NOVEMBER GENERAL ELECTION

STATUS REPORT

Prepared for the September 11, 2024 meeting of
the Wisconsin Elections Commission

Contents

November General Election Status Report

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Executive Summary

Based on turnout in previous Presidential Elections, more than 3 million eligible Wisconsin voters are likely to participate in the 2024 November General Election.

The Wisconsin Elections Commission (WEC) and local election officials have been preparing for this key moment since the day after the 2020 General Election, while simultaneously planning for and administering every local and state election in the interim.

At the WEC, we share the responsibility to train local election officials and support the administration of Wisconsin elections, which are run by each of the state's approximately 1,850 city, village, and town election officials. It is these local officials who register voters, issue absentee ballots, recruit and train poll workers, and plan for safe voting. There are 72 county election officials who prepare and print ballots and secure their websites for Election Night results. Local and state election officials also share the responsibility to provide the public with factual, up-to-date information about how our elections work. Additionally, in November there will be nearly 2,500 polling places requiring more than 30,000 poll workers.

Running a fair, accurate, and transparent General Election requires each of these players, in addition to the active participation of Wisconsin citizens, to diligently complete their role in the process. This report offers extensive details about how the Wisconsin Elections Commission has prepared for the November General Election.

Wisconsin election officials have already successfully administered three elections in 2024: the February Nonpartisan Primary, the April Spring Election and Presidential Preference election, and the August Partisan Primary.

Each election is an opportunity for the Commission to analyze processes and assess opportunities for improvement. We have been carefully planning for the 2024 election cycle through updating systems and processes within the parameters of the law. These include cybersecurity initiatives, development of training for Wisconsin's local election partners, renewed attention to voter usability, and public information sharing on the mechanics of democracy.

In brief, the Commission and staff have accomplished important tasks across all agency areas of responsibility:

Internal Agency Planning

- Surveyed and closely communicated with local election officials regarding how the WEC can best support them.

Election Official Training

- Launched an updated system for local election officials to take and track training.

- Provided a variety of in-person and virtual training sessions for clerks.

- Updated key election administration manuals to comply with new best practices and changes in the law.

Statewide Voter Registration Database Preparation

- Upgraded the platform for the statewide voter registration system, allowing the WEC's systems to receive necessary updates and security patches as soon as they become available.

- Implemented Wisconsin's new political maps in the statewide voter registration system

- Conducted a statewide review of adjudicated incompetent records in the statewide system and prompted clerks to determine any active, registered voters needing to have their registration revoked due to incompetency adjudication.

- Continuously monitoring the statewide voter registration system for data quality and to flag voter records needing to be acted upon by local clerks, such as voter records needing to be deactivated due to death of the voter or a felony conviction.

MyVote Update

- Improving usability and security of MyVote Wisconsin site, such as through adding information on MyVote about requirements for overseas and military voters.

Accessibility Program

- Prepared to review 95 polling places in November to ensure compliance with voter accessibility requirements.

- Developed additional resources to assist clerks in understanding accessibility requirements.

Security Preparations

- Maintained continuous contact with state and federal law enforcement partners to ensure the WEC and law enforcement are aware of the latest security landscape and prepared for any contingencies.

- Offered local clerks security and cybersecurity trainings and online modules.

- Prepared to audit the performance of electronic voting equipment in 10 percent of reporting units statewide following the Nov. 5 General Election.

Absentee Envelopes

- Launched an updated absentee application/certification, mailer envelope and uniform instructions designed to improve usability of the envelopes, reduce the frequency of common mistakes, and improve visibility in the postal system.

Election Subgrants

- Authorized more than $13 million in federal funds to be directed to Wisconsin municipalities and counties to improve election administration at the local level.

Voter Outreach

- Maintained a robust and ongoing series of educational and media appearances by the agency administrator.

- Preparing communications toolkits and templated social media posts for clerks.

- Planning to launch a media campaign focusing on informing Wisconsin residents about voter education resources, including where to go to register to vote.

Customer Service

- Conducted preparations to ensure staff are prepared to respond to tens of thousands of calls and emails from voters, clerks, and others ahead of November.

Legislative Audit Bureau Report

- Following Commission and/or staff action, the 30 recommendations contained within the Legislative Audit Bureau's 2021 election administration report are either in progress, complete, sustained, or have been superseded by legislation or litigation.

We welcome all Wisconsinites to review the contents of our detailed readiness report to see for themselves why we can say election officials are fully prepared to conduct a successful November General Election.

Thank you,

Wisconsin Elections Commission members and staff

Internal Agency Planning

As staff prepared for the challenges of the 2024 election cycle, a variety of initiatives and planning efforts have been put in place to ensure comprehensive support for clerks and election officials across the state. This section of the readiness report highlights specific internal strategies, such as a clerk survey, collaboration with local election officials, and staff-focused training sessions. These efforts are integral to the broader planning and coordination covered throughout this report, with additional areas of focus detailed in other sections.

Clerk Survey

In late 2023, staff sent a survey to clerks intended to gather insights into clerks' work environments, experience levels, and election expertise to better tailor support for the 2024 election. Understanding the unique challenges faced by different municipalities – whether small or large, rural or urban, or managed by new or long-term clerks – enabled the WEC to create targeted resources and training programs. The survey results revealed that clerk experience varies greatly, with 37% of respondents stating they have over 10 years of experience in their role and 25% reporting less than 2 years, highlighting the need for both foundational and advanced training. Clerks emphasized the importance of practical guidance, especially on technology and complex voter scenarios. Smaller jurisdictions often face resource challenges, requiring tailored support to ensure consistent election administration statewide. Survey feedback also underscored the need for simplified tools, clear communication, and ongoing collaboration, all of which have been included in staff's support to clerks for the 2024 General Election.

Local Election Official Feedback

Wisconsin's structure for administering elections is unique. While most other states administer elections at the county level, Wisconsin runs elections at the municipal level, with the counties playing a critical supporting role. Wisconsin has 1,849 municipal election officials and 72 county election officials whose jurisdictions vary greatly in size and in access to resources. The WEC is tasked with creating training, building technology, and communicating with each election jurisdiction regardless of their size and access to resources. The needs of each jurisdiction are unique, and WEC

staff recognizes that the only way to build effective training, technology, and communications tools for local election officials is to involve them in each step of the process and to value and incorporate their feedback.

WEC staff regularly meets with the leadership and membership of the Wisconsin County Clerk's Association and Wisconsin Municipal Clerk's Association. At these meetings, WEC staff share information such as recent developments on agency projects, litigation updates, and upcoming Commission agendas and draft materials. We also regularly discuss WEC products, such as the bi-weekly clerk newsletter, to make sure the efforts are relevant and useful to local election officials. Staff specifically request feedback from clerks at these meetings to ensure that all the different levels of local election officials are aware of current WEC initiatives and projects and that the WEC-led initiatives and projects are as useful as possible to all local election officials. In addition, the feedback serves as an opportunity for local election officials to provide WEC staff with ideas for future projects or developments on current initiatives.

Internal Staff Training

In 2022, the WEC staff began offering internal professional development opportunities for staff on a regular basis. The original intent of the sessions was to acquaint the wider staff with technical functions unique to WisVote, but training has since expanded to cover nearly every agency function. In 2024, staff increased the frequency of training opportunities to cover more topics and thus cross-train more of the agency in different subjects. Recent topics include the Badger Book ePollbooks, nomination paper processing, addressing and districts, municipal clerk duties, and a refresher on common absentee-related topics. Training events are strategically scheduled so they are as relevant as possible when being presented.

Staff has also utilized security trainings from the Cybersecurity and Infrastructure Security Agency (CISA) on topics such as password management, how to prevent phishing attempts, de-escalation techniques when working with members of the public, and more.

Election Official Training

Introduction

The WEC's election official training programs effectively prepare local officials to administer accurate, free, fair, and secure elections. As with other election functions, the WEC's training programs must be tailored to accommodate the nation's largest and most decentralized audience of election jurisdictions.

Ahead of the 2024 General Election, WEC staff applied three approaches to maximize training effectiveness. First, the staff created – and continues to create – all-new training tools for election officials from the county level to the state level. Election training is offered in more formats than ever before in Wisconsin, ensuring accessibility to the widest possible range of needs. Second, training programs offered statewide are multidisciplinary, to meet the broad range of needs in both larger cities and small towns. Third, training programs are designed to be enduring resources and not merely one-time activities, available to both new and veteran clerks alike.

Election training is available in more formats than ever

The gold standard for training remains in-person, hands-on instruction, and the WEC is committed to maintaining this option for many training needs. In-person training offers direct engagement with the learner and the opportunity for immediate feedback on the learning process. In-person events scheduled ahead of the 2024 General Election included more than 25 Badger Book ePollbook training regional training events, over a half-dozen tabletop exercises, and many conferences and speaking events with municipal clerks, county clerks, law enforcement groups, IT professionals, and other government agencies. Many of these trainings took place in various parts of the state to encourage as much geographic participation as possible. Much of the training conducted in 2024 focused on fundamental processes, in part due to the significant number of relatively new clerks in Wisconsin.

The next most impactful training approach available to local officials is an all-new learning management system called ElectEd. A learning management system is a multifunction software application to administer, track, deliver, document and report training programs, materials, or coursework. The system therefore offers a one-

stop training destination that is available 24/7 so a learner can access it when it is most convenient to them. With the launch of ElectEd, clerks, their staff, and poll workers have access to hundreds of training tools created by Commission staff. Users may also find and register for upcoming in-person and live training events in the Calendar.

For added value, ElectEd was designed so clerks may administer training to their employees (including poll workers) and monitor progress. This allows clerks to both leverage the conveniences of online training, manage their staff, and ensure compliance. Poll worker management tools are some of the more popular features in ElectEd, especially for smaller jurisdictions without the resources available to a large city.

In addition to ElectEd, more conventional forms of remote and recorded training continues to be made available to local officials. These include Zoom webinar recordings, federal government training webinars produced in coordination with WEC staff, and remote coursework such as the University of Wisconsin Green Bay's Clerks Institute. These webinars and similar one-time training events are typically designed around a single topic or set of related topics. Additionally, staff will offer some "open webinars" where election officials may engage in Q&A with

our staff. Finally, post-election training will focus on post-election tasks and common post-election questions and concerns.

Election training is offered in more formats than ever before in Wisconsin

Written materials offer local officials yet another tool for self-study and reference material ahead of the 2024 General Election. At the direction of the Commission, this year staff updated two of the most frequently used guides: the Election Administration Manual and the Election Day Manual. Every proposed revision was examined and voted on in a public meeting by the six person, bi-partisan Commission. The approved, revised manuals were posted to electons.wi.gov and on ElectEd, our new Learning Management System, to provide easy access for clerks.

The wide variety of options described above ensure that local officials can choose the resources that best meet their needs, in the format that best meets the needs of the learner. This helps ensure that essential election training resources are delivered to those who need them most, particularly in light of the large number of clerks new to elections.

Election training is multidisciplinary

The Commission's election training resources cover election administration, all election administration systems, and a full spectrum of election security considerations. The multidisciplinary nature of the available training modules ensures that local officials have the tools to manage essential tasks, before, during, and after Election Day.

Basic election administration training covers contests, candidates, electors, polling places, canvass proceedings, and more. Training materials explain statutory deadlines and the administrative processes necessary to administer elections in accordance with the law. As noted above, significant updates to the Election Administration Manual and Election Day Manual ensured that clerks have the latest guidance ahead of the 2024 General Election.

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Election security planning encompasses an all-threats approach designed to prepare learners to face nearly any plausible contingency

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Jurisdictions using WisVote, the state's voter registration and election management system, have access to additional coursework and resources that empower them to manage their voter records, track absentee ballot records, and to make use of the system's powerful tools to keep voters informed about their polling places, ballot, voting record, and more. Likewise, Badger Book jurisdictions have access to special resources for Badger Books.

Election security forms the third element of the Commission's training programs. Election security is its own multidisciplinary topic, as security planning encompasses an all-threats approach designed to prepare learners to face nearly any plausible contingency, and not merely one or two specific threats. Election security was once focused largely on cybersecurity, but now includes physical security, and contingency planning generally. Significant partners in the election security space include Wisconsin Emergency Management, the Wisconsin Department of Military Affairs, the U.S. Cybersecurity and Infrastructure Security Agency, and numerous federal, state, and local law enforcement agencies. Many of these partners have provided instructors and training materials to the WEC, allowing the Commission to offer local officials subject matter expertise beyond the levels organic to the agency.

Election training is a continuous process

Wisconsin elections training materials are continually updated, and the latest information is continually routed to local election officials as the November General Election approaches. With few exceptions, Wisconsin's election training materials are designed to be enduring resources and not merely one-time activities. These materials are further supplemented by several communication tools designed to reach clerks in a variety of ways.

The WEC uses published Clerk Communications to ensure local officials have the latest Commission directives, legislation, and litigation. These updates, which are posted online and may also be delivered through email, ensure that local officials are current with information and ready to implement any changes that may need to occur in election procedures. The agency's website, elections.wi.gov, hosts a Clerk's landing page based on what clerks themselves identified as the most frequently accessed items. In addition to the Clerk Communications, all elections manuals are accessible on the site, and clerks may also navigate directly to ElectEd. Finally, older communications and content are now flagged with a notation identifying them as potentially out of date, so users can easily identify when newer guidance is available.

While not exclusively for training, a WEC newsletter also serves as a resource to keep the elections community informed, recognize clerks, and highlight key dates and deadlines. The newsletter is not intended to replace any training tool or communication, but instead merely supplements and reinforces information already available elsewhere. The newsletter is published online and emailed to clerks.

Finally, the ElectEd system provides convenient, on-demand access to all completed training materials, ensuring that even the most experienced officials can always return to access previous coursework. In addition to the interactive training modules, ElectEd also serves as a repository for useful resources like checklists, handbooks, and flowcharts.

Conclusion

The diverse, multidisciplinary, and enduring training programs offered by the Commission ensure that local election officials are well-prepared to administer all elections, including the November General Election, with accuracy, fairness, and security.

Statewide Voter Registration Database Preparation

The WEC develops and maintains a comprehensive system of election tools to facilitate statewide election administration. At the core of this system is WisVote, the platform that houses the statewide voter registration database and supports various election-related processes.

WisVote is an end-to-end election administration system used by over 2,500 municipal and county clerks, along with their authorized designees. It ensures that the voter registration list is kept current and compliant with legal statutes by storing active voter registrations and historical records of voter moves, names changes, and participation. The system is used to issue, track, and receive absentee ballot records, ensuring that only one ballot is counted per eligible voter. Additionally, WisVote generates poll books – both traditional paper and digital versions for those jurisdictions using Badger Books – based on voter registration records, absentee information, voter ineligibility data, and address details, ensuring that voters receive the correct ballot for their assigned districts and wards.

In addition, several other WEC-developed applications are integrated into WisVote to provide enhanced functionality. MyVote is a public-facing web application that allows voters to locate their polling places, request absentee ballots, and register to vote. Badger Voters is another public-facing application that enables voters to easily request publicly available data from WisVote. Finally, Badger Books is an electronic poll book that integrates with WisVote to prepare poll books and record voter participation. The WEC staff, in collaboration with clerks, carefully maintain these systems and have made extensive preparations to ensure they are fully operational for the November election.

System Development

(1) Testing and Platform Preparation:

Preparations to WisVote for the 2024 election cycle began in May 2023 with an upgrade to the platform for the voter registration system. Upon performing these upgrades, WEC systems are now positioned to more quickly receive necessary updates and security patches as soon as they become available. WEC staff spent the summer of 2023 performing a full regression test of the system by testing every functionality in the WisVote system and its integration points with related applications and other government databases, such as the Division of Motor Vehicles. The full regression test and subsequent upgrades were completed in October 2023. These upgrades created a stable foundation on which WEC staff could build new functionality to prepare for the 2024 election cycle.

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Clerks and WEC staff had opportunities to review the changes to the system in a live, low turnout election to observe any additional changes that needed to be made

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Staff continue to utilize the change management process implemented in 2019 to track business requirements, development, and deployment.

Through the new change management process, staff can review the history of changes and easily refer to details and decision points through the implementation, which allows issues to be easily pinpointed and problematic code to be rolled back without impacting other functionality.

Testing and fixes to prepare the system for the expected additional traffic and volume that accompanies a presidential election continued through the three other statewide elections and one special Senate district election held already in 2024. Ballots were issued for the first statewide election in early January and there has been an active election in the statewide system without a gap for the remainder of the year, making it difficult to find windows of time to make major changes to the system. While major system changes cannot occur during an active election, WEC staff still worked with clerks to identify system bugs that were not identified in upgrade testing. WEC staff also continued to incorporate other required datasets into the system to create real-time efficiencies and data comparison. For example, WEC receives data sets, as required by law, from the departments of Vital Records and Corrections, the court systems, and other sources.

These data sources are used to flag voters who are no longer eligible to vote because they are either deceased, have been deemed incompetent by court order, or have been convicted of a felony. While these checks have always been conducted in the system, the new integration allows increased efficiency clerks to process the flagged records in order to increase the data quality of the voter rolls and produce statutorily required audits of voter participation.

WISVOTE

Additionally, because the first statewide election was held in February, clerks and WEC staff had opportunities to review the changes to the system in a live, low turnout election to observe any additional changes that needed to be made. One such area for improvement was identified for county users who contract with their municipalities to enter data into the system on their behalf. These users noted a lag when changing between jurisdictions during high traffic periods of use in the system. After some investigation, WEC staff adjusted storage and access protocols for these jurisdictions so county users are now able to navigate the system and complete required tasks efficiently.

(2) Bulk Letter Process:

After elections, clerks are required under Wis. Stat. §§ 6.86(2)(b) and 6.86(2m)(a) to keep their absentee requests current for those voters who have submitted either a request as indefinitely confined or for a calendar year. The process involves the clerks sending letters to voters who have one of these types of requests on file and have failed to return their absentee ballot for an election. In the case of the calendar year requests, the clerks also deactivate the absentee applications at the time of sending the letters and for indefinitely confined voters the clerks deactivate the absentee applications either when those letters come back from the Post Office as undeliverable or when the voter does not respond to the request within 30 days.

In late 2023 and early 2024, WEC staff developed a process within WisVote to enable clerks to generate letters in bulk for both indefinitely confined voters and voters with a calendar year request on file. Previous to this upgrade, sending the letters was a laborious, individual process for clerks that often involved complicated mail merge efforts in other programs such as Word or Excel. Municipalities can now generate many of these letters within minutes from WisVote for both of these scenarios. Along with this letter generation, the new

process streamlines the clerk's workflow in WisVote by enabling them to efficiently manage large number of these applications simultaneously.

Clerks may still choose to use the old process of generating single letters or using processes outside of WisVote if they find those work better for them. However, they now have options within WisVote as well.

(3) Redistricting:

Earlier this year, staff updated WisVote to reflect the changes that occurred to the state Assembly and Senate lines because of Wisconsin 2023 Act 94, which was signed into law on February 19, 2024. As a result of these changes, staff updated the district assignments for the current wards in the system on April 15, 2024, prior to the nomination circulation period, and communicated those changes to clerks.

In addition, staff communicated with local municipalities and counties that had wards split by the new legislative lines. In those cases, parts of the existing wards were assigned to different Assembly districts, so action was needed to reflect that those areas would now have different districts.

As a result, staff created temporary wards on April 15 to help facilitate the nomination paper process and to allow time for local governments to update their ward plans to account for those changes. Once the nomination paper period was completed on June 3, staff updated WisVote on June 4 to reflect the locally assigned ward numbers for those split areas.

List Maintenance

The maintenance of the voter registration list is an ongoing task conducted primarily by clerks at the local level. These clerks are responsible for reviewing voter records to ensure the accuracy of the registration lists, poll books, and absentee ballot logs. WEC provides the technological framework to support this process and monitors compliance to ensure appropriate actions are taken.

In preparation for the 2024 General Election, WEC staff actively monitor 44 different data quality checks that cover various aspects affecting the accuracy of records in the WisVote system. Staff have reviewed and revised the intake process for Adjudicated Incompetent orders that are received from county Register in Probate (RIP) offices. Additionally, staff continue with the quarterly Movers process that assists clerks in updating their voter rolls for those voters who have potentially moved while also conducting outreach to remind clerks of priorities and deadlines critical to each election cycle.

Daily data quality reports provide several key areas of review, including absentee, addressing, election-related (ballot styles, polling locations, reporting units, poll book, etc.), voter information, and MyVote requests. If a municipality is flagged in one of the queries, staff reach out to guide clerks in correcting errors or verifying unusual records. Following the 2021 Legislative Audit Bureau review, staff also identified and corrected more than 5,000 records with duplicate Wisconsin Driver License or State ID information. This task has now been incorporated into daily data queries.

WEC staff monitor Registration List Alerts, also referred to as Reg List Alerts, ensuring each municipality is acting on information related to potential duplicate records, deceased records, and felon information. Deceased Reg List Alerts are generated from monthly data provided by both the Wisconsin Department of Health & Human Services (DHS) and the Electronic Registration Information Center (ERIC), which pulls data from the Social Security Administration. Felon Reg List Alerts are updated nightly with data from the Wisconsin Department of Corrections (DOC). Duplicate Reg List Alerts are flagged through in-system matching and ERIC data, which includes more complex matching such as name changes.

Before clerks print polls books, WEC staff email municipalities with outstanding Reg List Alerts as a reminder to review these records. Identifying duplicate records due to name changes can be challenging for clerks. To assist with this review, WEC has communicated the availability of the DMV Public Abstract Request System (PARS), which allows clerks to see previous names associated with DMV records, enhancing the accuracy of duplicate record matching.

WEC staff actively monitor 44 different data quality checks that cover various aspects affecting the accuracy of records in the WisVote system.

Another project staff undertook in preparation for the November General Election was refining how Adjudicated Incompetent orders from county RIP offices are handled. While the WEC does not have a role to play in the adjudication of incompetency process, it does enter the information from the orders issued as it pertains to voter eligibility and provides that information to clerks for verification in WisVote. Staff meticulously reviewed records dating to 2006 and cross-checked them with state death records to update voter status where applicable. After completing this cross-check, staff initiated outreach to RIP offices about potential active Adjudicated

Incompetent records and requested updates. In early 2024, staff compared remaining Adjudicated Incompetent records with the active voter list for possible matches. When a match was found, staff notified the clerk to allow them the opportunity to make necessary updates to voter records and inform the voter of the change and reason for it.

MyVote Updates

The MyVote.wi.gov website is the WEC voter portal that allows voters to register online, request an absentee ballot, track their absentee ballot, find their polling place, view a sample ballot, and more. All of the data displayed on the MyVote website is generated directly from WisVote. This means the relevant data is coming from the records reviewed and created by each of Wisconsin's municipal clerks. Commission staff deployed several updates to the MyVote website in response to lessons learned from the April 2024 Spring Election and Presidential Preference Primary and anticipated challenges for the November General Election.

(1) Site Updates:

Over the years, the use of MyVote website has grown significantly, establishing itself as a widely recognized and trusted resource for voters across Wisconsin. Most voter registrations and absentee ballot requests are now completed through this site. To keep pace with the growing reliance on the MyVote website and to enhance its functionality, the Commission introduced updates to the Online Voter Registration (OVR) functionality. These updates focus on minimizing common errors encountered by voters when updating existing registrations, streamlining the process for correcting flagged issues, and ensuring a smoother user experience overall.

In addition to improving the registration process, the Commission took steps to enhance the clarity of information available to UOCAVA (Uniformed and Overseas Citizens Absentee Voting Act) voters. Earlier this year, the UOCAVA voter information page on MyVote website was revised to better align with the guidance offered on the Commission's primary website (elections.wi.gov). The updated MyVote page now offers more comprehensive explanations of the different types of UOCAVA voters, along with clear instructions on their voting and registration options, making it easier for military and overseas voters to navigate their unique requirements.

Another important improvement expands language accessibility. In municipalities covered under Section 203 of the Voting Rights Act, Spanish-language ballot assistance must be offered by the municipality.

To support this effort, staff added a function that directs voters where to go in their municipality for Spanish-language sample ballots. This change is part of the Commission's ongoing commitment that all voters, regardless of language proficiency, have equal access to clear and helpful information.

The website also saw the reinstatement of drop box information views, a feature highly requested by voters in response to the recent Wisconsin Supreme Court ruling that unstaffed drop boxes may be used by clerks. In municipalities where clerks have entered drop box details into WisVote, including drop box location information, voters can see this information when tracking their absentee ballots or exploring In-Person Absentee Voting (IPAV) options. If a clerk has not provided such information, MyVote website continues to refer voters to their local clerk for further details, reinforcing the importance of municipal-specific guidance while ensuring the platform remains a comprehensive source of election information.

As the November General Election approaches, Commission staff are closely monitoring all aspects of the MyVote website to identify and resolve any issues that may arise as a result of these updates. We are committed to offer a reliable, user-friendly resource that voters can trust to meet their election needs as they prepare to cast their ballots.

Badger Books – Electronic Poll Books

Badger Books are Wisconsin's electronic poll books, developed and maintained by the WEC staff. They are the only electronic poll books certified for use in Wisconsin. These poll books integrate directly with the statewide voter registration system, ensuring voter list security and increased efficiency for both voters and election officials. Badger Books is a system that is a voluntary option for municipal clerks. The software was developed by the WEC and is provided to clerks free of cost. Municipalities then purchase commercial off-the-shelf hardware to deploy the system for their voters. The Badger Book program was launched in 2017 and has experienced steady growth in jurisdictions opting into use. After much preparation and training, 235 new municipalities have implemented Badger Books since 2020, bringing the total number of municipal owners that used the technology from 70 to 305. As of the time of this writing, 1.2 million registered voters reside in Badger Books communities.

While transition and new technology are inevitably coupled with necessary process adjustments for

clerks and poll workers, the overall implementation continues to be successful. The new technology was well received by both the clerks and voters. In 2023, staff implemented a Memorandum of Understanding (MOU) that certifies municipalities purchasing Badger Books have completed all required training and will maintain adequate levels of support for their program. Once signed, municipalities will be able to access specific Badger Book related functions in the statewide voter registration database. To date, all participating municipalities have signed and returned their MOUs, and new participants are required to sign an MOU before they can access and use Badger Books.

In advance of the August 13 Partisan Primary, the Badger Book team spent several weeks developing, testing, and assisting communities with implementation of a software update deployed via the statewide voter registration system. This update featured improvements to the process by which voter numbers are issued, adding a Spanish language option for the registration function, and a fix to the curbside voter signature workflow.

Staff preparation ahead of the August primary included a pre-election meeting with the clerks, Election Day troubleshooting, and coordination of post-election data uploads, generating and downloading pre-election files

as well as uploading post-election data. Staff have been compiling this feedback and are using it along with data about common technical and election administration functions for the pre-general election meeting with the municipalities to ensure Badger Book users are as prepared as possible for the November General Election.

Badger Voters Platform Upgrade

In 2023, WEC staff finalized a complete rebuild of the public-facing data request website, Badger Voters. The site was upgraded from a single page Javascript app project to more modern software protocols. This update of the application made Badger Voters faster, safer, easier to maintain, and more aligned with agency development standards for the WEC's various applications. For more information on the data being pulled from Badger Voters, please reference the Badger Voters Data Requests section of this memo.
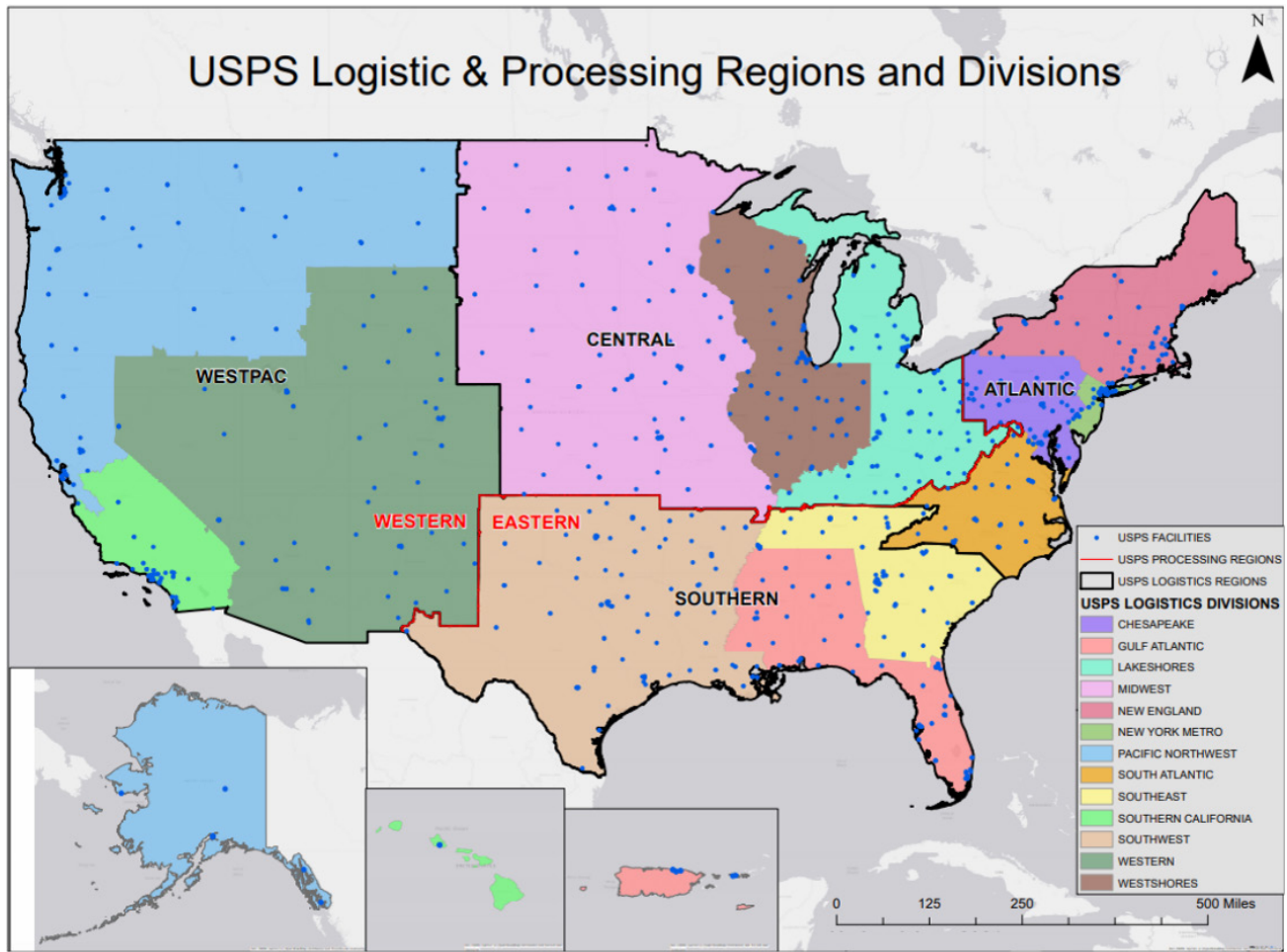
Fig. 1 USPS Postal Regions, Districts, and Facilities

USPS Coordination

Commission staff and USPS officials from Wisconsin's division meet at regular intervals throughout the year. Meeting frequency will increase as Wisconsin gets closer to the November General Election. These meetings have proven beneficial and popular at both organizations. Representatives from USPS have included managers from all regional levels, as well as mail design specialists and other technical experts when appropriate.

Wisconsin-based staff host the meetings and coordinate the attendance of other USPS representatives. Elections personnel that regularly participate include a cross-section of management, technical, and training staff. Elections representation is generally coordinated by the Technology Director or IT Project Manager.

The USPS organizational structure divides the nation into two processing regions that are further divided into four logistics regions and then 13 smaller "Divisions."

In the 2020 General Election, Wisconsin was one of a handful of states that straddled an Area boundary, meaning that Wisconsin was serviced by two separate USPS Areas and Districts. The current organization, as shown in the map above, now places all of Wisconsin in a single Logistics Division, along with Illinois and Indiana.

Finally, the WEC and USPS will continue working to provide clerks guidance to better understand the postal system and to improve coordination with local postal officials.

Some essential points to reinforce soon include the following:

- While first class mail is generally very efficient, the USPS recommends voters allow 10–14 days for ballots to move through the mail.

- Clerks can and should coordinate with their local postmaster when ballots are coming and going.

- Ballots that remain with the local post office are not tracked by the USPS and will not display delivery data on MyVote Wisconsin.

- Clerks should use USPS approved envelope designs and labels to avoid processing problems. Deviations in the placement of text, graphics, or postal markings may cause delivery issues.

- Postal facilities use a special fluorescent ID tag for easy identification of ballot materials during postal processing (example shown below).

Accessibility Program Update

The WEC will continue to conduct reviews of polling places for accessibility. The Commission approved the 2024 Review Program Plan, which proposed reviewing 95 polling places during the November General Election. Throughout 2023 and in the first half of 2024, WEC staff modernized the database and reporting system used to manage data collected during polling place reviews. The data is now stored in the statewide voter registration system instead of an external database. This allows staff to more easily validate and analyze data so clerks can see the results of their review more quickly.

In anticipation of the presidential election cycle, staff also revised the survey used to conduct polling place reviews. From May to November of 2023, WEC staff met monthly with members of the Accessibility Advisory Committee (AAC) to draft questions that would collect quantitative data about non-compliant elements, correct errors, and write new questions to better capture the experience of a voter with a disability. Following these meetings, staff added two new questions on the topics of curbside voting and greeters.

The new meeting schedule was so successful that the AAC continues to meet monthly rather than quarterly. Monthly meetings allow staff and Committee members from 12 disability and aging advocacy organizations to stay on top of current events and litigation. Staff collaborated with AAC members on a live webinar for clerks at the end of August. The webinar featured three presenters discussing the resources and services their different organizations can provide to voters with disabilities. These include things like braille ballots, transportation to the polls, and Election Day advocacy.

Staff worked with the AAC to create two new resources for clerks. The first is a pre-recorded webinar that details the different ways voters with disabilities can receive assistance and request accommodations. The second is an updated Hospitalized Voter Guide written in plainer language than the previous guide. Staff also reached out to the Disability Vote Coalition and Vot-ER for feedback on the new guide for feedback.

WEC staff regularly provide local election officials with accessibility-related supplies free of cost, including such items as accessible parking signage, wireless doorbells for curbside voting, page magnifiers, and signature guides for use by voters. In 2023, staff sent 1,616 items to clerks. At the end of 2023, staff circulated a survey to clerks about the products available in the Supply Program and asked what new products could be added. The results of that survey encouraged the addition of two new products: threshold ramps and lighted magnifying glasses.

At the recommendation of AAC members, the lighted magnifying glasses are taking the place of the page magnifiers that the program used to carry. Page magnifiers only have two times magnification and have to be removed from the ballot in order to mark it, whereas lighted magnifying glasses have three times magnification and can be held over the ballot while marking it or the handle can be unfolded to stand on its own while the voter marks their ballot. Staff will continue to provide the requested accessibility-related supplies to local election officials throughout 2024.

Security Preparations

This section of our readiness report provides an overview of the measures undertaken by staff to ensure Wisconsin is well prepared to conduct a secure, reliable, and successful election, despite the potential of challenges.

Safeguarding the integrity of elections remains a critical priority for the agency, both from a cyber security and a physical security perspective. Since the 2020 election cycle, numerous key security measures have been implemented and continue to be effectively maintained. However, the threat landscape and the required safeguards evolve constantly. The WEC remains at the forefront of election security efforts, adapting to changes as we approach the November General Election.

The Commission has been working tirelessly to improve the security of Wisconsin's elections framework, down to the smallest towns. These improvements have been tested by several elections and dealt with some minor incidents at local levels. Thanks to the enormous effort and collaboration on the part of local clerks, WEC is confident that Wisconsin is prepared to provide a secure presidential election and to have the data and tools to confidently stand behind the integrity of its results.

Security Partners

Since the 2020 election cycle, staff have maintained consistent engagement with local officials, as well as state and federal partners who provide critical security and intelligence information. Since 2016, the Cybersecurity and Infrastructure Security Agency (CISA) and its predecessor has remained a valuable partner for state and local election officials. CISA offers a range of services to the WEC, including threat intelligence, technical guidance, training, and both remote and on-site security assessments. In addition to coordination with CISA, Commission staff conduct weekly knowledge transfers with representatives from the Wisconsin Statewide Intelligence Center (WISIC), the Wisconsin Department of Justice (DOJ), the Department for Homeland Security (DHS), the Federal Bureau of Investigation (FBI), and Wisconsin's Department of Administration (DOA) Division of Enterprise Technology (DET). Staff continue to closely coordinate with Wisconsin's Cyber Response Teams (CRT), a joint initiative between DOA and the Department of Military Affairs (DMA), to deliver prompt incident response services to election officials across the state. In a new initiative, members of the CRT, including the WEC's security lead, have been trained to conduct

security assessments using the CISA model and, moving forward, will have the tools necessary to conduct their own risk and vulnerability assessments for local jurisdictions.

The impact of this improved coordination is particularly evident on election days. On Election Day, starting in 2018, staff from WEC, DMA, DET, and other partner agencies were stationed at WEC offices, at the State Emergency Operations Center (SEOC), and through State Homeland Security Information Networks (HSIN) in order to facilitate real-time coordination between security partners. This model of in-person and virtual coordination enables rapid information sharing and incident response.

The election landscape has significantly evolved since 2020, with a heightened focus on physical security.

Finally, staff continue to enroll all clerks, Commission staff, and Commissioners in Rave Mobile Safety, a system that enables rapid communication of alerts related to technical outages, weather, or other emergent events. The system also allows WEC to receive updates from clerks — for example WEC can survey all county or municipal clerks to ensure their power is on or that their polling places are open. Rave has proven an invaluable tool to disseminate information quickly.

To ensure the contact information is up to date and that all relevant individuals are properly enrolled, staff will conduct test notifications in preparation for the November General Election. This will allow clerks to update their contact information and to ensure that clerks have experience interacting with a Rave alert in the event it is needed in a real scenario.

Physical Security

The election landscape has significantly evolved since 2020, with a heightened focus on physical security. In response, the WEC undertook a comprehensive security assessment of its building to identify areas needing improvement. Following the assessment, staff collaborated with building management and the Department of Administration to begin implementing the recommended security updates. All state and federal partners were very receptive and helpful to implementing changes. The changes made benefit the security of WEC as well as all other state employees who share our spaces. Additionally, CISA extended similar security assessment services to municipal and county clerks across the state. CISA will coordinate with municipal and county clerks to assess their offices, in-person absentee sites, and polling places. Many assessments have been conducted in large and small

jurisdictions as they prepare for the 2024 elections. WEC has publicized these services and CISA has attended many clerk training events to promote their assessment offerings.

Security Training

One of the largest and most visible security programs is the training that staff has provided or facilitated for local election officials. The WEC was the first state elections agency to establish a permanent and adaptable election security tabletop exercise (TTX) program designed to increase awareness of potential security issues and offer a collaborative environment to develop and test response strategies. Although these exercises have largely transitioned to a remote environment to allow more clerks to participate, they remain highly sought-after training experiences. Training initiatives are discussed further elsewhere in this report.

The WEC received national recognition for developing a cybersecurity awareness training system that is now mandatory for accessing the statewide voter registration system

Staff have also collaborated closely with CISA to participate in and distribute federally produced trainings. This included participation in a national TTX on August 22 and

23 of this year, alongside federal agencies and representatives from other state election organizations, as well as an individualized tabletop exercise with Wisconsin-specific agencies, local election officials, and customized scenarios. Topics covered in these trainings included *Cybersecurity for Home & Work, Threats to Elections Officials, The Power of Hello/De-Escalation, See Something, Say Something, & Mail Handling, and Generative AI & Elections,* reflecting an increasing emphasis on physical security and potential disruptions at polling places.

At the heart of the clerk training program is the agency's online cybersecurity training modules. In 2018, the WEC received national recognition for developing a cybersecurity awareness training system that is now mandatory for accessing the statewide voter registration system. These interactive modules cover topics such as password security, safe browsing, phishing, and more. Additionally, in 2020, staff developed a learning module focused on incident response, which includes proactive measures to mitigate the impact of incidents and reduce their likelihood. These existing modules have received updates for new information and a better user experience over the past six years and will continue to receive updates to keep up to date on industry best practices. Clerks

are required to complete security training modules before they receive credentials to the statewide voter registration database.

To reinforce training programs and answer questions, Commission staff also provided election security presentations at multiple local conferences. These events included municipal and county clerk conferences, law enforcement conferences, as well as training exercises conducted with state and federal partners. WEC has accepted all opportunities presented to provide training on election security, both in-person and virtual.

The WEC has also provided material support to locals in the form of grants. These grants are discussed further in another section of this report, but major achievements include the elimination of outdated operating systems among clerks that use the state's voter registration system, ensuring local governments have IT support available to them if they should need it, and helping offset the costs for moving to an official .gov email address.

Information Security

On a technical level, the WEC has implemented several initiatives designed to significantly improve security. Among the most prominent is the implementation of multifactor authentication for the statewide voter registration system, which has been in place since 2018. This initiative involved distributing thousands of physical tokens to local election officials across the state and conducting a comprehensive training and education campaign. As a result, even if a user's password is compromised, unauthorized access to the system is still prevented. The token selected by the WEC generates a unique code for each use and will only do so when physically activated by pressing a button on the token, ensuring the attacker would either need physical possession of the key or to resort to session monitoring, which increases the likelihood of detection. Staff continue to expand MFA across applications while restricting access where possible to only state networks. WEC has also promoted to clerks that they expand their use of MFA to all other systems. For example, while WEC cannot set a policy mandating local jurisdictions use MFA on things like social media accounts and websites, WEC has promoted this as a best practice.

> **Even if a user's password is compromised, unauthorized access to the system is still prevented.**

Additionally, Commission staff continue to use an endpoint testing tool that is available to all municipal and county clerks. The software,

which was implemented in 2019, continuously monitors laptops and computers to verify that updates and patches are properly applied, identifies systems that require operating system upgrades, and receives alerts when devices have potential infections or threats. Should local officials lose access to computer hardware due to a security incident, the WEC has emergency loaner hardware available to ensure continuity of essential election functions. These devices are configured, maintained, and secured by Commission staff, and can be shipped next day to any community in Wisconsin if needed. The endpoint software also helps WEC to notify local election jurisdictions when something on their device is out of date or has been identified as a threat. Some local election clerks may not know what operating system or version they are using, the endpoint provides WEC with this information so we can proactively alert them to a change that is needed.

Contingency Planning

In addition to preventing an attack and limiting the damage an attacker can cause, staff is also developing contingency plans for dealing with unforeseen circumstances. Staff previously worked with state partners to develop an offsite backup location where the WEC could relocate to in an emergency and conduct

an election in the event the WEC offices were unavailable, or services were interrupted. Staff has also developed a plan for recovering from a complete infrastructure failure, which would enable the agency to return to function even in the absence of any assistance from DET.

> **The Commission has made a complete contingency plan a term of accepting some grant funding.**

In addition, local election offices also work on contingency planning. WEC has a template contingency plan that local election offices can use to plan for the specifics of their continuity of operations. WEC has also conducted webinars for local election officials where we discuss how to complete the template plan and items for communities to consider. In addition, the Commission has made a complete contingency plan a term of accepting some grant funding. Where allowable, jurisdictions are required to complete a contingency plan in order to receive election security funding. Local contingency plans account for how they would continue to conduct an election if there were a cyber, physical, or weather-related reason to relocate or respond.

Voting Equipment and Post-Election Audits

Voting equipment review, testing, and support are not tasks limited to a specific election.

Since the 2020 General Election, staff has invested a significant amount of time in ensuring the voting equipment used in Wisconsin is accurate and secure. All voting equipment in use in the state of Wisconsin has to first be approved by the U.S. Elections Assistance Commission and the by the six-member, bipartisan Wisconsin Elections Commission. Both levels of review involve technical review and testing.

The primary means by which staff reviews and tests voting systems is during the certification process, in which a vendor makes an application to the Commission requesting that their electronic system be tested and presented for consideration. State-level certification testing follows testing at a federally accredited Voting System Test Laboratory (VSTL). Staff reviews all pertinent test reports from the VSTL and all system documentation from the U.S. Elections Assistance Commission prior to conducting in-office functional testing. If the voting system in question contains a component capable of transmitting unofficial election results, that functionality is tested separately. Each certification event includes a public demonstration of the system and a meeting of the review panel of local election officials, advocates from the disability community, and other interested third parties. Following each certification event, staff presents a full report to the Commission with recommendations for or against certification.

Since 2020, staff has reviewed and tested nine electronic voting systems, which were presented to the six-member Wisconsin Elections Commission, in a public meeting, for consideration of approval:

Dominion Voting Systems:
- Democracy Suite 5.5C
- Democracy Suite 5.5CS
- Democracy Suite 5.17
- Democracy Suite 5.17S

Clear Ballot Group:
- ClearVote 2.3

Election Systems & Software:
- EVS 6043
- EVS 6060
- EVS 6070

Hart InterCivic:
- Verity Voting 2.7 (pending certification)

In addition to testing new and updated electronic voting systems, staff have also worked with equipment vendors to process 29 Engineering Change Orders (ECOs) since 2020 for systems that have already been certified for sale and use in Wisconsin. ECOs typically involve security upgrades or a single component of a voting system reaching end-of-life, making a replacement component of a similar kind and quality necessary. ECO requests are submitted to the U.S. EAC, tested by a VSTL, and approved by the Chair and reported to the Commission and the public.

Following each General Election, the WEC is required to audit the performance of electronic voting systems used to record and tabulate votes. Staff recommended and the Commission approved several changes to the post-election voting equipment audit in advance of the 2020 and 2022 General Elections. Staff have carried these changes forward in their recommendations for the 2024 audit.

Every active reporting unit in Wisconsin that uses an electronic voting system is eligible to be randomly selected to participate in the audit. Staff utilizes a random selection tool created by WEC developers to randomly select 10 percent of all reporting units in the state. Municipalities that are selected to participate in the audit hand tally all the votes in four randomly selected contests and compare those tallies against results generated by the voting equipment to ensure the electronic voting system tabulated votes accurately. As with the 2020 and 2022 post-election audits, WEC staff is recommending that all audits be completed and an interim report on the results of the overall audit be presented to the Commission prior to final certification of election results on December 1, 2024. The Commission will review and approve final procedures and selection criteria for the audit at its September 11, 2024, meeting.

Post-election audits are an essential election administration tool that serve a variety of purposes. Audits are conducted in public meetings, so they are a good opportunity for members of the public to get more information about electronic voting systems and see the results of the audit as they happen. Audits also inform potential future training opportunities or updated election administration procedures. Most importantly, audits verify the performance and accuracy of the electronic voting system. If there are any issues with the voting system, the audit will help uncover them and provide a further opportunity for investigation or potential decertification of the system. If there are no issues, the audits help verify results and serve as another means by which election officials can show the accuracy and security of elections in Wisconsin.

Absentee Envelope Redesign Project

On February 2, 2023, the Commission directed staff to develop a new absentee envelope package for approval no later than its September 20, 2023, meeting. The redesign project was intended to improve usability of the envelopes, reduce the frequency of common mistakes, and improve visibility in the postal system.

The absentee envelope package for voters included three elements.

EL-120: Absentee Ballot Mailer Envelope (outside envelope going to voter)

EL-122: Official Absentee Ballot Application/Certification (inside envelope returning to clerk)

Uniform Instructions

Statutory requirements for the EL-120 and EL-122 were published for the April 28, 2023, Commission meeting, and may be found here: elections.wi.gov/event/wisconsin-elections-commission-april-2023-meeting

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Usability Testing & Design Feedback

Preliminary Outreach

In preparation for the project, municipal and county clerks were surveyed on several aspects of the absentee envelope project and its design considerations. The survey focused on collecting clerk feedback on their envelope ordering process and its timing in relation to the 2024 elections, clerk preference on use of old envelope stock and a larger envelope, and an opportunity for clerks to share additional absentee information and design recommendations. In addition to the survey, staff met with the Wisconsin County Clerks Association to discuss their unique perspective on the project.
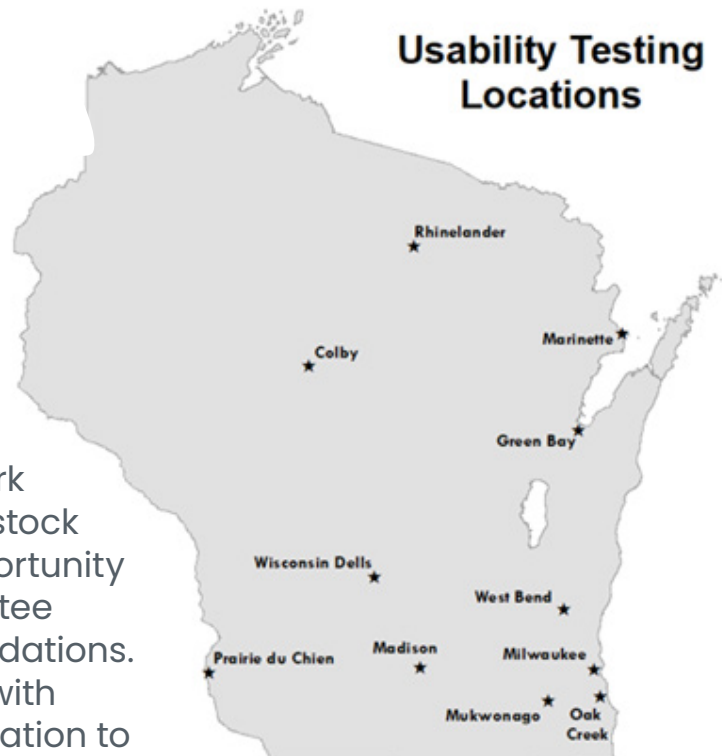

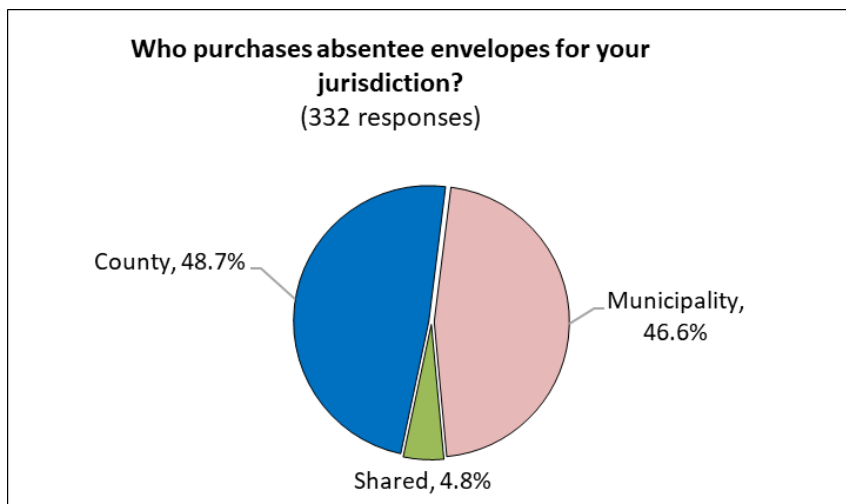Figure 2. Map of usability locations.

Who purchases absentee envelopes for your jurisdiction?
(332 responses)

County, 48.7%

Municipality, 46.6%

Shared, 4.8%

Figure 1. Envelope Purchasing

Common recommendations from clerks included:

- improve the witness address fields.
- highlight critical information.
- endorsements and denouncements of color-coded envelopes.
- endorsements and denouncements of larger sized envelopes.

- better accommodate the WisVote generated label.
- include proper directions on the legality of drop boxes.
- issues with ballot folding.
- use fewer words where possible.

In the summer of 2023 WEC staff traveled to several locations, as shown in Figure 1, to talk to clerks, election inspectors, and voters about the new absentee envelope redesign. The locations included Mukwonago, Marinette, Prairie du Chien, Madison, Milwaukee, Oak Creek, West Bend, Green Bay, Rhinelander, Colby, Lake Delton and Wisconsin Dells. An additional group of participants were recruited by the Accessibility Advisory Committee and participated in the study virtually after being mailed copies of the envelopes. Usability sessions were conducted in clerk's offices, libraries, community recreation centers, lunch-hour hubs, bingo halls, a local VFW, food truck events, and the UW-Madison Union Terrace. WEC staff ultimately collected in-person feedback from over 250 voters and local election officials.

Clerk Design Feedback

After having a chance to review the new design, clerks were nearly universal in their agreement that the new design is a significant improvement over the design used in pre-2024 elections. Clerks commented that the text is more readable, while still small, and what is required seems clear from their perspective. Some expressed concerns about the cost associated with using colors but praised the additions of yellow highlighting on required fields and using color to differentiate between regular, special voting deputy, and military and overseas EL-122 envelopes. They also greatly appreciated that the new envelopes are designed to fit the 2x4 inch label many clerks print from WisVote so that labels totally fill the voter information section on the EL-122 envelope. The previous envelope was not designed for the labels, and information was sometimes blocked when a label was applied.

Clerk participants reported that most mistakes or issues with EL-122 envelopes involve fields to be completed by the witness

Voters, Witnesses, and Assistants

Voters were also largely positive about the new design of the EL-122 and EL-120 envelopes. They said the EL-120 envelope looks official and is attention grabbing so voters would not discard the envelope by mistake. Most voters were presented versions of the EL-122 envelope in which a label completed the voter information for them, since that is the experience of most absentee voters across the state. Voters were observed to largely skip over the clerk initialing and label-covered voter information section at the top of the envelope and to jump directly to Step 2, to the voter certification signature. Some voters provided feedback that the certification statement was confusing and long, but that the bullet points helped to break it up. Voters did not have any difficulty understanding the requirement to sign their own name in the voter signature field. Upon review of the military and overseas envelope, some noted that the signature field may be too small, since that space is also shared with the date of birth requirement. Most voters understood the meaning of the assistant certification, and nearly all recognized that it is required only as applicable and is distinct from the role of witness.

Clerk participants reported that most mistakes or issues with EL-122 envelopes involve fields to be completed by the witness. Staff

observed that the requirement for a witness was largely understood by usability participants that had prior experience voting absentee. Participants who had not previously voted absentee by mail were more likely to question the requirement to obtain a witness. Participants from the disability community indicated that witness requirements are a barrier to participation to some voters who live alone and struggle with transportation issues to gain access to a witness.

WITNESS REQUIRED

To better clarify the witness requirement, two additions were made. First, the sections of the envelope were laid out into three steps to serve as a checklist for voters. Plain language principles indicate that steps help provide guidance to individuals interacting with a form. The steps may also serve as a helpful reference point in the new Uniform Instructions. The second addition is the "alert icon" within the witness certification section, also clearly labeled "Witness Required," which serves those more responsive to visual rather than text-based indicators. Once these two changes were made to the design, it was observed that usability participants were more likely to continue through the entire certificate and understand that a witness is required.

Finally, for consistency with the voter certification section, the witness signature was moved to the first required field and the witness printed name was moved to the second required field in the witness certification section.

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Election inspectors strongly supported the addition of highlighting the required fields on the absentee envelope

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Election Inspectors and Special Voting Deputies

Election inspectors are the final point of interaction with most absentee ballot envelopes before the ballot is counted at the polling place or central count location on Election Day. Election inspectors echoed clerk remarks that missing witness information is the most common reason an absentee ballot is referred for rejection by the municipal Board of Canvassers. Election inspectors strongly supported the addition of highlighting the required fields on the absentee envelope, noted that the text size would be small for some populations, but otherwise approved of the design as it relates to completing their responsibilities in the process.

United States Postal Service (USPS)

Staff worked with contacts from the USPS to complete mail piece design analysis and a mock test of the absentee envelopes within the mail stream. Mail piece design analysis suggested some small adjustments to placement of the election mail logo to not interfere with set exclusion zones, or the placement of the 2x4 label printed from WisVote. USPS staff expressed enthusiastic support for the use of color blocking and color differentiation on the envelopes to help increase visibility of the envelopes for mail carriers.

Cost and Vendor Feedback

Staff evaluated different envelope sizes and consulted with clerks, vendors, and the USPS, to assess costs, availability, and mailing considerations. Staff initially considered a larger envelope to allow more space for design adjustments, required fields, and instructions. Unfortunately, larger envelopes also result in higher postage costs and problems with limited supply. A larger commercial envelope is not available that would qualify for a letter postage rate.

Changes to the EL-120 and EL-122

Template Approach

The new design is adapted from a template adopted by 21 states and the District of Columbia. Starting from this template effectively added the previous rounds of usability testing that produced it. It also means Wisconsin's new envelopes are more readily recognized as election mail within the U.S. Postal System, reducing the risk that mail will not be properly delivered. Greater recognition of Wisconsin absentee ballots in the postal system is particularly important for Wisconsin residents away from the state at the time of voting.

Changes to the EL-120

The new design of the absentee envelope provides key indicators to postal workers and clerk staff that inform them of the nature of the materials enclosed. The mail piece labeled "Official Absentee Balloting Material," contains the official election mail logo, and includes the Wisconsin state seal. The blue ink on each side of the envelope will provide postal workers with a better opportunity to quickly identify ballot mail. The new design also clearly indicates that the envelope is first-class mail and includes the USPS endorsement of "Return Service Requested." This endorsement means that if a mail piece is unable to be delivered as addressed, it

will be returned to the sender with a notice of the issue preventing delivery or a notice of non-delivery.

The new design also better fits the 2x4 inch mailing label generated by WisVote. Since June 2020, intelligent mail barcodes (IMBs) have been available for clerks in WisVote, and when an absentee ballot record is created, WisVote is programmed to determine the correct address record and zip code to be used. The previous design was too small for the label, meaning that clerks had to either obscure text or fold the label under the envelope. Folded labels increase the chance that the printed intelligent mail barcode will not be read.

Changes to the EL-122

The new EL-122 incorporates many revisions to ensure statutory compliance and improve usability. The revised elements of the certificate envelope include the voter information section, voter certification, assistant certification, and witness certification. Clerks typically pre-fill the voter information section with a printed label, but voters in some jurisdictions may receive a blank form.

To ensure voters complete the statutorily required elements of the certificate envelope, three distinct versions were developed for three audiences that are differentiated by statute:

- Special Voting Deputies
- Military and Overseas Voters
- Regular absentee voters, including in-person absentee voters

Staff wish to note that, as described in the LAB section below, the new witness certification includes a separate field for the witness printed name. This addition was recommended by the LAB during their review completed in October 2021. An example of the new regular envelope and the old envelope are provided on the following page.

Conclusion

Based on early feedback from clerks, voters, printers, and postal officials, the new envelopes are easier to understand, comply with statutory requirements, and incorporate LAB recommendations provided after the 2020 General Election. Further assessment after the November General Election will provide data about the performance of the envelopes, and whether common errors were reduced after the redesign.

Official Absentee Ballot Certificate & Application

STEP 1	CLERK OR DEPUTY >> Initial Here >>	In-person absentee voter showed valid POI	Voter exempt from or met POI requirement

CLERK OR VOTER must complete this part

Voter Information

Election Date (mm/dd/yyyy) ___/___/___

☐ City Name:
☐ Village Name:
☐ Town Name:

Name (Last, First, Middle)

Street Address

County		City	
State	Zip	Ward	Ald. Dist

STEP 2 — VOTER must complete this part

I certify, subject to the penalties for false statements of Wis. Stat. § 12.60(1)(b), that:

- I am a resident of the ward or of the aldermanic district of the municipality in the county of the state of Wisconsin indicated hereon OR I am entitled to vote in the ward or aldermanic district at the election indicated hereon
- I am not voting at any other location in this election
- I am unable or unwilling to appear at the polling place in the ward on Election Day, or I have changed my residence within the state from one ward to another less than 28 days before the election
- I displayed the ballot unmarked to the witness and in the presence of no other person marked the ballot and enclosed and sealed it in this envelope in a manner that no one but myself and an assistant under s. 6.87 (5), if I requested assistance, could know how I voted
- I requested this ballot and this is the original or a copy of that request

X _____
Voter Signature

Certification of Assistant (if applicable)
I certify that the voter is unable to sign their name due to a disability and that I signed the voter's name at the direction and request of the voter

_____
Assistant Signature

STEP 3 — WITNESS must complete this part

I the undersigned witness, subject to the penalties for false statements of Wis. Stat. § 12.60(1)(b), certify that:

⚠ **WITNESS REQUIRED**

- I am an adult U.S. citizen
- The above statements are true and the voting procedure was executed as stated
- I am not a candidate for any office on the enclosed ballot (except in the case of an incumbent municipal clerk).
- I did not solicit or advise the elector to vote for or against any candidate or measure

X _____
Witness Signature

_____
Witness Printed Name

_____
Witness Address (Number, Street Name, City)

OFFICIAL ABSENTEE BALLOT APPLICATION/CERTIFICATION

(Official Use Only) The voter has met or is exempt from the photo ID requirement. Municipal or Deputy Clerk initial here: _____

Note: With certain exceptions, an elector who mails or personally delivers an absentee ballot to the municipal clerk at an election is not permitted to vote in person at the same election on Election Day. Wis. Stat. §6.86(6).

Voter: Please complete steps **1** through **5** below, in the presence of your witness.

1 Place your voted ballot inside the envelope and seal it. Do not use tape or glue.

2 Complete the section below if not completed by the clerk. Provide your VOTING address.

Date of Election (month, day, year)	County

Municipality (check type and list name) Town ☐ Village ☐ City ☐ of

Voter's Name (Last, First, Middle) including suffix (Please print legibly)

Street Address–Provide house number and street name or fire number and street name. OR

If your rural address does not include a house number/fire number and street name, provide rural route number and box no.

City		Zip Code
	WI	

Official use only:	Ward #	District (if applicable)	Voted in clerk's office ☐

3 Sign and date this section.

CERTIFICATION OF VOTER (Required)
I certify, subject to the penalties for false statements of Wis. Stat. § 12.60(1)(b), that I am a resident of the ward of the municipality in the county of the state of Wisconsin indicated hereon, and am entitled to vote in the ward in the ward at the election indicated hereon; that I am not voting at any other location in this election; that I am unable or unwilling to appear at the polling place in the ward on election day, or I have changed my residence within the state from one ward to another later than 28 days before the election. I certify that I exhibited the enclosed ballot, unmarked, to the witness, that I then in the presence of the witness and in the presence of no other person marked the ballot and enclosed and sealed the ballot in this envelope in a manner that no one but myself and any person providing assistance under Wis. Stat. § 6.87(5), if I requested assistance, could know how I voted. I further certify that I requested this ballot.

X _____ ___/___/___
▲ Signature of Voter ▲ (All voters must sign.) Today's Date

REQUIRED OF MILITARY AND OVERSEAS VOTER ONLY: I further certify my birth date is:
___/___/___

4 Have your witness sign and write their address below.

CERTIFICATION OF WITNESS (signature and address of witness are required)
I, the undersigned witness, subject to the penalties for false statements of Wis. Stat. § 12.60(1)(b), certify that I am an adult U.S. Citizen and that the above statements are true and the voting procedure was executed as stated. I am not a candidate for any office on the enclosed ballot (except in the case of an incumbent municipal clerk). I did not solicit or advise the voter to vote for or against any candidate or measure. I further certify that the name and address of the voter is correct as shown.

1. _____
▲ Signature of ONE adult U.S. citizen witness▲

2. _____
▲ If witnesses are Special Voting Deputies, both must sign. ▲
▼ Address of witness or addresses of both SVDs ▼

1. _____
2. _____
Provide house number and street name or fire number and street name, city, state and zip code. OR If your rural address does not include a house number/fire number and street name, provide rural route number and box number, city, state and zip code.

CERTIFICATION OF ASSISTANT (if applicable) - assistant may also be witness
I certify that the voter named on this certificate is unable to sign his/her name or make his/her mark due to a physical disability and that I signed the voter's name at the direction and request of the voter.
X _____
▲ Signature of Assistant ▲

5 Mail back your ballot. Allow 4-5 days for delivery to ensure your ballot is received by Election Day. Ballots received after Election Day will NOT be counted.

Elections Subgrant Programs

Federal grant funds have been vitally important to prepare both state and local election officials for the November General Election.

Since 2022, Wisconsin has received on average $1 million annually in federal funds to "improve the administration of elections for Federal office, including to enhance election technology and make election security improvements to the systems, equipment and processes used in federal elections." Because Wisconsin is a highly decentralized election system, the Commission continues to seek ways to support local election officials and to increase federal election security for our state. Election participation, in part, depends on the public confidence in our election system and the security of our elections. Our state's election security is only as strong as the weakest link. Federal funds have been critical to both state and local election officials ahead of the November General Election.

When federal funds are allocated to the Commission, staff perform a deliberate process to analyze potential uses for the money, based on the agency's statutory responsibilities, federal requirements, and available resources. Staff first evaluate proposals that permit funds to be passed directly to Wisconsin counties and municipalities. This is consistent with the Commission's past practice of distributing most federal funds directly to counties and municipalities. From 2018 to 2023, more than 75 percent of all federal dollars received by the WEC were allocated to local governments.
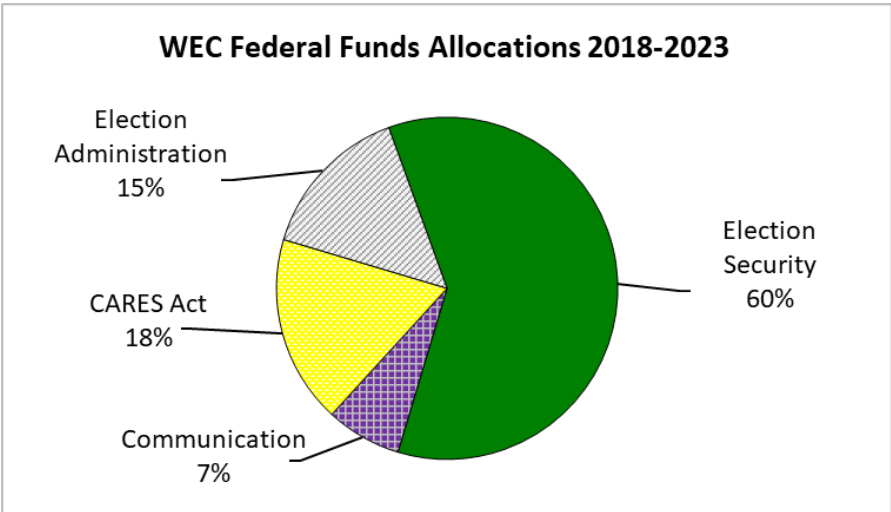

WEC Federal Funds Allocations 2018-2023

- Election Administration 15%
- CARES Act 18%
- Communication 7%
- Election Security 60%

Figure 1. Federal Funds Recipients 2018-2023

Figure 1 Definitions.

County/Muni – funds passed directly to counties, cities, villages, or towns through subgrants.

State: funds retained by the WEC for hardware, services, or temporary staffing.

Other: funds applied to unique statewide projects such as the deployment of multifactor authentication and endpoint monitoring.

Including CARES Act funds allocated to the Commission in 2020, the WEC has authorized more than $13 million in subgrants to counties and municipalities in the last five years.

Table 1. Subgrants Approved by the WEC 2018–2023

County & Municipal Subgrants Approved by the Wisconsin Elections Commission 2018–2023	Funds Authorized
2019 Election Security Subgrant for Municipalities	$1,100,000
2020 CARES Subgrant for Counties	$750,000
2020 CARES Subgrant for Municipalities	$4,126,528
2020 HTTPS Election Security Subgrant for Counties	$36,000
2020 Election Security Subgrant for Counties	$3,875,658
2020 Election Security Subgrant for Municipalities	$1,206,000
2022 Election Security Subgrant for Municipalities	$1,000,000
2022-23 Election Security .gov Domain Subgrant	$300,000
2023 Accessible Voting Equipment Subgrant for Municipalities	$350,000
2023 Envelope Redesign Subgrant	$600,000
TOTAL	**$13,344,186**

Consistent with federal grant requirements, the Commission has also directed the majority of federal dollars to election security needs, as shown in Figure 3 below.
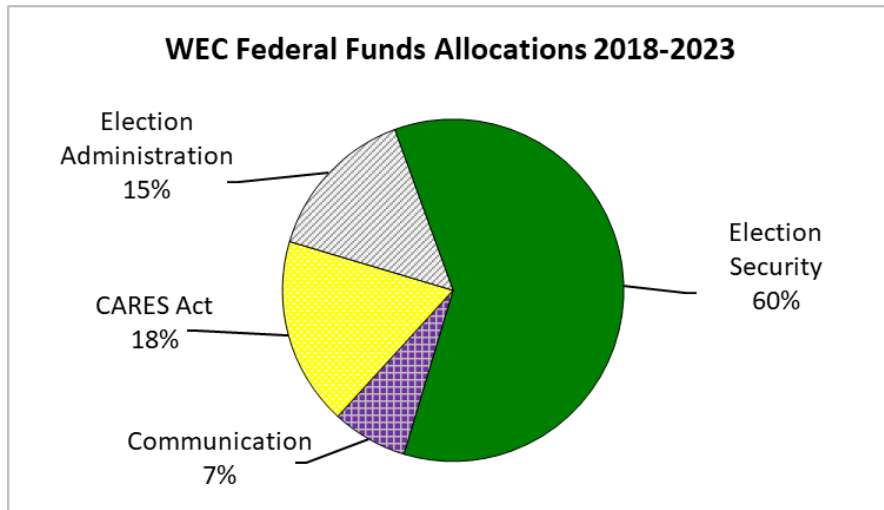

Figure 3. Federal Funds Allocations 2018–2023

Figure 3 Definitions.

Election Security: election security hardware, software, or development.

CARES Act: projects as authorized through the CARES Act to include cleaning supplies, personal protective equipment, and supplies to support increased demand for absentee voting.

Election Administration: election administration processes including expanded post-election audit processes, intelligent mail bar code postage tracking, accessibility improvements, and WisVote development.

Communication: tools such as a clerk learning management system, website support and development, and professionally produced informational products.

Municipality Election Security Subgrant

The Municipality Election Security Subgrant sought to bring municipalities up to a baseline of security. The baseline included (1) an adequate computer to use on federal elections preparation, administration, and reconciliation, (2) information technology support to help the municipality keep the computer secure, and (3) election security training for the municipality's election officials. Depending on the specific needs of the municipality, funds were awarded for any or all those three deficiencies in the amounts, $600, $500, and $100. Since it was first introduced in early 2020, there have now been three iterations of this same subgrant program.

Election Security .gov Subgrant

The .gov Election Security Subgrant was introduced in 2022 to help clerks in setting up a trusted .gov domain for secure email communications. Municipalities can receive $600 for eligible expenses related to establishing the domain. The reimbursement program was initially open until January 31, 2024, and was later extended by the commission in May 2024 to end December 1, 2025.

Accessible Voting Equipment Subgrant

Under the Consolidated Appropriations Act of 2023 (Public Law 117-328), the WEC was awarded additional federal funds to "improve the administration of elections for Federal office, including to enhance election technology and make election security improvements." Up to $350,000 of these funds were allocated through the 2023 Accessible Voting Equipment Subgrant Program to help municipalities upgrade or purchase new accessible voting equipment. Each jurisdiction could receive up to $750 under this program, with funding available until the allocated amount was exhausted. Jurisdictions qualified by purchasing approved equipment or related accessories designed to assist voters with disabilities. Approved devices included models like Clear Ballot ClearAccess, Dominion Voting ImageCast series, and ES&S ExpressVote systems. This grant played a crucial role in ensuring that voting is accessible for all citizens, particularly those with disabilities, by supporting the adoption of compliant, reliable, and accessible voting technologies.

Envelope Redesign Subgrant

Staff introduced the Envelope Redesign Subgrant to assist municipalities in adopting the updated absentee ballot envelope designs discussed in the previous section. To ease the financial burden on municipalities, the WEC allocated up to $600,000 in federal funds for this subgrant. Funding amounts were calculated based on each jurisdiction's voting-age population as of January 1, 2022, with a minimum award of $20. By supporting the adoption of these updated designs, the grant aimed to improve the reliability of absentee ballot processing and ensure compliance with election laws across the state.

Voter Outreach Preparations

To provide voters with all the information they need to confidently participate in the upcoming November General Election, the WEC's Public Information Office is developing an extensive program of educational and other public outreach materials for voters and for local election officials to reach their own constituents directly.

In brief, these materials and programs are planned to include:

- In-person educational appearances.

- A robust calendar of agency social media posts through November

- Templates of suggested social media posts for local clerks that remind voters of key dates and other election needs.

- Regular media availabilities with reporters.

- A series of news releases informing voters of key election facts.

- Up-to-date answers on the agency website to frequently asked questions about how to vote and Wisconsin's system of election administration.

- A communications guide that explains best communications/ media practices to local election officials.

- An "election ambassador" toolkit that would provide interested members of the public, along with partner institutions and their members, a toolkit containing educational resources to help educate their networks about the voting process.

- A media campaign focused on informing voters about voter education resources, including where to go to register to vote.

- Ongoing communications-related support for local election officials.

- Partnerships with state-level agencies in case of a necessary crisis response.

- Multiple website resources.

Speaking Engagements

In order to connect with voters and with elections officials in advance of the November General Election, Administrator Wolfe has kept a robust schedule of in-person educational events and plans to continue presenting at such events for the remainder of the General Election cycle. Administrator Wolfe has participated in educational presentations in Manitowoc, Waukesha, La Crosse, Milwaukee, Chippewa Falls, and Waupaca, explaining to event attendees how Wisconsin's election administration system works. The ensuing media coverage results in factual election-related information getting out to a greater number of individuals in each community visited.

Before Election Day, the public information office is working to schedule additional appearances by Administrator Wolfe in select cities across the state.

Agency Social Media

The PIO team is working to develop a week-by-week calendar of social media posts to be published on the agency's X (formerly Twitter) and Facebook channels through Election Day and the days after. The agency's social media posts will focus on key dates and deadlines that voters must know to successfully participate in the election. They will also include key facts about the system of checks and balances in Wisconsin's election administration system to build voter confidence.

Social Media Posts for Clerks

The agency is working to develop a calendar of social media posts for clerks that will mirror the agency's social media calendar and provide clerks with opportunities to tailor the posts to their own communities. Both the agency and local election officials' social media calendars are set to launch in September. The WEC has also provided this resource for all other elections in 2023 and 2024 in the hopes that clerks have built a strong foundation of knowledge with their followers.

Media Availabilities

Reporters can hear directly from Administrator Wolfe through a series of media availabilities hosted by the PIO team. We held two such events, one on the day before and one on the day of the Aug. 13 Partisan Primary. We have similar plans for media availabilities leading up to and on the day of the November General Election. In those sessions, usually held via Zoom, Administrator Wolfe makes some opening remarks on timely topics, then takes questions from reporters. If time allows, the PIO team will schedule media availabilities throughout the month of October,

into early November, and in the weeks following Election Day as the election is being certified.

News Releases, FAQs

The PIO team is planning a series of news releases to send to local, state, and national media in the weeks leading up to the General Election. The goal of these news releases is to ensure that both our media colleagues and their readers and viewers understand what voting, registration, and observation opportunities are available to them. The releases will remind voters about registration and absentee deadlines; what to know ahead of Election Day; and guide media on how to cover elections in Wisconsin.

Additionally, we plan to update the Commission's Fact Checks and FAQ pages with up-to-date factual responses to topics that are frequently in the news or the subject of questions and concerns on social media.

Communications Guide

There is a plan to reissue our communications guide for local election officials that we designed and shared with clerks in advance of the 2020 and 2022 general elections. We will freshen up the toolkit and send it to clerks again this fall. The toolkit includes news release templates for clerks to use in the event they need to

publicize something either before or on Election Day, general pointers about "do's and don'ts" for clerks when dealing with media inquiries and requests, and other general communications information that clerks may find useful. While the toolkits don't go to voters directly, we believe preparing clerks in this regard is also good for the electorate and helps clerks better serve voters.

"Election Ambassador" Toolkit

The PIO team is working to develop an "election ambassador" program similar to those implemented in a number of other states and jurisdictions. This program would provide interested members of the public, along with partner institutions and their members, a toolkit containing graphics, flyers, posters, templated social media posts, videos, fact sheets, and other resources on mis- and disinformation, media literacy, and requirements of the voting process, including voter registration resources and even voter registration applications. The goal would be for participating individuals and institutions to share these materials widely across their networks.

Public Information Campaign

With the funding freed up from the "eligible but unregistered" exemption from ERIC, the Commission hopes to launch a voter outreach campaign that can provide voters with easily accessible and engaging information about the voting process, including voter registration options. The agency plans to work with a marketing firm to assist with developing the campaign and making earned and paid media placements.

It is anticipated that the main message of the advertisements would be to direct individuals to voter registration and other election information resources, such as the MyVote Wisconsin website. More information about this campaign is available in a separate agenda item.

Additional Partnerships

The PIO team plans to be available to assist any local election jurisdictions with public information needs and crisis response. Staff also work alongside our state level partners to ensure all state level agencies with election-related responsibilities are prepared to effectively communicate on Election Day and the days before and after.

Website Resources

The agency has many voter-focused resources available on our website and will use our own social media channels and the website home page to point voters to those resources in the weeks leading up to Nov. 5.

Among the resource topics available to voters:

- Information on registering to vote. elections.wi.gov/Register

- An explanation of the Photo ID law in Wisconsin elections.wi.gov/photoid

- Voting by absentee ballot elections.wi.gov/voters/voting-mail

- Accessible voting for those with disabilities elections.wi.gov/voters/accessible-voting

- Elections 101, a four-part video series aimed at high school students and the general public elections.wi.gov/101

Customer Service Preparations

The WEC is implementing a multi-part program in order to ensure customer service capabilities are prepared for the 2024 General Election. The challenge is significant.

In the weeks around any November General Election, the WEC staff fields tens of thousands of phone calls and emails. We expect the volume of contacts in the weeks around the November 2024 election to be unprecedented as voters and clerks adjust to new ways to navigate the election.

Unlike some state elections offices that might be associated with a larger state agency, such as a Secretary of State's Office, the WEC does not have a peripheral, larger team to draw on during busy times. WEC is also limited by the position authority allocated to our agency, in terms of bringing in additional staff during busy times, WEC must rely on temporary employees and call center assistance. However, many of the calls fielded by WEC staff in the months before an election require a depth of election expertise to help with real-time matters of consequence for clerks or voters. Therefore, there is a limit as to how much of the customer service role can be delegated to temporary staff.

The current procedure for WEC customer service utilizes a helpdesk model. Calls and emails come to a central phone number and central email address and are then distributed to subject matter experts on the larger staff.

Some of the ways the WEC is preparing our customer service model for the November General Election include:

Toll-Free Phone Tree. In early 2020, WEC staff reconfigured the main, toll-free agency phone number 1-866-VOTE-WIS to utilize a phone tree model. There are two main branches in the phone tree: voter questions and clerk questions. From there clerks have the option to speak to staff in various areas of the agency. For example, the caller can speak to either an expert on election administration or an expert on the statewide voter registration system. From there the phone system will find an available expert. Voters who call can choose from popular choices like requesting an absentee ballot, registering to vote, or questions about photo ID. Using the call tree model allows us to incorporate some of the other efficiencies outlined below.

Zendesk Software. In 2021, the LAB report recommended the WEC use software to track election-related questions, comments, and concerns more accurately. WEC subsequently purchased Zendesk software, which is a customer support service that allows emails to be grouped into categories for ease of distribution of the incoming emails. Zendesk allows only the correct groups/teams to get emails quickly and allows others to see how the emails are responded to. Zendesk allows teams to research different emails and see the responses, which helps in providing uniform answers to questions. Zendesk also allows for pre-determined responses (known as macros) to the repeated email questions to save time in the responses.

Phone Management Software. In 2022 the state updated its systems to Teams, which allows the WEC helpdesk to see who is available to take a call and who is already in a call or a meeting. It also allows us to set expert groups that stem from the phone tree, thereby lessening the need for customers to talk to a helpdesk representative and instead allows the call to be routed directly to an available expert. It also allows the helpdesk or other staff to send a message to staff who are answering a transferred call to provide them with any additional information that needs to be relayed. All voice mail (VM) that comes in are converted to email with the recorded message attached. This ensures we are able to respond quickly to the voice mail.

Call Center. Beginning on August 7, WEC contracted with a call center that we have used in several previous elections to help with basic voter calls. Using the phone tree, if a voter indicates that they need basic assistance with tasks such as finding their polling place, those calls are routed through the call center to answer. WEC staff trains call center employees and has also developed an escalation process so that if a customer inquiry exceeds the call center's election knowledge, they can transfer it to a WEC expert to further assist. Utilizing the call center helps to free-up WEC staff to answer questions that require election expertise, while still providing customers with more standard questions, quick answers and excellent customer service. Additionally, call center staff have been trained to assist with basic voter Zendesk tickets as well.

Temporary Staff. Beginning in late April, staff started recruiting five temporary staff through the November General Election. These additional staff will be primarily used to increase the capacity of the helpdesk in directing calls and emails to subject matter experts. They will also assist with other data entry projects such as ensuring clerk contact information is kept up to date and with following up with clerks to ensure they have entered all their data into the statewide system so it displays correctly on the MyVote website.

Limited Term Employees. Beginning in June staff began recruiting for eight elections specialist LTE positions throughout the Wisconsin Municipal Clerks Districts 1-8 to provide ongoing and quality education, training, outreach, technical assistance, and advice to municipal clerks, county clerks and local election inspectors (poll workers) who conduct elections as

well as to ensure adherence to and compliance with Wisconsin election laws and required procedures.

Spanish Language Assistance. To better serve Wisconsin voters, the agency has three Spanish speaking staff who work in the office to assist with both phone calls and emails from voters who speak Spanish.

Extended Hours. In the weeks prior to the election, WEC staff will offer extended office hours to assist both clerks and voters. These additional hours will cover both evenings and weekends in the critical weeks around the election and on important election deadlines. On Election Day, WEC staff will be available to assist with questions about opening polling places, help with Election Day voter calls, and to assist with end of the night tally procedures.

Managing Other Contacts. Over the last four years the public profile of the WEC and elections has increased, meaning with each election the number of contacts to the agency reaches a new high. WEC staff has found that it is important to manage contacts to some customers through other platforms. WEC has created several efficiencies in this area to prepare for November. For example, through upgrades to the MyVote.wi.gov addressing workflow, if a voter encounters difficulty with entering a new address, the information the voter entered is automatically collected and sent to a special inbox for WEC staff to examine. This eliminates the number of contacts needed with the voter and helps WEC quickly identify the type of contact to quickly remedy the issue. A similar revision has been made to the statutory complaint process. There are five types of complaints that can be filed with our office. WEC staff updated the flowchart for users to determine the most relevant type of complaint and then create a pre-filled form to send to staff for resolution. Many other changes have been made to the way WEC communicates with local election officials, who often are dealing with time-sensitive questions. Changes include identifying a phone number just for clerks to call WEC and creating emergency and secure communication channels to provide alerts and survey tools to clerks on their mobile devices. This is especially important on Election Day, when clerks are often not near their computer or desk phone.

Legislative Audit Bureau (LAB) Report

To prepare for the 2024 General Election, the Commission considered observations and recommendations issued by the LAB following the 2020 General Election. The six-member, bipartisan Commission reviewed and considered action on each recommendation during a December 1, 2021, meeting. By law, decisions of the Commission require an affirmative vote of at least two-thirds of the members. Minutes for the meeting are available on the Commission's website at this link: elections. wi.gov/event/wec-december-2021- meeting.

As of this report, all 30 recommendations are either in progress, complete, or have been superseded by legislation or litigation. The Commission submitted an implementation report to the Legislature in December 2021, which is available on the Commission's website at this link: elections.wi.gov/ news/wisconsin-elections- commission-addresses-all-30- recommendations-included-lab- audit-report. The Commission then submitted a final report to the Legislature in March 2022 with its final status update, which is available at this link: elections. wi.gov/news/wec-implements- legislative-audit-bureau- recommendations.

These items are being presented in our 2024 readiness report to show continuing progress on the items that were not already complete in 2022, and to demonstrate that each of the recommendations made by the LAB were addressed by the Commission to benefit the preparations for the 2024 General Election.

Summary of Recommendations: The nature and status of each 2021 LAB recommendation is detailed below.

#1 (Clerk Training)

SUMMARY: LAB recommends updating existing administrative rule EL 12 to reflect a recent legislative change to the training terms for municipal clerks and to reflect the brand name "WisVote" instead of the generic term "statewide voter registration system (SVRS)."

STATUS: Complete. The new note can be viewed at this link: docs.legis.wisconsin.gov/code/admin_code/el/12/01/5

#2 (Clerk Training)

SUMMARY: LAB recommends that WEC should amend Admin. EL-12 to include specific information on the method used to contact the governing bodies when municipal clerks do not report sufficient training.

STATUS: Rule drafted and awaiting final legislative review. The rule order and other documents can be reviewed at this link: docs.legis.wisconsin.gov/code/chr/all/cr_24_043.

#3 (Clerk Training)

SUMMARY: LAB recommends that once WEC amends Admin. EL-12 to include the specific method for contacting governing bodies, it should then follow said rule.

STATUS: Rule drafted and awaiting final legislative review. The rule order and other documents can be reviewed at this link: docs.legis.wisconsin.gov/code/chr/all/cr_24_043.

#4 (Election Inspector and SVD Training)

SUMMARY: LAB recommends that the WEC should promulgate an administrative rule that specifies the content of training provided to special voting deputies (SVD) and election inspectors (poll workers).

STATUS: Rule drafted and submitted to LRB. Draft documents can be reviewed at this link: elections.wi.gov/draft-rule-chapter-el-13-training-election-inspectors-special-voting-deputies.

#5 (DOT Data Sharing)

SUMMARY: LAB recommends that WEC renew a data sharing agreement with the Wisconsin Department of Transportation (DOT).

STATUS: Complete.

#6 (DOT Data Sharing)

SUMMARY: LAB recommends that WEC include a mechanism in the updated DOT agreement to ensure that the agreement is kept up to date in the future.

STATUS: Complete.

#7 (DOT Data Sharing)

SUMMARY: LAB recommends that WEC work with the DOT to "obtain the electronic signatures of individuals who register online to vote, or to request that the Legislature modify the statutory requirement that the Wisconsin Elections Commission obtain [signatures]."

STATUS: Complete.

#8 (DOT Data Sharing)

SUMMARY: LAB recommends the WEC compare driver's license and identification card numbers nightly to identify duplicate numbers.

STATUS: Complete.

#9 (DHS Data Sharing)

SUMMARY: LAB recommends the WEC renew a data sharing agreement with the Wisconsin Department of Health Services (DHS).

STATUS: Complete.

#10 (DHS Data Sharing)

SUMMARY: LAB recommends the WEC include a mechanism in the updated DHS agreement to ensure that the agreement is kept up to date in the future.

STATUS: Complete.

#11 (DOC Data Sharing)

SUMMARY: LAB recommends WEC renew a data sharing agreement with the Wisconsin Department of Corrections (DOC).

STATUS: Complete.

#12 (DOC Data Sharing)

SUMMARY: LAB recommends WEC include a mechanism in the updated DOC agreement to ensure that the agreement is kept up to date in the future.

STATUS: Complete.

#13 (ERIC Data)

SUMMARY: LAB recommends WEC establish a schedule for regularly obtaining each type of ERIC data. ERIC is the Electronic Registration Information Center.

STATUS: Complete.

#14 (Absentee Envelopes)

SUMMARY: LAB recommends review of the absentee ballot certificate envelope and a field on the certificate for the witness's printed name.

STATUS: Complete. The new forms can be viewed at this link: elections. wi.gov/wec-form/official-absentee-ballot-applicationcertification.

#15 (Absentee Envelopes)

SUMMARY: LAB recommends augmenting existing WEC training or providing new training related to the requirement that clerks initial absentee certificate envelopes when issuing ballots during in-person absentee voting.

STATUS: Complete.

#16 (Absentee Envelopes)

SUMMARY: LAB recommends the promulgation of an administrative rule regarding guidance issued by the Commission in 2016 relating to municipal clerks' ability to correct or add missing witness information on returned absentee ballot certificate envelopes.

STATUS: Superseded by litigation. Michael White et al. v. Wisconsin Elections Commission et al. (2022-CV-001008) (Ruling that WEC cannot state that municipal clerks or local election officials can modify or add information to absentee ballot certificate envelopes).

#17 (Ballot Drop Boxes)

SUMMARY: LAB recommends that WEC promulgate an administrative rule that clarifies the use of drop boxes by municipalities.

STATUS: Superseded by litigation. Priorities USA v. WEC, 2024 WI 32, 412 Wis. 2d 594, 8 N.W.3d 429 (Holding that "clerks may lawfully use secure drop boxes in an exercise of their statutorily-conferred discretion.").

#18 (SVD Guidance)

SUMMARY: LAB recommends the Commission promulgate an administrative rule specifying the situations when municipal clerks should not send Special Voting Deputies to residential care facilities and qualified retirement homes. The WEC first discussed Special Voting Deputies in relation to the COVID-19 pandemic prior to the April 7, 2020, Presidential Preference Vote and Spring Election. WEC staff received reports from municipal clerks in early March that facilities normally served by SVDs were closed to visitors due to the COVID-19 pandemic and that SVDs would not be granted access. Care facilities stated an obligation to protect their residents from exposure to the virus following reports that COVID-19 had disproportionately impacted nursing home and care facility residents. The Commission directed clerks to proceed with the statutory process in Wis. Stat. § 6.875(6)(e), allowing absentee ballots to be sent to residents normally served by SVDs if those deputies were not available or were unable to access the facility during SVD voting periods.

STATUS: The six-member Commission voted to determine that this was moot, as reported in 2021 and 2022 reports. The Commission's guidance on SVDs was specific to the April 2020 Spring Election and Executive Order #72.

#19 (Canvass Proceedings)

SUMMARY: LAB recommends the Commission amend a 12-page memorandum issued by the Commission to all Wisconsin election officials on October 22, 2020, to instead inform clerks and board of canvass members about the ability of the canvass to adjourn prior to completion.

STATUS: The Commission considered this item at its December 1, 2021, meeting and assessed that the Recommendation is contrary to Wisconsin law. Wis. Stat. § 7.51(1) expressly requires that canvass proceedings, "shall continue without adjournment."

#20 (Canvass Proceedings)

SUMMARY: LAB recommends the Commission consider promulgation of a rule to allow municipal clerks to adjourn in certain circumstances before ballot counting is complete.

STATUS: The Commission considered this item at its December 1, 2021, meeting and assessed that the Recommendation is contrary to Wisconsin law. Wis. Stat. § 7.51(1) expressly requires that canvass proceedings, "shall continue without adjournment."

#21 (Polling Places)

SUMMARY: LAB recommends the Commission rescind or amend a memorandum issued regarding relocating polling places.

STATUS: The six-member Commission voted to determine that this was moot, as reported in 2021 and 2022 reports. The Commission guidance was specific to 2020 Elections and Executive Order #72.

#22 (Polling Places)

SUMMARY: LAB recommends review of the potential need for a long-term administrative rule or addition to the Commission's legislative agenda to account for future pandemics, natural disasters, and similar catastrophic events that impact polling place locations or necessitate last-minute changes.

STATUS: A rule was drafted but superseded by Wis. Stat. § 5.25(3) regarding emergency relocation of polling places.

#23 (Clerk Training)

SUMMARY: LAB recommends clerks and election inspectors would benefit from additional training from WEC in regard to ballot processing and post-election data entry of election statistics into the statewide voter registration system.

STATUS: Complete.

#24 (Clerk Training)

SUMMARY: LAB recommends the Commission should provide more, or updated, training on the pre-election test of voting equipment required before each election.

STATUS: Complete.

#25 (Clerk Training)

SUMMARY: LAB recommends that WEC provide training to municipal clerks on reviewing Election Day forms after each election and investigating relevant issues, including those related to tamper-evident seals.

STATUS: Complete.

#26 (Electronic Voting Equipment)

SUMMARY: LAB recommends the need for required administrative rule promulgation pertaining to electronic voting equipment and software security.

STATUS: Rule drafted and submitted to LRB. The draft rule documents can be reviewed at this link: elections.wi.gov/draft-rule-update-chapter-el-7-approval-and-security-electronic-voting-equipment-and-ballot.

#27 (Electronic Voting Equipment)

SUMMARY: LAB recommends that WEC should ensure equipment vendors provide additional training to municipal clerks on ensuring that ballots are counted accurately when paper jams occur in electronic voting equipment.

STATUS: Complete.

#28 (Electronic Voting Equipment)

SUMMARY: LAB recommends that WEC should comply with statutes by calculating an error rate for each type of electronic voting equipment used in each General Election.

STATUS: Complete. An error rate of 0.0% was determined by the Commission during the last audit for the 2022 General Election. Materials and minutes of the meeting can be reviewed here: elections.wi.gov/event/wisconsin-elections-commission-february-2023-meeting.

#29 (Complaints)

SUMMARY: LAB recommends that WEC promulgate administrative rules for considering complaints alleging violations of election laws.

STATUS: During the December 1, 2021, meeting, the Commission voted unanimously: "[g]iven Wis. Stat. § 5.05, the WEC declines to undertake an administrative rule making process given that the law is clear, has worked well, and we have complied with the statute."

#30 (Customer Service)

SUMMARY: LAB recommends using newly purchased customer service software to track and report customer contacts.

STATUS: Complete.