

Wisconsin Elections Commission

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DATE: March 19, 2025

TO: Wisconsin Municipal Clerks

City of Milwaukee Election Commission

Wisconsin County Clerks

Milwaukee County Election Commission

FROM: Wisconsin Elections Commission

SUBJECT: Election Security Updates

1. **Purpose.** This memorandum provides an update regarding recent funding cuts for election related services supported by the Department of Homeland Security's (DHS) Cybersecurity and Infrastructure Security Agency (CISA). Specifically, all federal funding was cut for the Election Infrastructure Information Sharing and Analysis Center (EI-SAC) and Multi-State Information Sharing and Analysis Center (MS-ISAC) on March 6, 2025.

Not all Wisconsin municipalities or counties are members of the EI-ISAC or the MS-ISAC as enrollment is voluntary. Many small Wisconsin jurisdictions are not currently members. Therefore, this information may not directly affect to your jurisdiction.

- 2. **Background.** MS-ISAC and EI-ISAC are Information Sharing and Analysis Centers that have routinely provided support to critical infrastructure sectors. They exist to protect the facilities, employees, and customers of critical infrastructure organizations. In addition, ISACs collect information from member organizations, analyze the information collected, and disseminate threat information to their member organizations along with recommended tools to mitigate the risk of any given threat. Most ISACs are concerned with more than just cybersecurity or physical security alone; rather, they take an all-hazards approach, including all types of emergencies. By design, ISACs are not federal government organizations but operate in the private sector, usually under the direction of nonprofit companies. Until recently EI-ISAC/MS-ISAC were the only ISACs that received federal funding.
- 3. **EI-ISAC/MS-ISAC Updates.** On February 19, 2025, DHS announced the immediate termination of federal funding for all election-related activities, including personnel and EI-ISAC services. The Center for Internet Security (CIS), which administers both the MS-ISAC and EI-ISAC, indicated that it would continue to support EI-ISAC functions under the MS-ISAC framework. However, on March 6, 2025, DHS further notified partners of the immediate termination of funding for specific MS-ISAC tasks, such as threat analysis and distribution, incident response, and various member services (including webinars, training, and both virtual and in-person meetings). Essential services such as Albert, Malicious Domain Blocking and Response (MDBR), Endpoint Detection and Response (EDR), Nationwide Cybersecurity

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Review (NCSR), and Security Operation Center (SOC) operations will remain unaffected. CIS has confirmed that these services continue uninterrupted while it explores how to support this work without federal funding.

There's a good chance your jurisdiction simply receives informational updates from the EI-ISAC and no actual services. Many of the services that EI-ISAC offers are services that most Wisconsin municipalities obtain from their own IT support or internet service provider.. However, some counties may have an Albert sensor through the MS-ISAC that benefits your entire county network, not just areas related to elections. Please consult with your IT and legal department if you have concerns about the continued use of Albert sensors.

- 4. **Considerations.** As clerks review ongoing services provided by CIS, it is advisable to consult with local counsel regarding the constitutional amendment on election administration to ensure compliance with and address any legal concerns. See Wis. Const. art. III, § 7(2). The Wisconsin Attorney General also provided an opinion in 2024, clarifying the impact of the constitutional amendment. While reviewing ongoing services, consider alternatives to safeguard against possible future disruptions in service offerings.
- 5. **Questions.** Please direct questions about this clerk communication to <u>elections@wi.gov</u> or call the Help Desk at 608-261-2028.

 $^{^1\,}https://docs.legis.wisconsin.gov/misc/oag/recent/oag_1_24$