absent elector; definition.

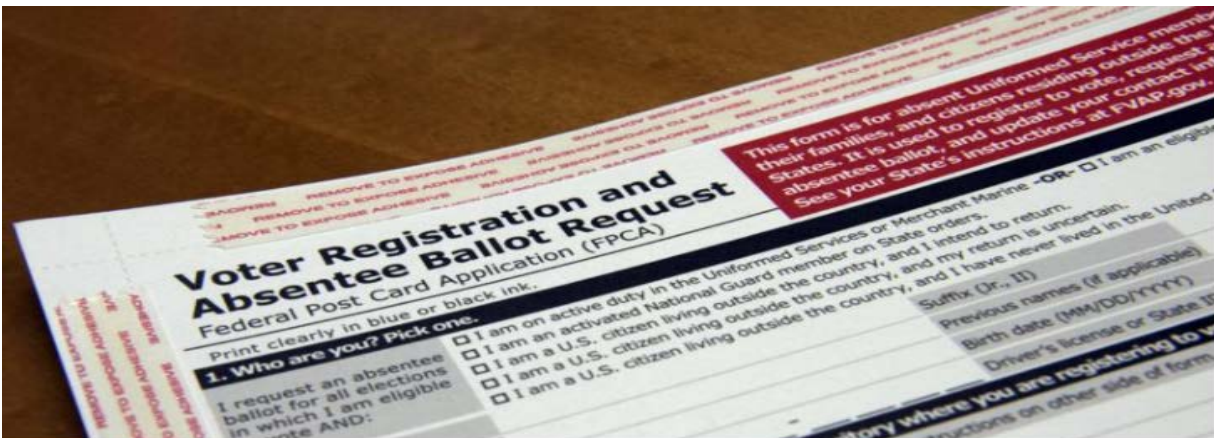
voter opting to vote by absentee ballot must submit a written request to their respective municipal clerk. In the City of Milwaukee, requests for absentee ballots are submitted and processed by the Election Commission. However, WEC staff provides both technical and direct support to the MEC for the processing of absentee ballots. An absentee ballot request can be made to the MEC in writing or electronically using the Application for Absentee Ballot (EL-12 1), *see Appendix A*, or a letter requesting an absentee ballot, which provides the same information required on the application.

The written request should include the voter's:

- Name
- Residential address
- Mailing address (if different than residential address)
- Signature
- Proof of identification (if necessary)

In addition to the absentee ballot application, Military and Overseas voters may also use the Federal Postcard Application (FPCA), *see Figure 1 below*. The FPCA is a combination registration form and absentee ballot request. A voter may also apply for and vote by absentee ballot in person at the Election Commission (Wis. Stat. § 6.86).⁴

Figure 1: Federal Postcard Application (FPCA)



By: CT Viewpoints: Gail Berritt, Jonathan Perloe, Alisa Trachtenberg ET. AL

⁴ Wis. Stat. Chapter 6, The Electors, Subchapter IV Voting Absentee § 6.86 Methods for obtaining an absentee ballot.

Absentee ballots can be requested through the deadline dates as follows:

- By mail: The request must be in the office of the municipal clerk no later than 5:00 p.m. on the *5th day preceding an election.
- In-person at the Clerk's office: The last possible day for a clerk to conduct in-person absentee voting is the Sunday before the election. Each municipal clerk's office sets its own schedule for in-person absentee voting.
 - **Note:** A person cannot request an absentee ballot in person and leave the clerk's office with the ballot. The ballot is either voted in the clerk's office or the clerk must mail the ballot to the elector.
 - The deadline for indefinitely confined electors and military electors (not away) to request an absentee ballot is the 4th day before the election.
 - For a federal election, the deadline for military electors who are away from their residence due to active duty to request an absentee ballot is 5:00 p.m. on Election Day.
 - There are special provisions for hospitalized electors and sequestered jurors to request and vote by absentee ballot on Election Day. Wis. Stat. §§ [6.86\(1\) \(b\)](#), [\(3\) \(a\)](#).

Military and Overseas Absentee Deadline (April 7th) - Federal and state law require that municipalities send absentee ballots to their military and overseas electors with requests on file in accordance with the deadlines set forth below:

- This deadline requires clerks to send all military and overseas voters with an absentee request on file a Presidential Preference-only, or 'A' ballot, by **February 20, 2020**.
- Any requests received after the federal deadline on Saturday, **February 22, 2020**, must be honored within 24 hours and the ballot must be sent by the method requested by the voter.

Note: The 'A' ballot that will initially be sent will only contain the Presidential Preference contest and will be provided by the county clerk.

- Clerks will also have to send an official or 'B' ballot to all military and temporary overseas voters by the 21st day prior to the election, March 17, 2020.

- Any requests received after the federal deadline on Saturday, February 22, 2020, must be honored within 24 hours and the ballot must be sent by the method requested by the voter.

Note: Permanent overseas electors may vote only in federal contests and should only be issued a Presidential Preference-only ‘A’ ballot.

Two ballots are required for most Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA) voters due to the statutory conflicts between absentee ballot lead times. For state and local elections, the deadline to send ballots to voters with an absentee application on file is 21 days before the election.

- For partisan and federal elections, the deadline is much earlier – 47 days before the election. 47 days before April 7, 2020 was February 20 – two days after the spring primary, which was on February 18.

Note: For the above reason, all military and overseas voters who had absentee ballot requests on file with the municipal clerk should have been sent the Presidential Preference-Only ballot no later than February 20.

The MEC is required to enter absentee ballot applications and ballot information into the WisVote system within 48 hours after mailing or receiving an in-person absentee ballot application (Wis. Stat. §6.33 (5)). According to WEC, given the increase in absentee voting and the growing public interest in obtaining absentee ballot data, it is important that clerks are able to timely and accurately enter absentee ballot data into WisVote including entry of absentee applications, issuance of ballots, and recording ballot statuses. The WEC staff plays an important role in assisting clerks with entering and tracking absentee ballots in the WisVote system.⁵

⁵ Wisconsin Elections Commission, April 7, 2020 Absentee Voting Report

Spring Primary Election (April 7th)

On March 11 2020, the World Health Organization declared a pandemic of the coronavirus disease (COVID-19);⁶ and on March 25, Wisconsin's Governor Tony Evers issued a 'Stay-At-Home' order. Despite the pandemic, rapidly changing rules, public health guidance, and voter behavior shifting towards voting by absentee ballot, Wisconsin was the first state known to have conducted a statewide election during the COVID-19 pandemic. Due to the pandemic, the MEC had fewer volunteers and there were only five of 180 polling sites open for the Spring Election. In light of the pandemic, the MEC experienced an astonishing increase in requests for absentee ballots. The increase in requests created an array of issues with the delivery and return of absentee ballots. Specifically,

- Absentee ballots requested by voters on March 22nd and March 23rd were not delivered.
- Ballots from the post office, returned by voters, did not receive a postmark. The MEC was unable to determine whether they were received by the Postal Service in time to be included in the official election count.
- Containers of absentee ballots were found at a Milwaukee Postal Service Processing and Distribution Center after the April 7, 2020 Election Day.

III. Audit Conclusions and Recommendations

The internal controls developed and implemented by MEC management over absentee ballot processes have been designed to provide management with assurance that processes and controls are performed consistently and are in compliance with policy, procedure, federal and state regulations, and best practice. The audit concluded that controls in place over the MEC's administration of voting by absentee ballot are adequately designed. However, controls identified within this report, enhancements should be made to the control designs and operational processes over establishing and documenting evidence to ensure fair, assessable and transparent elections. This audit report identifies seven recommendations to address these issues:

⁶ White House.Gov: Proclamation on Declaring a National Emergency Concerning the Novel Coronavirus Disease (COVID-19) Outbreak

1. Develop a well-defined, comprehensive absentee ballot training manual to outline systematic absentee ballot procedures.
2. Strengthen control procedures to prevent, detect, and correct identified system errors, failure to fulfill an absentee ballot request and to ensure the fulfillment of all absentee ballot requests are in compliance with applicable regulations.
3. Eliminate the use of the City's third-party mail service vendor and implement a process to create checkpoints for absentee ballots from time it leaves the Election Commission, to confirmation of receipt by the U.S. Postal Service and to delivery to the voter.
4. Develop, implement, and document internal controls over the security and storage of all election-related equipment, supplies, and documentation, including absentee ballots.
5. Conduct an election security review over the administration of election processes, including absentee ballot; and develop contingency and change management plans to identify, assess, and respond to events that may disrupt election processes.
6. Enhance communication efforts to educate voters on the proper methods to cast their vote by absentee ballot and other procedures required for receiving an absentee ballot and returning the envelope to ensure the ballot is counted.

A. Training and Development

According to the United States Election Assistance Commission (EAC), election officials deal with some of the same responsibilities as public servants in other government agencies. All government entities should operate under clear and detailed training manuals, policies, and procedures to ensure accuracy, transparency and uniformity of service. Similarly, each division or section of an elections office should have clearly written training manuals, policies and procedures.

Figure 2: Aims and Objectives Training and Development



By: Career & Educations & Education, Management: Difference between Training and Development, <http://www.differencebetween.net/miscellaneous/career-education/difference-between-training-and-development>.

Best practice recommends that unifying internal processes are necessary to ensure that every voter has the same experience when dealing with the elections office. With the unique responsibility of preparing for an election, officials should develop some type of Quality Management System (QMS) that includes a clear and well-defined written guide of instructions helpful to both new and established employees. A complete QMS should include work flow diagrams based on the written policies and procedures. These diagrams illustrate the processes for all internal and external activities. Some election officials encourage staff to develop these diagrams and then allow staff members from one division to review proposed workflows for staff members of another division. This collaborative opportunity allows all staff members to understand how their work affects the entire organizational mission and it provides a chance for staff to work together to achieve efficiencies in programmatic responsibilities.

As election rules and regulations are constantly changing, even an established elections employee may find it challenging to remember all the nuanced aspects that they learned and need to know about election processes. In addition, best practice suggests that providing a written guide of instructions and tips for a specific task is helpful during the initial as well as useful for individuals later on as a point of reference. Employees can refer to their training manual to seek an answer to a question before asking for assistance from their supervisor.

Testing concluded that systematic policies and procedures over absentee ballot processes should be developed, and used as a training manual, similar to the election inspector-training manual to outline individual systematic absentee ballot procedures; and to eliminate the possibility of operational inefficiencies.

Specifically,

- The Election Commission relies on instructions provided by the Wisconsin Elections Commission (WEC) for absentee ballot processes. However, the instructions provide guidance specifically to WisVote, the voter registration system. At the local level, clerks should develop policies and procedures detailing their internal processes for all election related processes. The Election Commission's internal absentee ballot operating policies and procedures lack the detailed information for operating procedures necessary to control the flow of materials and expedite the overall procedures.
-

Recommendation 1: Develop a well-defined, comprehensive absentee ballot training manual to outline systematic absentee ballot procedures.

To enhance the level of internal controls over the absentee ballot processes, Management should develop systematic policies and procedures, and use them as a training manual, similar to the Election Inspector Training Manual, to outline the individual procedures. Specifically,

Management should consider including the following procedures:

- Document the specific procedures for fulfilling military and overseas absentee ballots.
- Incorporate the Special Voting Deputy policies and procedures as part of the training manual.
- Define the process for fulfilling an absentee ballot request received via email.
- Include the steps for fulfilling an absentee ballot request received by fax.
- Establish and document the process for follow up on:
 - Undeliverable absentee ballots
 - Incomplete absentee ballot application requests
 - Incomplete faxed absentee ballot request

- Define the ballot inspection procedures for ensuring voted ballots are recorded accurately as intended by the voter and the process for damaged or defective ballots that would cause problems in tallying.
- Define and detail the confirmation process for ensuring the voter completed and signed the absentee certificate envelope and that it was witnessed appropriately. In addition, implement a process to contact the elector and arrange to correct any identified issues. If time does not permit, or it is not possible, develop a process to document why the commission was unable to contact the voter.
- Outline the process for maintaining and securing the absentee certificate envelope containing the elector's voted ballot (including being kept in a carrier envelope, at Central Count (warehouse) and in a secure place in the Election Commission's office until Election Day).
- Document the process on election day for delivering the carrier envelope containing all absentee ballots received to the proper polling place before the polls close at 8:00 p.m. including any absentee ballots received by the clerk on election day.
- Document the process to ensure absentee voting instructions, an absentee certificate envelope, and the absentee ballot are placed inside a mailing envelope addressed to the requesting elector.
- Detail the process to ensure that the date of receipt for the returned absentee ballot is entered on the absentee ballot log, upon receipt.
- Document the process for including the absentee ballot application date of receipt, the name and address of the requestor, the date the absentee ballot was issued (sent) and any other information pertinent to the absentee ballot application request on the absentee voter log.
- Document the process to ensure election staff initials the ballot at the "absentee ballot issued by" line in the endorsement section. Consider implementing a secondary review process to ensure the initials are included.
- Include the process for entering, logging and documenting absentee ballot request that are received throughout the year. Define the process to ensure that absentee ballots are issued for each election.

- Define the process for maintaining an audit trail of ballot envelopes received, accepted, not accepted, rejected and tallied.
- Consider preparing an election specific timeline detailing each process involved in completing absentee ballot application requests, in chronological order, including staff assignments and completion dates.

Specifically, highlight in bold any dates mandated by federal or state laws.

- Last day to register to vote and/or update voter registration information.
- The date that the ballot file should be sent for printing.
- The date that printed ballots should be delivered.
- The date that Military/overseas ballots must be sent.
- Also, document the process for determining how many ballots to print by reviewing State law and the history of voter turnout for a similar election. Develop a “Plan B” for how to respond to a ballot shortage.

The absentee ballot training manual should be an all-inclusive instructions manual of processes that occur internally to fulfill an absentee ballot request.

B. Absentee Ballot Controls and Processes

An internal control is a process designed to ensure that the goals of an organization are met with respect to effective and efficient operations; reliable financial reporting; compliance with laws, rules and regulations; and protection of an organization’s assets. Even the best internal control processes can provide only reasonable assurance that those goals are met. The most elaborate or expensive either internal control process or system can be defeated by accident or by intention; however, a well-designed process will reduce the risk of undetected errors or intentional acts. Typically, an internal control process includes control environment; risk assessment; control activities; information and communication; and monitoring (*see Figure 3 below*). The separation of duties will always be the key ingredient in any internal control process. With lack of

separation of duties, it is almost impossible to be reasonably assured that the goals of an organization are being met.⁷

Figure 3: Components of Internal Controls



By: *Brown University: Office of Internal Audit Services, Internal Control Concepts*,
<https://www.brown.edu/about/administration/internal-audit/internal-control-concepts>

Best practice recommends that a system of internal controls can contribute to fair, accessible and transparent elections. While neither federal nor state election authorities require any particular set of internal controls, implementing effective internal controls would play an important role in meeting specific election requirements as well as ensure fair, accessible and transparency in election processes. Conversely, a lack of internal controls and oversight can create an atmosphere that contributes to mismanagement of absentee ballots, and a lack of concern for the accuracy of absentee ballots mailed, returned, counted or rejected. Internal controls in place over absentee ballot processes should provide validity and integrity under the provisions of existing law and be revised and updated as changes to laws occur as applicable to a respective election.

Voting by mail is quietly becoming a comfortable option for not only elderly and disabled individuals, but for a significant minority of all voters in the country. One extremely important aspect of voting by mail is how confident voters are in the accessibility, transparency, and fairness in absentee ballot processes in order to be assured that their ballots are counted. In addition, and as a result of the COVID-19 pandemic, voting by mail is on the rise and municipalities nationwide are looking for opportunities to ensure integrity, meet guidelines, timelines and regulations for the upcoming Presidential Election. Effective internal controls will

⁷ Federal Election Campaign Act (FECA) and the Commission Regulation: Internal Controls and Political Committees, https://www.fec.gov/resources/cms-content/documents/internal_controls_polcmtes_07_EO13892.pdf.

provide the triple benefit of assisting the MEC in meeting goals; protecting the integrity of the election process; and increase it is in the likelihood that the MEC's response to a request complies with applicable rules and regulations.

Testing of audit procedures concluded that internal control procedures over voting by mail processes should be strengthened to prevent, detect, and correct identified system errors, failure to fulfill an absentee ballot request, and to ensure that the fulfillment of all absentee ballot request complies with applicable rules and regulations; as well as to ensure election processes are fair, accessible, and transparent.

Specifically,

- For the April 7th Election, there were over 2,600 absentee ballot requests that were never issued to the registered voter.
- Of 320 absentee ballots selected for review, an absentee ballot was not mail to six registered voters who requested an absentee ballot for the April 7th Election.
- For 81 absentee ballots requested by Special Deputy, a vote by absentee ballot did not occur for one voter.
- There was one absentee ballot requested by fax that was not issued to be the voter and the individual did not cast their ballot in person on Election Day.

Recommendation 2: Strengthen control procedures to prevent, detect, and correct identified system errors, failure to fulfill an absentee ballot request and to ensure the fulfillment of an absentee ballot requests are in compliance with applicable regulations.

To prevent, detect and correct identified system errors, failure to fulfill an absentee ballot request and to ensure the fulfillment of an absentee ballot request is compliance with applicable regulations, Management should strengthen control procedures:

Specifically,

- Develop a secondary review process to ensure absentee ballot application requests are fulfilled within one business day of receipt of the request.

- Consider the use of envelope printers to print voter mailing information directly on the envelope instead of mailing labels.
 - Review outgoing and return ballot envelopes to determine ways to incorporate the use of technology to improve staff efficiencies and implement voter user-friendly techniques, while ensuring that all statutory requirements are met.
 - Review the area designated for pulling and stuffing ballots to determine space needs to develop an efficient workflow. Implement the policy of working in teams of two to ensure accuracy. Staff assignments should include individuals designated as ballot pullers and ballot stuffers. Consider implementing a “two person” integrity and separation of duties throughout the process.
 - Document, implement and designate personnel authorized to drop-off and pick-up absentee ballots from drop off sites as well as specify designated times to retrieve ballots from drop-off locations.
 - Mailing preparation and USPS delivery coordination for:
 - Special Voting Deputies
 - Regular absentee ballot requests
 - Emailed absentee ballot requests
 - Military and overseas absentee ballot requests
-

Absentee Ballot/Vote by Mail

According to the United States Postal Service (USPS), they fulfil their role in the electoral process by providing secure, efficient, and effective ways for citizens in elections when policymakers make a decision to use mail as part of the election process. Due to COVID-19, there has been an increase in the number of jurisdictions expanding or initiating absentee ballot and voting by mail options.⁸ Due to the coronavirus, states are making it easier for voters to participate in the upcoming Presidential Election. The Wisconsin April 7th Spring Primary election for voting by absentee ballot, reached unprecedented levels as a result of the COVID-19 pandemic.

⁸ United State Postal Service: Election Mail, <https://about.usps.com/what/government-services/election-mail>.

Figure 5: Gov. Northam Announces Proposals to Expand Safe, Fair Voting Access



By: NBC 12: Adrianna Hargrove, Richmond, Va. (WWBT), <https://www.nbc12.com/2020/08/18/gov-northam-announces-proposals-expand-safe-fair-voting-access>.

As reported by the WEC, the vast majority of voters were able to receive and return their absentee ballots in time to be counted, but some voters who requested ballots in good faith did not receive them due to a fault of their own. The April 2020 election produced several records for Wisconsin, including:⁹

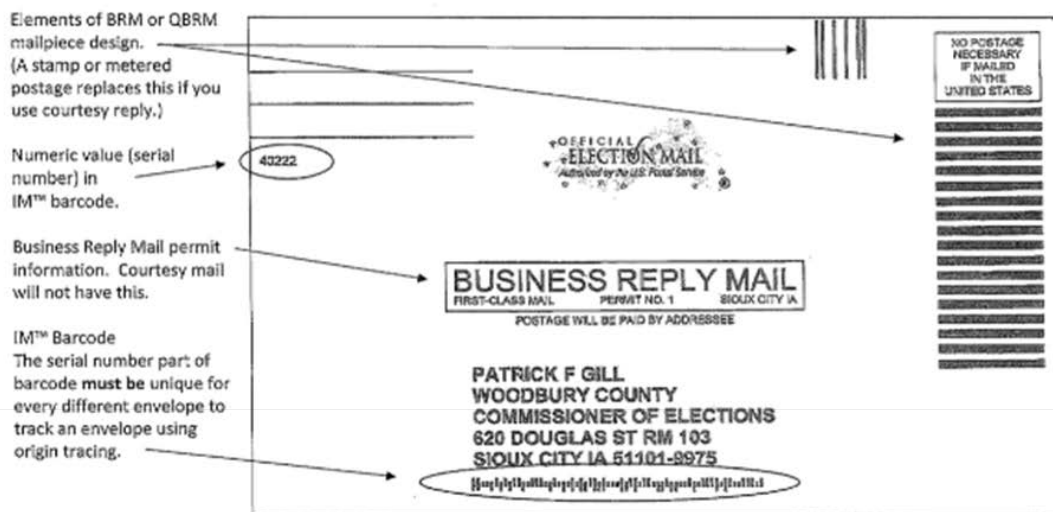
- The most absentee ballots cast by mail in any election;
- The most absentee ballots ever cast;
- The second most absentee ballot, in total, cast in a Spring Election; and
- The most absentee ballots cast in person during a Spring Election.

In light of the April 7th election with mail-in ballots being lost or not delivered and in order to address COVID-19 in preparation of the November 3, 2020, General and Presidential Election, the WEC has planned to integrate Intelligent Mail barcodes (IMb), see Figure 4 below, into WisVote, the Wisconsin state-wide voter system for mailing absentee ballots. The use of IMb technology is essential to increase accountability and transparency for the absentee ballot/vote-by-mail process. The IMb is a 65-bar USPS™ barcode that is used by the USPS to sort and track mail.

⁹ Wisconsin Elections Commission (2020): April 7, 2020 Absentee Voting Report,

A single barcode allows users to participate in multiple postal service programs, track individual pieces of mail, and have greater visibility to mail pieces through its journey in the mail stream. There are different types of IMb used on envelopes for absentee ballots: outbound IMb; inbound IMb; serialized (unique ballot level) outbound IMb; and serialized (unique ballot level) inbound IMb. The IMb is printed on the absentee ballot envelope and is typically printed by the municipality's mail vendor or printer. Any envelope printed with an IMb can be traced through the mail stream process; however, only a serialized IMb can identify a specific voter's ballot.

Figure 4: Anatomy of an IMb Envelope



By: Iowa Starting Line: Dems Score First Legal Victory in Getting Winneshiek Absentee Ballots Counted, <https://iowastartingline.com/2018/12/03/dems-score-first-legal-victory-in-getting-winneshiek-absentee-ballots-counted/>.

The integration of IMb will reveal the individual steps in the mailing of absentee ballot; offer the MEC greater assurance that mailed absentee ballots will reach voter mailboxes; and save on the cost for reissuing a duplicate absentee ballot. Most importantly, the IMb will divulge the last USPS location where a container of absentee ballots was scanned allowing MEC staff to determine where an absentee ballot is in the mail stream. Additional benefits to using IMb on absentee ballot envelopes include the differentiation from other types of mail within the USPS' internal tracking system; the use of serialized unique ballot specific IMb, because the MEC can monitor ballots that are traveling through the mail stream and analyze data regarding the ballot delivery and any delays; to determine timeliness as an alternative to the postmark as well as the

ability to trace the entry of a returned ballot entry in the mail system, allowing determinations of timeliness.

Testing of audit procedures concluded that absentee ballots mailed during the April 7th Election were mailed using United Mail Services, the City's third-party mail service vendor. The USPS Inspector General's investigation disclosed that the third-party vendor co-mingled absentee ballots with other pieces of mail and were unable to confirm the exact count of ballots received by the MEC.

Specifically,

- During the April 7, 2020 Spring Election, it was determined that several absentee ballots were lost and had not been delivered to voters by the United States Postal Service and the Election Commission was unable to determine, which ballots were lost.
- There was confusion to the location the City's mail is delivered to for mailing. Due to the high volume of mail, it was delivered to the postal service in downtown Milwaukee. However, some voters reported that their mail was issued from a post office outside of City of Milwaukee limits.
- The Election Commission does not put absentee ballots in a pre-numbered order to ascertain date ranges of mailed ballots on a given date.

Recommendation 3: Eliminate the use of City's third-party mail service vendor and implement a process to create checkpoints for absentee ballots from the time it leaves the Election Commission, to confirmation of receipt to the U.S. Postal Service, to delivery to the voter.

The Wisconsin Elections Commission will soon begin using USPS Intelligent Mail barcodes (IMb) for absentee ballot envelopes. IMbs will allow voters and the Election Commission to track where a ballot is in the postal system as it travels from the Election Commission to the voter's home and back to the Election Commission. Prior to every election, the Election Commission should contact the local post office to review all policies and procedures relating to mailing, tracking, and receiving the ballots.

Specifically,

Notification

- The Election Commission should establish a point of contact at the USPS on St. Paul Avenue.
- The MEC should consider establishing an email address specifically for direct communication with the USPS point of contact.
- The Election Commission should consider notifying the U.S. Postal Service point of contact with details of the absentee ballots that are in transit from the Election Commission to the post office. The email should include instructions as a pre-notification only. The instructions as notated on the actual mail trays should be followed regardless of the contents of the email.

Mail Preparation

- Election Commission staff should place cardboard sleeves over the trays and secure them in place with clear packaging tape.
- Each container containing mail should be numbered (ex. 1 of 4).
- The Election Commission should place a cover sheet on each container with an item count.
- A sheet should accompany the envelopes stating instructions for the mailing, such as mail code number, rate of postage, sealing orders, etc. as well as a total piece count and contact information.
- Unless otherwise noted, mail should be delivered directly to the USPS on St. Paul Avenue, by Election Commission staff, and returned directly to the Election Commission.
- Identify a specified location (dock) at the postal service where absentee ballots should be dropped off for mailing to voters.
- Coordinate delivery of outgoing ballots with the Post Office for a scheduling timeframe that allows for the immediate distribution of ballots.

Mail Metering (Verification)

- Consider requesting that the Postal Service designee return the instruction sheet with the metered envelopes with a notation on the piece count metered and operator's initials.

- If there is a discrepancy in the number of pieces metered versus the number reported by the Election Commission, work with the postal service designee to ensure that postage has been applied to all pieces, and manually count them at this time. If the numbers still do not match, send an email to the designated USPS email, as well as key Election Commission staff.

Other Area of Consideration

- Identify possible timeliness, scheduling and delay issues that could occur.
- Identify staging requirements (i.e. work areas for barcoding, tray assembly, sorting, etc.).
- Consider quality control and security issues. Indicate how ballot transportation security needs will be addressed (i.e. from Election Commission to Post Office).
- Specify quality control issues such as tracking and audit trails.
- Establish a method for addressing and labeling envelopes.
- Consider options for a return mailing address for voted ballots with the post office.

Options may include:

- Election Commission's office address and zip code plus 4-digit code.
- Post Office assigns a special "plus 4" for the Election Commission only.
- Establish a specific Post Office box for returned ballot envelopes.

C. Election Access Controls and Safeguarding

Access Controls

Best practice and standard inventory considerations mandate the utilization of documented control-based policies and procedures over inventory management. The appropriate safeguarding of inventory means that documented control-based policies and procedures have been implemented to provide reasonable assurance regarding the prevention or timely detection of unauthorized acquisition, use or disposition of city's assets. Assurance must exist that transactions related to assets have been properly processed and that appropriate physical handling and control over assets are in place. Typically, access controls are the best way to safeguard these assets. Several examples of standard access controls include: locked, secured doors; card-key systems; locked filing cabinets or safes; and computer passwords.

Testing of audit procedures concluded that although key card system controls limit accessibility to the Election Commission's office, risk mitigating processes and controls over inventory management and safeguarding should be developed, documented and implemented to strengthen operational efficiencies over election absentee ballot processes.

Particularly,

- Voted absentee ballots returned to the Election Commission are maintained in a locked room within the commission, until they are transported to Central Count; however, the Election Commission staff was unable to provide me with a list of individuals who have access to the room.
- The Special Voting Deputy has 18 hours to return all absentee ballots and voting materials, including voted absentee ballots to the Election Commission, or after a second visit to the same facility is conducted, if applicable.

Recommendation 4: Develop, implement and document internal controls over the security and storage of all election-related equipment, supplies and documentation, including absentee ballots.

Although a key card is required for access to the Election Commission, the risk mitigating processes and controls of inventory management and safeguarding should be developed, documented and implemented. To strengthen physical controls and segregation of duties over assets,

Management should:

- Create or update the audit trail checklist to ensure it identifies all required audit trail documents for the election.
- Review all audit trail checklists to ensure they incorporate two-person integrity security measures such as dual sign-off.
- Review voting equipment storage and work areas to ensure only authorized personnel have access.

- Review the list of personnel who have keys to access work areas and voting equipment storage to ensure all keys are accounted for and only authorized personnel have keys. Consider eliminating the distribution of master keys or key cards; instead, issue access keys or key cards to personnel based on job duties and responsibilities, ensuring that individual staff members do not have the ability to enter the office and access returned absentee ballots undetected.
- Implement a two-person rule during the handling of absentee ballots by any Election Commission staff (permanent, temporary, etc.) to ensure there is no tampering or corruption of absentee ballots.
- Prepare and maintain an up-to-date written security plan on the processing of absentee ballots. The plan should include:
 - Security for the timeframe of ballot transportation (e.g. from printing to location of ballot insertion; mailing from Municipal Research Library to United Mailing Services, etc.)
 - Security for ballots during processing.
 - Security for ballots from drop off sites.
 - Guidelines for security involving observers.
 - Documentation of the security over the Election Commission (office work area), building and ballot storage (alarms, cameras, special keys, limited keys, etc.).
 - Documentation of security for vote tally systems, computer access security, and off-site storage for system backups (if applicable).
 - Storage of empty returned envelopes and voted ballots in separate, tamper-evident, sealed containers.
- For each election, perform a risk assessment for the administration of absentee ballots to identify those portions of the process where security and integrity is vulnerable to destruction, disruption, tampering or corruption from both internal and external sources.
- Establish and maintain a log of all individuals who have access (keys, electronic codes, etc.) to secure areas containing absentee ballot documents. The access log should include employee name, reason for access, date and time.

- Consider installing appropriate security devices in all areas where absentee ballots are stored, accessed, handled, etc. (i.e. alarms, cameras, locks, special keys, limited keys, two-person access to restricted areas, etc.).
 - Require Special Voting Deputies to return absentee ballots and voting material, including voted absentee ballots to the Election Commission daily, locking and storing them in a secure location with restricted access.
-

Contingency and Change Management Plans

According to the EAC in elections, physical security refers to standards, procedures, and actions taken to protect voting systems, related facilities and equipment from natural and environmental hazards, tampering, vandalism, and theft. Physical security safeguards are required for voting systems in storage, in transit, in the polling place, and in use on election day through the post-election certified canvass. Documentation of the election process, from election setup proofing documents to logic and accuracy testing, is the foundation for security in elections. This documentation, required by full-time staff during the pre-election stages and by poll workers on Election Day, provides the audit trail for the election and establishes proof that all components of managing the election were secure at all times. This type of documentation may also serve as an official court record in the event of a recount or contested election.

In addition, change in election administration processes is inevitable, and effective management requires election administrators to develop contingency and change management plans to respond to situations in a timely and effective manner. Contingency planning and change management are indissolubly linked to each other and may at times be developed concurrently.

- **Contingency Planning** – is the development of a management plan that addresses an election office’s response to emergency and crisis situations that might arise. Examples of contingencies include, but are not limited to, natural disasters (e.g. earthquakes, severe snow and rain storms, fires, etc.), technology disasters (e.g. power outages), political and social events (e.g. war, civil unrest, medical emergencies, etc.), and election-related emergencies (e.g. lack of poll workers or polling places, shortage of ballots or voting systems, charges of voter intimidation, etc.).

- **Change Management** - refers to how an election office handles situations that effect how the office functions in its capacity as an election and voter registration agency. Example: changes in Federal and State laws, budget fluctuations, relocation of election office, staffing changes, agency reorganization, etc.¹⁰

The goal of both these management plans is to prevent or minimize the impact of change (expected or unexpected) on election and voter registration processes, while preserving the integrity of the electoral system. The plans should be vetted with federal, state, and local laws, regulations, and relevant case laws to ensure they are properly and lawfully implemented. Election officials should contact their State officials when there is a question as to whether a practice is permitted or prohibited.

Testing of audit procedures suggest a security review over the administration of Election processes, including absentee ballots should be conducted. In addition, both a contingency and change management plan should be develop to identify, assess, and respond to events that could potentially disrupt Election processes.

Particularly,

- The Election Commission’s logistical challenges in keeping voters safe in pandemic conditions; an increase in absentee ballot requests; undelivered absentee ballots; limited number of polling locations; and a shortage of poll workers.
- During the April 7th Spring, the Election Commission did not have enough poll workers to satisfy election staffing needs, as a result of the pandemic.
- The Election Commission does not have a contingency or management plan in place to address an emergency or crisis.
- The Election Commission does not have an all-inclusive process in place to respond to the large volume of absentee ballot requests, which was the result of the Covid-19 pandemic.

¹⁰ US Election Assistance Commission: Chapter 11 – Contingency Planning and Change Management, www.eac.gov.

Recommendation 5: Conduct an election security review over the administration of election processes, including absentee ballots; and develop contingency and change management plans to identify, assess, and respond to events that may disrupt election processes.

Management should conduct an election security review, by performing a walk-through of election administration procedures, performing physical inspections, considering all aspects of security including local information systems security practices, possible threats, and vulnerabilities that may be identified. In addition, management should develop contingency and change management plans that address the Election Commission's response to emergency and crisis situations that might arise expectedly and unexpectedly.

Specifically,

Security Review:

- Review policies and procedures to ensure proper separation of job duties throughout the election administration process.
- Perform a risk assessment of election administrations to identify potential opportunities in the election administration process where election security and integrity is vulnerable to destruction, disruption, tampering, or corruption from internal or external sources.
- For each potential identified threat, list the potential security exposure and the impact on the election from each threat.
- Consider whether the likelihood of each threat is high, medium, or low and develop plans to mitigate or eliminate each threat starting with those considered high.
- Conduct an evaluation to identify lessons learned and issues and problems encountered in previous elections. Consider making this activity a part of the close out process for each audit as well as upcoming audits.
- Assess individual procedures used throughout the election administration process to determine whether revisions are necessary based on the outcome of the review.
- Perform a physical security review to assess access and controls of all office and storage facilities used in the election administration process.

- Consider evaluating disaster recovery, terrorism, pandemic (i.e. Covid-19), and weather-related; develop a plan to mitigate such risks. Consider involving relevant local and state enforcement agencies.

Contingency and Change Management Plans:

➤ **Set a goal that:**

- Provides prompt and effective responses to a crisis or emergency while preserving the integrity, transparency and accessibility of the election process.
- Prevents or minimizes any interruption in the election process during an emergency or crisis situation.
- Ensures rapid and complete recovery of the election processes to normal conditions following emergencies and disasters.

➤ **Define the purpose by:**

- Establishing policies and procedures for preventing and mitigating the effects of an emergency or crisis.

➤ **Specify objectives that:**

- Refers to the outcomes that support and help achieve the goals of the contingency plan and which are clear, measurable, achievable, realistic and time-bound.

➤ **Develop an action plan that:**

- Speaks to the established goal and objectives; each action step should relate back to a particular objective. The plan should also define the staff, budget, time, training needs and resources needed to accomplish the tasks and achieve the goal.

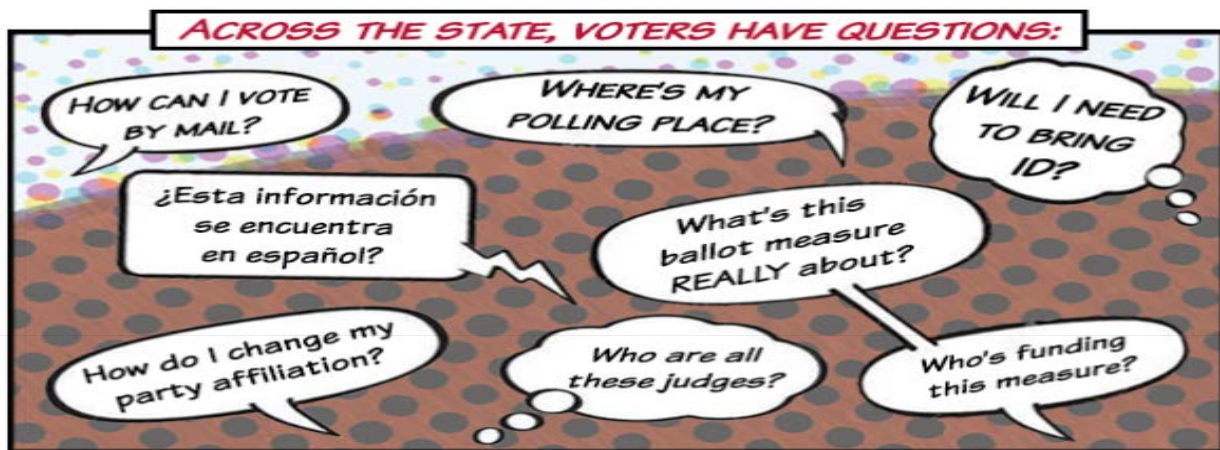
➤ **Implement the Action Plan by:**

- Assess the effectiveness of each action plan.
 - Evaluating opportunities for improvement.
 - Communicating the results of the assessment with staff, Election Commissioners, Council Members, the Mayor and other interested stakeholders engaging them in the process.
-

D. Voter Education and Resources

According to best practice, voter education is a term used to explain the dissemination of information, materials and programs designed to inform voters about the specifics and mechanics of the voting process for a particular election. Included in voter education is providing information on who is eligible to vote; where and how to register; how electors can check the voter lists to ensure they are registered; what type of elections are being held; and where, when and how to vote. In 2014, the EAC collaborated with local election officials to develop a series of helpful tips for election management (*see Appendix B*).

Figure 5: Voter Education



By: *League of Women Voters of Connecticut: Voter Education Resources*, <https://my.lwv.org/connecticut/voter-education-resources>

The goal to providing voter education is to create nonpartisan educational resources that can be used by the community and government agencies to educate members of the community on their role, rights and responsibility as a voter in the American system of government.

Appropriate voter education can be provided through various forms of communication and resources:

- Social media
- Printed materials
- Media forums (radio, television, etc.)
- In person

Sample activities to provide voter education on the when, where and how of voting, might be:

- Communications, events, video displays, classes or forums to:
 - Announce election dates and early voting period.
 - Remind voters of how to register online and voter registration deadlines.
- Assist voters in obtaining information on early voting or locating their polling site.
- Create partnerships with community organizations, high schools or community colleges and universities to provide voter education and registration.
- Launch short a video communicating various regarding the when, where and how of voting.¹¹

At its core, voter education should be designed in a way to ensure individuals are able, willing and ready to participate in an election. Information used to communicate voter education should aim to create a climate of knowledgeable participation by all potential voters in an upcoming election. It should also be designed in a way that enables any registered voter with confidence when casting their ballot whether it is in-person, by mail, early voting or absentee ballot.

Education on its own cannot sustain equality. However, educating individuals is one of the best ways to increase voter motivation and participation so that election results might better match

Testing of audit procedures concluded that communication efforts to educate voters on the proper methods to cast their vote by absentee ballot as well as other procedures required for receiving and returning an absentee ballot should be enhanced to election processes are fair, accessible and transparent.

Specifically,

- Some alderpersons were contacted by their respective constituents, during the April 7th Election, regarding non-receipt of an absentee ballot; the timeframe to wait before submitting a subsequent request for an Absentee Ballot, and assistance with obtaining an absentee ballot.

¹¹ Nonprofit Vote: Nonprofits, Voting Elections: A guide to Nonpartisan Voter Engagement, <https://www.nonprofitvote.org/nonprofits-voting-elections-online/voter-education>.

Recommendation 6: Enhance communication efforts to educate voters on the proper methods to cast their vote by absentee ballot and other procedures required for receiving an absentee ballot and returning the envelope to ensure their ballot is counted.

To ensure voters have access to information about voting by absentee ballot, Management should enhance the communication efforts to inform voters on the proper ways to cast their vote by absentee ballot.

Specifically,

- Revise an informational brochure with information on the various methods of voting by absentee ballot, including voting absentee ballot by mail. If permitted, consider including a copy of the absentee ballot application form as a “tear off return mail page” on the brochure. Make sure brochures are available at City Hall, libraries, etc. and consider distributing them at various speaking engagements, community events, registration drives, etc.
- Consider including information regarding the various aspects of voting by absentee ballot, including how to request a replacement ballot, as well as the qualifications and process to request a permanent absent ballot.
- Create an absentee ballot Frequently Asked Questions on the Election Commission’s website; social media pages, etc. to inform voters about how to ensure their ballot will be counted.

For example:

- Can I drop my voted absentee ballot at the polls on Election Day?
- What should I do if I don’t receive my absentee ballot?
- How long should I wait before I request a subsequent absentee ballot?
- I made a mistake on my ballot while voting. How do I get a new ballot?
- Will my ballot be counted if I mail it on Election Day?
- Consider providing local and state (if applicable) media with deadlines and requirements specific to absentee voting.
- Develop materials in formats accessible to voters with disabilities. Consider using resources and information on how to develop brochures, flyers, websites and other materials from:

- Access Board at <http://www.accessboard.gov>.
- Accessibility of State and Local Government Websites to People with Disabilities at <http://www.ada.gov/websites2.htm>
- Ensure all information is communicated in the appropriate alternative foreign languages.

Appendix A

	Wisconsin Application for Absentee Ballot						(Municipal Clerk) If in-person voter, check here: <input type="checkbox"/>	
	Absentee ballots may also be requested at MyVote.wi.gov							
	Confidential Elector ID# (HINDI - sequential #) (Official Use Only)				WisVote ID # (Official Use Only)			Ward No.
Instructions	<p>Detailed instructions for completion are on the back of this form. Return this form to your municipal clerk when completed.</p> <ul style="list-style-type: none"> You must be registered to vote before you can receive an absentee ballot. You can confirm your voter registration at https://myvote.wi.gov <p>! PHOTO ID REQUIRED, unless you qualify for an exception. See instructions on back for exceptions.</p>							
VOTER INFORMATION								
1	Municipality	<input type="radio"/> Town <input type="radio"/> Village <input type="radio"/> City			County			
2	Last Name			First Name				
	Middle Name		Suffix (e.g. Jr, II, etc.)		Date of Birth (MM/DD/YYYY)			
	Phone			Fax			Email	
3	Residence Address: Street Number & Name							
	Apt. Number			City			State & ZIP	
4	Fill in the appropriate circle – if applicable (see instructions for definitions): <input type="radio"/> Military <input type="radio"/> Permanent Overseas <input type="radio"/> Temporary Overseas							
I PREFER TO RECEIVE MY ABSENTEE BALLOT BY: (Ballot will be mailed to the address above if no preference is indicated. Absentee ballots may not be forwarded.)								
5	<input type="radio"/> MAIL	Mailing Address: Street Number & Name						
	<input type="radio"/> VOTE IN CLERK'S OFFICE	Apt. Number			City			State & ZIP
		Care Facility Name (if applicable)						
		C / O (if applicable)						
	<input type="radio"/> FAX	Fax Number		For Military and Overseas Voters Only			Voter must have a computer and printer when receiving a ballot by fax or email. Voted ballots must be returned by mail.	
<input type="radio"/> EMAIL	Email Address		For Military and Overseas Voters Only					
I REQUEST AN ABSENTEE BALLOT BE SENT TO ME FOR: (mark only one)								
6	<input type="radio"/> The election(s) on the following date(s): _____ <input type="radio"/> All elections from today's date through the end of the current calendar year (ending 12/31). <input type="radio"/> For indefinitely-confined voters only: I certify that I am indefinitely confined because of age, illness, infirmity or disability and request absentee ballots be sent to me automatically until I am no longer confined, or I fail to return a ballot. <i>Anyone who makes false statements in order to obtain an absentee ballot may be fined not more than \$1,000 or imprisoned not more than 6 months or both.</i> Wis. Stats. §§ 12.13(3)(i), 12.60(1)(b).							
TEMPORARILY HOSPITALIZED VOTERS ONLY (please fill in circle)								
7	<input type="radio"/> I certify that I cannot appear at the polling place on election day because I am hospitalized, and appoint the following person to serve as my agent, pursuant to Wis. Stat. § 6.86(3).							
	Agent Last Name				Agent First Name			Agent Middle Name
	AGENT: I certify that I am the duly appointed agent of the hospitalized absentee elector, that the absentee ballot to be received by me is received solely for the benefit of the above named hospitalized elector, and that such ballot will be promptly transmitted by me to that elector and then returned to the municipal clerk or the proper polling place.							
	Agent Signature		X		Agent Address			
ASSISTANT DECLARATION / CERTIFICATION (if required)								
I certify that the application is made on request and by authorization of the named elector, who is unable to sign the application due to physical disability.								
Agent Signature	X			Today's Date				
VOTER DECLARATION / CERTIFICATION (required for all voters)								
I certify that I am a qualified elector, a U.S. Citizen, at least 18 years old, having resided at the above residential address for at least 28 consecutive days immediately preceding this election, not currently serving a sentence including probation or parole for a felony conviction, and not otherwise disqualified from voting. Please sign below to acknowledge that you have read and understand the above.								
Voter Signature	X			Today's Date				

Wisconsin Application for Absentee Ballot Instructions

General Instructions: This form should be submitted to your municipal clerk, unless directed otherwise.

- This form should only be completed by registered voters; if you are not a registered voter or military elector, please submit a Voter Registration Application (EL-131) with this form.

Photo ID requirement: If you will receive your absentee ballot by mail, and have not previously provided a copy of acceptable photo ID with a prior by-mail absentee ballot request, a copy of photo ID must accompany this application. You may submit your application and a copy of your ID by mail, fax or email. In-person voters must always show acceptable photo ID.

The following documents are acceptable Photo ID (For specific information regarding expired documents visit <http://bringit.wi.gov>.)

State of WI driver license or ID card	Certificate of Naturalization
Military ID card issued by a U.S. uniformed service	WI DOT DL or ID card receipt
Photo ID issued by the federal Dept. of Veterans Affairs	Citation/Notice to revoke or suspend WI DL
University, college or tech college ID and enrollment verification	ID card issued by federally recognized WI tribe
U.S. passport booklet or card	

In lieu of photo ID, the voters listed below may satisfy the voter ID requirement by the following means:

- Electors who are indefinitely confined (see Section 6) – the signature of a witness on the Absentee Certificate Envelope.
- Electors residing in care facilities served by Special Voting Deputies – the signatures of both deputies on the envelope.
- Electors residing in care facilities not served by Special Voting Deputies – the signature of an authorized representative of the facility. If the elector is also indefinitely confined, the elector does not need a representative of the facility to sign.
- Military, Permanent Overseas and Confidential Electors – Exempt from the photo ID requirement.

1	<ul style="list-style-type: none"> • Indicate the municipality and county of residence. Use the municipality's formal name (for example: City of Ashland, Village of Greendale, or Town of Albion).
2	<ul style="list-style-type: none"> • Provide your name as you are registered to vote in Wisconsin. If applicable, please provide your suffix (Jr, Sr, etc.) and/or middle name. If your current name is different than how you are registered to vote, please submit a Voter Registration Application (EL-131) with this form to update your information. • Provide your month, day and year of birth. Remember to use your birth year, not the current year.
3	<ul style="list-style-type: none"> • Provide your home address (legal voting residence) with full house number (including fractions, if any). • Provide your full street name, including the type (eg., Ave.) and any pre- and/or post-directional (N, S, etc.). • Provide the city name and ZIP code as it would appear on mail delivered to the home address. • <u>You may not enter a PO Box as a voting residence.</u> A rural route box without a number may not be used.
4	<ul style="list-style-type: none"> • A "Military elector" is a person, or the spouse or dependent of a person who is a member of a uniformed service or the merchant marines, a civilian employee of the United States, a civilian officially attached to a uniformed service and serving outside the United States, or a Peace Corp volunteer. Military electors do not need to register to vote. • A "Permanent Overseas elector" is a person who is a United States citizen, 18 years old or older, who resided in Wisconsin immediately prior to leaving the United States, who is now living outside the United States <u>and has no present intent to return</u>, who is not registered in any other location, or who is an adult child of a United States citizen who resided in this state prior to establishing residency abroad. Permanent Overseas electors will receive ballots for federal offices only and must be registered to vote prior to receiving a ballot. • A "Temporary Overseas elector" is a person who is a United States citizen, 18 years of age or older, a resident of Wisconsin and is overseas for a temporary purpose and intends to return to their Wisconsin residence.
5	<ul style="list-style-type: none"> • Fill in the circle to indicate your preferred method of receiving your absentee ballot. • Military and Permanent Overseas voters may request and access their ballot directly at https://myvote.wi.gov. • If no preference is indicated, your absentee ballot will be mailed to your residence address listed in Box 3. • You are encouraged to provide a physical mailing address as backup in case of electronic transmission difficulties. Please only fill the circle for your preferred means of transmission. • If you are living in a care facility, please provide the name of the facility. • If someone will be receiving the ballot on your behalf, please list them after C/O. <u>Please note:</u> The absentee elector is still required to vote their own ballot, although they may request assistance in physically marking the ballot.
6	<ul style="list-style-type: none"> • Select the first option if you would like to receive a ballot for a single election or a specific set of elections. • Select the second option if you would like to have a standing absentee request for any and all elections that may occur in a calendar year (ending December 31). • Select the third option only if you are indefinitely confined due to age, illness, infirmity or disability and wish to request absentee ballots for all elections until you are no longer confined or fail to return a ballot for an election.
7	<ul style="list-style-type: none"> • This section is only to be completed by an elector or the agent of an elector who is currently hospitalized. • An agent completing this form for a hospitalized elector must provide his/her name, signature and address on this application.
Assistant Signature:	In the situation where the elector is unable to sign the Voter Declaration / Certification due to a physical disability, the elector may authorize another elector to sign on his or her behalf. Any elector signing an application on another elector's behalf shall attest to a statement that the application is made on request and by authorization of the named elector, who is unable to sign the application due to physical disability.
Voter Signature:	By signing and dating this form, you certify that you are a qualified elector, a U.S. citizen, at least 18 years old, having resided at your residential address for at least 28 consecutive days immediately preceding this election, not currently serving a sentence including probation or parole for a felony conviction, and not otherwise disqualified from voting.



7 TIPS

To Strengthen Voter Education Programs

The U.S. Election Assistance Commission has collaborated with local election officials to develop a series of helpful tips for election management. This series provides tips and suggests best practices to help you run efficient and effective elections.

Voter education programs impact voter turnout. Well-planned programs can motivate and encourage citizens to participate in the voting process. Try these seven tips to help strengthen your voter education efforts.



1 Understand Your Voters

Use data to guide your approach to planning voter education efforts. The more you know about your voters, the more effective your approach will be.

Gain insight into voters by gathering and reviewing data from past elections on:

- Undervotes.
- Spoiled ballots.
- Errors on provisional ballots.
- Absentee voting by precinct.

REMEMBER

Different voters have different learning styles. Understand how to best reach your voting public—

- Web site.
- Social media.
- Print.
- Radio.
- TV.
- In person.

Quick Clicks

Voter satisfaction survey example: www.berncogov/clerk/

Voter education Web site example: <http://vote.minneapolismn.gov>

2 Keep Your Web Site Current

Review and evaluate your Web site frequently. Keep it fresh and accessible.

Elements that can make Web sites user friendly:

- Create a clean, simple, visually appealing presentation. Avoid crowding content with too many graphics and photographs.
- Write in plain language.
- Create a prominent front-page link to frequently asked questions (FAQs).
- Highlight the FAQs of most interest to voters.



- Tip 6 continued**
- Voting dates, hours, and times.
 - Sample ballots.
 - A voter guide.
 - Absentee and vote-by-mail options.
 - Assistance available to voters at the polls.
 - Contact information for your help desk and staff.
 - Your Web site address.
 - Your Facebook and Twitter account names.

REMEMBER



Each election is unique. In your toolkit, account for consolidated-precinct, local, state, and national elections.

Quick Click

Voter toolkit example:
www.miamidade.gov/elections/

Coordinate Education Across Platforms



You can deliver many voter education tools in several different formats.

Tips for reaching as many voters as possible:

- Provide your voter toolkit online and in brochure format.
- Deliver regular newsletters featuring timely articles and voter-relevant deadlines via print, e-mail, social media, and mobile app.
- Remind voters of upcoming dates via e-mail, Twitter and Facebook posts, and mailings.
- Provide electoral district maps and maps with driving directions to polling places on your Web site through mobile apps. Link to mapping software on all platforms.
- Offer demonstration or educational videos on how to vote, how to use technology, and how your office makes the election results secure and accurate. Upload these presentations to YouTube and other electronic outlets.

Quick Clicks

Election app example:
<http://www.longbeach.gov/cityclerk/elections/>

Facebook, Twitter, and e-newsletter example:
www.hernandovotes.com

Voting system and paper ballot demonstrations on the Web:
www.mohavecounty.us/ContentPage.aspx?id=118

www.hancockboardofelections.com

www.scottcountyiowa.com/auditor/your_ballot.php

Previous EAC Quick Start Guides:
http://www.eac.gov/assets/1/workflow_staging/Page/247.PDF

<http://www.eac.gov/assets/1/AssetManager/Quick%20Start-Serving%20Voters%20in%20Long-Term%20Care%20Facilities.pdf>

REMEMBER



Use mobile apps to announce wait times at vote centers and early voting sites.





Election Commission

Commissioners
Stephanie Findley
Carmen Cabrera
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Executive Director
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September 28, 2020

Subject: Findings of the Election Commission Administration of Absentee Ballot

Dear Inspector General Kohlheim:

The City of Milwaukee Election Commission appreciates the opportunity to work with the Inspector General's Office regarding our administration of absentee ballots. This audit was conducted directly after an unprecedented Spring Election where the department witnessed a 1,000% increase in requests for absentee ballots due to the COVID19 pandemic. This period does not reflect, in any function or capacity, standard operations for the department. Rather, amidst preparation for what is historically a very high turnout Spring Election/Presidential Primary for the city, the department was confronted with the following additional challenges:

- A workplace wrought with fear, driven by the rapid spread and health uncertainty of the pandemic
- Due to both realities and perceptions of risk, an evaporating workforce of temporary office workers and Election Day election workers.
- Severe shortages of critical voting supplies, including PPE for use at the workplace and at voting sites
- Reliance on a statewide voter registration database that was not designed for the rapid shift to by-mail voting
- A near shutdown of city services and community resources that have traditionally been resources available to voters experiencing hardships

Despite these challenges, it should be noted that staff of the Election Commission remained steadfast in their dedication and did nothing short of a remarkable job of administering an election during some of the most dire circumstances in history.

Election administration policies and procedures have quickly adapted at both a state and local level due to this shift in voting behaviors. My response to the report's recommendations reflect this quickly evolving landscape:

Recommendation 1: Develop a well-defined Absentee Ballot Training Manual to outline systems Absentee Ballot procedures.

The Election Commission shares the report's desire to have a comprehensive manual of all processes and procedures related to absentee voting. As noted in this audit, the department is also in full agreement that election laws, administrative rules and election data systems change with significant frequency. It has been this department's goal to operate within this environment with the greatest level of efficiency and accuracy and to avoid a duplication of resources (training manuals) made readily available to Municipal Clerks across the state through the Wisconsin Elections Commission. A majority of the processes and procedures outlined already exist in the WisVote (statewide voter database) manual, as well as in the Special Voting Deputy



manual. Additionally, some processes distinguished by the Inspector General such as how to process an absentee request if it is received via email versus via mail versus via fax are all identical and indistinguishable in process. Many absentee processes and procedures have changed throughout 2020. The Wisconsin Election Commission (WEC) has completely transformed the WisVote database, the Special Voting Deputy program has been suspended, and the City of Milwaukee has adopted new mailing procedures. These new processes and procedures will need to be reviewed and incorporated into a comprehensive manual going forward. While certainly feasible, an attempt to replicate these resources in order to establish “in-house” training manuals would be an inefficient use of limited resources and could also lead to inaccuracies due to rapidly changing information.

Completion Date: Summer of 2021 will provide Election Commission staff the time to update processes and procedures into a comprehensive Absentee Ballot Coordinator manual. However, updates to this manual will be ongoing as election law and the election landscape continue to change.

Recommendation 2: Strengthen control procedures to prevent, detect and correct identified system errors, failure to fulfill an absentee ballot request and to ensure the fulfillment of all absentee ballot requests are in compliance with applicable regulation.

The Election Commission does identify a significant value in enhancing reconciliation systems that confirm absentee ballot requests received correlate to absentee ballots sent to voters. However, the department is not in full agreement with the portrayal of data provided in this finding, particularly the statements that “there were over 2,600 absentee ballot requests that were never issued to the registered voter” and “Absentee ballots requested by voters March 22nd and March 23rd were not delivered” The context of these statements implies a deficiency in the Milwaukee Election Commission’s absentee ballot processes. Rather, the deficiency was rooted in a server failure at the Wisconsin Election Commission that compromised the statewide voter registration database. A failure that even by the WEC’s own admission could not be identified or traced by local clerks. This was due to a database issue that was beyond the control of the Milwaukee Election Commission. As stated in the Wisconsin Election Commission’s May 20, 2020 report:

“The single failure identified came to light after the City of Milwaukee’s Election Commission (MEC) conducted a post election review that could only be identified after election participation was entered. Upon investigation, MEC staff discovered that the WisVote record for tracking this voter’s ballot had been created in the middle of the night, at a time when MEC staff would not have been creating ballot records. They further determined that the ballot record was associated with a batch. A batch is a WisVote entity that allows clerks to select broad categories of absentee application records and request the system create ballot tracking records and subsequently generate mailing labels for each of those absentee applications. Many of the absentee ballots associated with this batch had been created in the middle of the night, and many of them had not been returned. MEC referred the issue to the WEC for further investigation during the post-election data reconciliation process...

As a result of this issue, staff believes that 2,693 requested ballots were never sent to City of Milwaukee residents. Of the affected voters, 52.5% voted in the election either on a replacement absentee ballot or at the polls on election day.

Ensuring the voting rights of Wisconsin citizens is a hugely complex task without room for error. It requires, at a minimum, the ability to immediately identify and remedy errors before they affect the voting process. In this instance, detailed records enabled agency staff to retrace these events, they did not provide information in a proactive manner allowing a system problem to be identified in real time. *Neither clerks nor the state would have been able to identify this issue in real-time or based on single voter reports.* [emphasis added] Staff are now adopting real-time performance tracking tools for IT professionals and building user-friendly audit tools for clerks and other election officials.”

The Milwaukee Election Commission is required by state law to issue and track ballots within the statewide voter database, WisVote. The department follows all state-recommended practices and procedures to ensure our data is accurate. As the WEC stated, the error identified was outside of the Milwaukee Election Commission’s control, and we were following all prescribed protocols at the time. Since April of 2020, in consultation and constant communication with the Milwaukee Election Commission, the WEC has made vast improvements to the database and how it processes absentee ballots, as well as tracking procedures such as the utilization of intelligent mail barcodes on outgoing ballots. At the same time, the Milwaukee Election Commission has also found ways to make improvements such as using an envelope printer and folder/insert machine for assembly to eliminate manual labor and improve accuracy.

Completion Date: The Milwaukee Election Commission will continue to monitor and advocate for changes that are needed within the WisVote database, as it was our diligence in analyzing data within the system that caught the error from April of 2020.

Recommendation 3: Eliminate the use of City’s third-party mail service vendor and implement a process to create checkpoints for Absentee Ballots from the time it leaves the Election Commission, to confirmation of receipt to the U.S. Postal Service, to delivery to the voter.

The Election Commission has already eliminated the use of the third-party mail service vendor starting with the November 2020 election. Furthermore, we are in frequent communication with our USPS partners regarding proper procedures and protocol for permit imprinted mail deliveries. The Wisconsin Election Commission (WEC) oversees the intelligent mail barcode (IMB) creation for each absentee ballot. We continue to advocate to the WEC for text and email alerts to voters as their ballot hits different milestones or mile markers within the USPS delivery system.

Completion Date: Completed the transition in September of 2020.

Recommendation 4: Develop, implement and document internal controls over the security and storage of all election related equipment, supplies and documentation, including absentee ballots.

The Election Commission has already implemented many of the recommended practices. A detailed chain of custody is documented for the transfer of all absentee ballots from a drop box or City Hall to the secure warehouse facility. Access to the Election Commission's warehouse has been removed for any non-election personnel (the facility was previously shared with Water Works). All absentee ballots are kept in a centralized, locked location within the warehouse that has 24 hours video surveillance.

Completion date: This recommendation was implemented in the summer of 2020 and further updates will be added into the comprehensive Absentee Manual during the summer of 2021.

Recommendation 5: Conduct an Election Security Review over the administration of Election processes, including Absentee Ballot and develop Contingency and Change Management Plans to identify, assess, and respond to events that may disrupt Election processes.

The Election Commission maintains an election contingency plan that is updated annually. The executive director also remains in regular contact with the director of emergency management, the Southeastern Wisconsin Threat Analysis Center, Milwaukee Police Department and the Milwaukee County District Attorney's office regarding election security and safety. Further, our entire staff has participated in election security tabletop exercises (TTX) hosted by the Wisconsin Election Commission. These TTX trainings have been recognized in the election administration world as being innovative and providing clerks with real world, time sensitive issues to consider when creating contingency plans. As a result of the WEC's and the Milwaukee Election Commission's dedication to contingency planning, the department was able to complete the following critical steps with regard to absentee voting during the April 7 Spring Election:

- Key staff of the Milwaukee Election Commission joined with lead system staff at the WEC to develop a model for expediting the data entry piece of the absentee request process. This collaborative development of this model led to the near-immediate dissolve of any wait time for the processing of requests. Prior to the creation of this upgrade to the database, ITMD was extremely responsive in providing the Election Commission with six high-speed desktop printers so that the office could better manage printing thousands of applications and photo IDs.
- To help abate the possibility of running out of absentee envelopes, the department maintains a pre-purchased inventory of appropriate envelope stock with a vendor. Staff completed an immediate inventory of all absentee voting related supplies and submitted a request for printing on this reserved envelope stock. A one-day delay with the printer led to the department running out of envelopes for a 24-hour period. As witnessed in other municipalities, this delay would have been much more significant had the department not planned and pre-purchased envelopes or completed an immediate supply inventory.
- The department quickly established five absentee ballot drop-box locations across the city so that persons returning their absentee ballots could bypass an additional potential

mail delivery delay. These locations were staffed with election workers who distributed additional absentee ballot applications, provided witness signatures, and responded to questions. Expanded drop-off sites were considered, however there was an insufficient number of election workers available to staff these sites due to health and safety concerns.

- The department conducted near-daily media briefings with regard to absentee voting as well as disseminating information through social media.
- The Election Commission has a previously established “back up” relationship with the Unified Call Center (UCC) to assist with managing high volumes of calls, including during periods of emergency. With support from the Department of Administration, this relationship was expanded to allow all calls to be routed through the UCC, with trained call responders from various departments within DOA and Budget working from home. Staff provided a virtual training for these call responders via Zoom, as well as provided a FAQ and sample scripts for incoming calls. Calls requiring greater knowledge were triaged to staff of the Election Commission.
- The Election Commission began an immediate process of recruiting non-essential city workers from other departments and providing virtual training opportunities that rapidly built the department’s data entry workforce and allowed the process to occur in scattered satellite locations in City Hall or from individual’s home. This process occurred without compromising cybersecurity protocols.
- When the anticipated mail delivery time had passed, the Election Commission began immediately re-issuing ballots for voters reporting that they had not received their ballot. The department resent approximately 1,005 ballots from this period.
- Rapidly shifted from a model of in-person absentee “early” voting to drive-up “early” voting.

Completion Date: In summer of 2021, all staff will engage in strategic planning, which will include contingency and change management plans.

Recommendation 6: Enhance communication efforts to educate voters on the proper methods to cast their Vote by Absentee Ballot and other procedures required for receiving an Absentee Ballot and returning the envelope to ensure their ballot is counted.

Prior to 2020, the Election Commission worked with the City Clerk’s graphic designer to create educational materials around voting, including the absentee process. These materials include a comprehensive, easy-to-understand trifold brochure, as well as buckslips and door hangers that were distributed by Water Works and community organizers.

In 2020, we have solicited the assistance of a marketing firm to transition from a traditional education campaign to a digital education campaign due to the pandemic. The Election Commission will begin to use social media more extensively, as well as have a new website at Milwaukee.gov/414votes. The new website will be entirely voter education-focused. It will enable us to create and share videos, provide an outreach toolkit to community partners, as well as structure information in a more user-friendly manner than the traditional department page template. The slogan of the Election Commission’s campaign is “Votes Count in the 414,”

emphasizing Milwaukee's important role in state and national elections, as well as assuring the public of the integrity of the election and assuring them that their votes will be counted.

Completion date: This recommendation was already in existence and continues to be improved upon in 2020.

Sincerely,



Claire Woodall-Vogg
Executive Director