

NOTICE OF OPEN AND CLOSED MEETING

Wisconsin Elections Commission Meeting Notice

Regular Meeting
Thursday, April 17, 2025
10:00 A.M.

This meeting will be held in person in Room 121 on the first floor of the Tommy G. Thompson Center, which is located at 201 W Washington Ave., Madison, WI 53703. Participants will also have the option to present public comment virtually, via telephone/Zoom.

WisconsinEye is likely to stream the meeting online, and members of the public and media are encouraged to view coverage at <https://wiseye.org/>. Please check WisconsinEye's schedule at <https://wiseye.org/schedule/> to determine whether it plans to stream the meeting.

Please visit <https://elections.wi.gov/event/commission-meeting-april-17-2025> to view materials for the meeting. Members of the public wishing to provide written comment to the Commissioners should email electioncomments@wi.gov with "Message to Commissioners" in the subject line.

*Members of the public who wish to address the Commission during public comment have the opportunity to do so virtually or in person. Please follow public comment instructions posted at <https://elections.wi.gov/event/commission-meeting-april-17-2025>. Once your request is received, you will receive instructions via email. Please submit requests to present public comment by 4:00 p.m. on Wednesday, April 16, 2025. **Please note that you must sign up ahead of time to be permitted to speak at the meeting. "Walk in" requests the day of the meeting without prior sign up will not be permitted.***

NOTICE OF OPEN AND CLOSED MEETING

OPEN AND CLOSED SESSION AGENDA

- A. **Call to Order**
- B. **Administrator’s Report of Appropriate Meeting Notice**
- C. **Public Comment**
- D. **Written Comments**
- E. **Approval of Previous Meeting Minutes**
 - 1. **March 7, 2025** 1
 - 2. **March 12, 2025** 13
- F. **Discussion and Possible Further Action Relating to Wis. Stat. § 5.06(4) Investigation of City of Madison Clerk regarding 193 Uncounted Absentee Ballots for November 5, 2024, General Election** *(No Materials for this Item)*
- G. **Discussion, Review, and Possible Action Pertaining to Four-Year Maintenance Mailer** 19
- H. **Discussion, Review, and Possible Action Pertaining to the Voter Felon Audit** 27
- I. **Discussion, Review, and Possible Action Pertaining IT Contractor Renewals Under the State of Wisconsin’s “IT Vendor Managed Services and Solution” Contingent Staffing Contract** 41
- J. **Discussion, Review, and Possible Action Pertaining to Timeline and Project Plan for Updates to Elections Manuals** 43
- K. **Discussion, Review, and Possible Action Pertaining to Guidance on Calendar Year Absentee Ballot Requests from Military and Overseas Voters** 63

NOTICE OF OPEN AND CLOSED MEETING

- L. Possible Consideration and Resolution of Wis. Stat. § 5.06 Complaint**
 - 1. Angela Hansen-Winker v. Anthony Decker (EL 25-26)**

- M. Administrative Rulemaking** **67**
 - 1) Possible Discussion, Review, and Action Pertaining to the Election Observer Rule (EL Chapter 4)**
 - 2) Discussion, Review, and Possible Action Pertaining to the Judicial Candidate Privacy Rule (EL Chapter 19)**

- N. Staff Updates to the Commission** **93**

- O. Closed Session***
 - 1. Litigation Update and Consideration of Potential Litigation**
 - 2. Approval of Previous Meeting Minutes**
 - a. March 7, 2025**
 - 3. Voter Felon Audit**
 - 4. Wis. Stat. § 5.05 Complaints**

§ 19.85(1)(g) – The Commission may confer in closed session with legal counsel for the governmental body who is rendering oral or written advice concerning strategy to be adopted by the body with respect to litigation in which it is or is likely to become involved.

§ 19.851 – The Commission’s deliberations concerning an investigation of any violation of the law under the jurisdiction of the Commission shall be in closed session.

§ 19.85(1)(f) – Considering financial, medical, social or personal histories or disciplinary data of specific persons, preliminary consideration of specific personnel problems or the investigation of charges against specific persons except where par. (b) applies which, if discussed in public, would be likely to have a substantial adverse effect upon the reputation of any person referred to in such histories or data, or involved in such problems or investigations.

P. Adjourn

**The Elections Commission will convene in open session but may move to closed session under Wis. Stat. § 19.85(1)(f), (1)(g), (1)(h), and Wis. Stat. §*

NOTICE OF OPEN AND CLOSED MEETING

19.851 and then reconvene into open session prior to adjournment of this meeting. This notice is intended to inform the public that this meeting will convene in open session, may move to closed session, and then may reconvene in open session. Wis. Stat. § 19.85(2).



Wisconsin Elections Commission

201 West Washington Avenue | Second Floor | P.O. Box 7984 | Madison, WI 53707-7984
(608) 266-8005 | elections@wi.gov | elections.wi.gov

Wisconsin Elections Commission

First Quarterly Meeting

Wisconsin Capitol Building, Room 412E

Madison, Wisconsin

10:00 a.m. March 7, 2025

Open Session Minutes

Present: Commissioner Marge Bostelmann, Commissioner Ann Jacobs, Commissioner Don M. Millis, Commissioner Carrie Riepl, Commissioner Robert Spindell Jr., and Commissioner Mark Thomsen, all in person.

Staff present: Ahna Barreau, Cody Davies, Joel DeSpain, Sharrie Hauge, Brandon Hunzicker, Robert Kehoe, Anna Langdon, Angela Sharpe, Riley Willman, Jim Witecha, and Meagan Wolfe, all in person.

A. Call to Order

Commission Chair Jacobs called the meeting to order at 10:01 a.m. and called the roll. All Commissioners were present.

B. Administrator's Report of Appropriate Meeting Notice

Administrator Meagan Wolfe informed the Commission that the meeting was noticed in accordance with Wisconsin's open meetings laws.

C. Public Comment

Adam Follmer

Adam Follmer appeared via Zoom and encouraged the Commission to change the post-election voting equipment audit process.

Discussion.

Eileen Newcomer

Eileen Newcomer appeared in person on behalf of the League of Women Voters Wisconsin and encouraged the Commission to examine its training requirements and canvassing procedures in light of its investigation regarding 193 uncounted absentee ballots in the City of Madison. She noted she also submitted written comments.

Wisconsin Elections Commissioners

Ann S. Jacobs, chair | Marge Bostelmann | Don M. Millis | Carrie Riepl | Robert Spindell | Mark L. Thomsen

Administrator
Meagan Wolfe

Discussion.

Peter Becher

Peter Becher appeared via Zoom and expressed concerns regarding the post-election voting equipment audit process.

Discussion.

Bianca Shaw

Bianca Shaw appeared via Zoom on behalf of All Voting is Local Wisconsin and expressed support for the emergency rule regarding election observers.

D. Written Comments

Chair Jacobs noted receipt of written comments and stated they were distributed to the Commission.

E. Approval of Previous Meeting Minutes

- a. October 4, 2024**
- b. November 1, 2024**
- c. December 2, 2024**
- d. January 2, 2025**
- e. January 27, 2025**

MOTION: Approve the minutes for October 4, 2024, November 1, 2024, December 2, 2024, January 2, 2025, and January 27, 2025.

Moved by Commissioner Bostelmann. Seconded by Commissioner Riepl.

Roll call vote: Bostelmann:	Aye	Riepl:	Aye
Jacobs:	Aye	Spindell:	Aye
Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

F. Discussion and Possible Further Action Relating to Wis. Stat. § 5.06(4) Investigation of City of Madison Clerk regarding 193 Uncounted Absentee Ballots for November 5, 2024, General Election

Staff Attorney Angela Sharpe summarized the findings of the investigation and reviewed possible next steps.

Discussion.

MOTION: Delegate to the Chair and former Chair the authority to conduct or delegate the conduction of depositions of employees of the City of Madison or any person with personal knowledge of this, including the clerk.

Moved by Commissioner Thomsen. Seconded by Commissioner Millis.

Discussion.

Chair Jacobs confirmed with Attorney Sharpe that the Commission had the power to conduct depositions under Wis. Stat. § 5.06(6).

Discussion.

Roll call vote:	Bostelmann:	Aye	Riepl:	Aye
	Jacobs:	Aye	Spindell:	Aye
	Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

MOTION: Direct staff to draft a clerk communication promptly before the April 1 election for the March 12, 2025, Commission meeting to provide guidance to clerks on how to prevent this from happening again.

Moved by Commissioner Millis. Seconded by Commissioner Bostelmann.

Commissioner Millis noted that longer term, after the investigation is finished, the Commission could look into modifying the Election Day Manual consistent with the findings of the investigation.

Roll call vote:	Bostelmann:	Aye	Riepl:	Aye
	Jacobs:	Aye	Spindell:	Aye
	Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

During discussion of a later item, Commissioner Thomsen requested that staff investigate whether they can assign voting participation to the 193 affected voters. Chair Jacobs directed staff to put it on a future agenda.

G. Discussion, Review, and Possible Action Pertaining to the Post-Election Voting Equipment Audit for the 2024 Fall General Election

Elections Specialist Cody Davies summarized the findings of the post-election voting equipment audit for the 2024 Fall General Election.

Discussion.

Commissioner Millis recommended to staff when considering the selection criteria for the 2026 General Election, ranking reporting units in the City of Milwaukee by number of votes cast and requiring a set number of selected reporting units to contain more votes cast than the median for the City.

Discussion.

MOTION: That staff find ways to even out the audit process to take into consideration municipalities' populations.

Moved by Commissioner Spindell. Administrator Wolfe clarified that staff would take recommendations into consideration when developing audit procedures for 2026. Commissioner Spindell did not solicit a second for his motion.

Discussion.

MOTION:

1. The Commission accepts this as the final report of the 2024 Post-Election Voting Equipment Audit.
2. The Commission determines the effective equipment error rate of the 2024 Post-Election Voting Equipment Audit as 0.0% and directs staff to develop additional training and audit resources to mitigate the likelihood of human error in future audits.

Moved by Commissioner Thomsen. Seconded by Commissioner Riepl.

Roll call vote: Bostelmann:	Aye	Riepl:	Aye
Jacobs:	Aye	Spindell:	Aye
Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

H. Discussion of Microsoft CRM Migration

This item was taken up after Item O.

Training and Technology Director Ahna Barreau presented the agenda item.

Discussion.

I. Discussion, Review, and Possible Action Pertaining to the Badger Books Program and Policies

Deputy Administrator Robert Kehoe presented staff's first recommendation regarding connectivity.

Discussion.

Deputy Administrator Kehoe presented staff's third recommendation regarding minimum training requirements. He noted that staff's recommendation regarding the proficiency test is not restricted to the multiple choice format stated in the Commission's materials.

Discussion.

Deputy Administrator Kehoe presented staff's second recommendation regarding vendor hardware, software, and support.

MOTION: Direct staff to create a working group involving staff, representatives of both county and municipal clerks, and other parties that they see fit who are concerned about the availability of private e-poll book vendors. The Commission is not making any decision about the availability of private e-poll book vendors or whether e-poll books should ever be connected to the Internet. The working group will provide more information that the staff can then adjust and present to the Commission at a future date.

Moved by Commissioner Millis. Seconded by Commissioner Bostelmann.

Administrator Wolfe requested that the Commission either specify the “other parties that they see fit,” or remove it from the motion.

AMENDMENT: Direct staff to treat the working group as a governmental body subject to public meetings law. Limit participants to staff and clerks.

Proposed by Commissioner Millis. Accepted by Commissioner Bostelmann.

FRIENDLY AMENDMENT: The clerks will be appointed in equal number by the Republican and Democratic Party.

Proposed by Commissioner Spindell.

Discussion.

Commissioner Millis suggested soliciting appointees from the county and municipal clerks’ associations. Commissioner Bostelmann agreed with this suggestion.

Administrator Wolfe suggested bringing back staff’s plan for what the working group would be at the Commission’s April meeting.

All previous motions were withdrawn.

MOTION: The Commission directs that a work group be established to consider the use of private e-poll books. Staff is directed for the April meeting to provide a proposed membership of that work group to be made up of representatives of county and municipal clerks with the assistance of the organizations who supervise those persons and staff.

Moved by Commissioner Millis. Seconded by Commissioner Bostelmann.

Discussion.

FRIENDLY AMENDMENT: Direct staff to treat the working group as a governmental body subject to public meetings law.

Proposed by Commissioner Millis. Accepted by Commissioner Bostelmann.

AMENDED MOTION: The Commission directs that a work group be established to consider the use of private e-poll books. Staff is directed for the April meeting to provide a proposed membership of that work group to be made up of representatives of county and municipal clerks with the assistance of the

organizations who supervise those persons and staff. Staff is directed to treat the working group as a governmental body subject to public meetings law.

Roll call vote: Bostelmann:	Aye	Riepl:	Aye
Jacobs:	Aye	Spindell:	No
Millis:	Aye	Thomsen:	Aye

Motion carried 5-1.

MOTION: The Commission directs staff to continue to research options for limited connectivity, to include limited testing with Badger Books in not more than three (3) selected municipalities subject to the approval of the Commission after the April 2025 Spring Election. Under no circumstances would connectivity be tested on the date of any election. Staff are to conduct testing in accordance with the purposes and limitations described in this memorandum. The results of testing shall be shared with the Commission when testing is complete.

Moved by Commissioner Spindell. Seconded by Commissioner Millis.

Roll call vote: Bostelmann:	Aye	Riepl:	Aye
Jacobs:	Aye	Spindell:	Aye
Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

MOTION: The Commission directs staff to implement the three minimum training requirements described in the Staff Recommendation in section 3 of this memorandum.

Moved by Commissioner Thomsen. Seconded by Commissioner Bostelmann.

Roll call vote: Bostelmann:	Aye	Riepl:	Aye
Jacobs:	Aye	Spindell:	Aye
Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

The Commission moved to Item R after this item.

J. Discussion, Review, and Possible Action Pertaining to WisVote Record Reconciliation Policies

This item was taken up after Item H.

Technology and Training Director Ahna Barreau presented the agenda item and reviewed staff's recommendations.

Commissioner Millis recommended posting a list of municipalities that require a state override when reconciling an election.

Discussion.

Chair Jacobs suggested asking the legislature to move the deadline by which clerks must complete reconciliation to before the state canvass. Commissioner Riepl expressed doubt regarding the logistics of this proposal.

Discussion.

MOTION: The Commission directs staff to implement the proposals described above and discussed in the meeting in order to formalize agency policy with respect to timely election reconciliation.

Moved by Commissioner Millis. Seconded by Commissioner Thomsen.

Commissioner Millis recommended updating the letterhead.

Chair Jacobs recommended updating the Re: line of the letter to something more urgent such as "OVERDUE ELECTION RECONCILIATION."

Roll call vote:	Bostelmann:	Aye	Riepl:	Aye
	Jacobs:	Aye	Spindell:	Aye
	Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

Cody Davies left the meeting.

K. Administrative Rulemaking [Potential Discussion Item]

- a. Discussion, Review, and Possible Action Pertaining to the Election Observer Rule (EL Chapter 4)**
- b. Discussion, Review, and Possible Action Pertaining to Suspended Emergency Rulemaking and the Associated Permanent Rules (Nomination Paper Challenges, DOC Challenges, Uniform Instructions Rule)**

The Commission did not discuss this item.

L. Discussion, Review, and Possible Action Pertaining to the Interpretation and Implementation of Wis. Stat. § 19.36(14), Identities of Election Officials or Election Registration Officials, Including any Updates or Action on the Attorney General Opinion Request

Attorney Sharpe presented the agenda item.

MOTION: The Wisconsin Elections Commission ("the Commission") agrees with the opinions of Assistant Attorney General Clayton P. Kowski with respect to Question 1 of the January 14, 2025, request to Attorney General Josh Kaul. The Commission directs staff not to make any changes to the statewide voter registration list to comply with the Election Official Identity Statute, Wis. Stat. § 19.36(14) because changes are not required by law. The Commission directs staff to prepare a press release for the public ahead of the law's effective date on July 1, 2025, so that election inspectors understand that their voter record information will not be withheld under the new law.

Moved by Commissioner Riepl. Seconded by Commissioner Bostelmann.

Roll call vote: Bostelmann:	Aye	Riepl:	Aye
Jacobs:	Aye	Spindell:	Aye
Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

M. Discussion, Review, and Possible Action Pertaining to Agency Records Policy, Retention, and Planning

This item was moved to the March 12, 2025, Commission meeting.

N. Consideration and Resolution of Wis. Stat. § 5.06 Complaints

- a. EL 24-39 – Charles Hanna et al. v. Claire Woodall et al.**
- b. EL 24-107 – Beth Kreitzer v. Brad Calder**
- c. EL 24-120 – Michael Nedvidek v. Michelle Nelson**

This item was moved to the March 12, 2025, Commission meeting.

O. Discussion, Review, and Possible Action Pertaining to Commission compliance with Wis. Stat. § 757.07, including Discussion, Review, and Possible Action Pertaining to the Judicial Privacy Rule (EL Chapter 19)

Attorney Sharpe presented the agenda item.

Discussion.

MOTION: The Wisconsin Elections Commission interprets “judicial officer” as set forth in Wis. Stat. § 757.07(1)(e)3 to include those enumerated officials and does not include federal court of appeals judges, federal district court judges, federal magistrate judges, or federal bankruptcy judges. Commission staff are directed to notify the presiding officer and minority leader of each house of the legislature that the Commission requests that the statute be amended to include those federal officers.

Moved by Commissioner Millis. Seconded by Commissioner Thomsen.

Roll call vote: Bostelmann:	Aye	Riepl:	Aye
Jacobs:	Aye	Spindell:	Aye
Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

Regarding the draft information sheet, Chair Jacobs recommended clarifying what judicial officers will need to provide to certify their residential address to the Commission. Additionally, she recommended that judicial officers be instructed to put “Certified to reside in district” in the spot for the residential address rather than “Exempt certification of residence.”

Chair Jacobs clarified that judicial officers must list their municipality for voting purposes on their nomination papers and Declaration of Candidacy. She recommended specifying that to judicial officers in the information sheet, as well as direction to list their mailing address as “Certified to reside in district.”

Chair Jacobs recommended attaching a sample nomination paper header to the information sheet containing the correct language for each box.

Discussion.

Attorney Sharpe clarified that though a judicial officer that obtains a certification of residence is exempt from listing their address on their nomination papers, they are not exempt from ballot access challenges regarding their residency.

Chair Jacobs noted a typo in the draft administrative rule: change “formally” to “formerly” in the middle of page 257.

Chair Jacobs recommended stating in the administrative rule that the judicial officer shall complete a form as adopted by the WEC to file for lawful certification of residence. She also recommended requiring applicants to provide an email address to ensure WEC staff can fulfill their obligations under EL 19.04(a).

Commissioner Millis suggested changing the second “shall” to “should” in EL 19.04(a). Chair Jacobs recommended making the deadline at least three days. She reiterated her recommendation that the form include a space for the applicant to list an email address for Commission contact.

Discussion.

Commissioner Thomsen suggested adding language to the acknowledgement of certification of residence citing Wis. Stat. § 5.06 and clarifying that the recipient is not exempt from ballot access challenges regarding their residency. Commissioner Millis recommended citing the part of the rule that states that.

Commissioner Millis suggested clarifying that the certification of residence must be re-filed each time the candidate runs for office.

Discussion.

Attorney Sharpe noted that EL 19.04(e) should refer to “Judicial Candidate” rather than “Judicial Officer.”

Discussion.

Commissioner Millis and Chair Jacobs recommended striking the latter part of EL 19.04(e) starting with “If the judicial officer has indicated the intend to be a candidate...” and add EL 19.04(f): “If an individual has indicated they intend to be a candidate for judicial office, the Commission shall include the language set forth in EL 19.04(e).” Commissioner Millis also suggested putting the “If the judicial officer...” language at the top of EL 19.04(e).

Chair Millis recommended defining “judicial candidate” in EL 19.01 as “a candidate for a judicial office” using the definition of “judicial office” in Wis. Stat. § 8.10(8)(a).

Chair Jacobs expressed concern regarding the usage of “judicial officials.” Attorney Sharpe recommended changing references to “judicial officials” to “judicial candidates” throughout EL 19 and define “judicial candidate” as indicated above. Chair Jacobs agreed with this recommendation.

Chair Jacobs directed staff to bring the draft rule back to the Commission at the March 12, 2025, meeting along with a mockup of a properly filled out exempt nomination paper header and a mockup of the certification of residence form. She reiterated her recommendation that the form include a space for the applicant to list an email address for Commission contact. She recommended the language, “Please provide us with an email address by which the Commission can contact you regarding any matters relating to this document.”

Discussion.

Attorney Sharpe clarified with Chair Jacobs that staff would bring back to the Commission a revised information sheet, a mockup of a properly filled out exempt nomination paper header, a mockup of the certification of residence form, including the directive that they must list an email address to receive contacts regarding the document, and revisions to the rule text.

Chair Jacobs recommended including the ancillary documents when submitting the draft rule to the legislature.

P. Discussion, Review, and Possible Action Pertaining to the Agency Internal Control Plan

This item was moved to the March 12, 2025, Commission meeting.

Q. Staff Updates to the Commission

This item was moved to the March 12, 2025, Commission meeting.

R. Consideration and Resolution of Wis. Stat. 5.06 Complaint, EL 25-07 – Dixie Stechschulte v. Daniel Crandall

Chief Legal Counsel Jim Witecha presented the agenda item.

Discussion.

MOTION: Approve the letter resolving the Dixie Stechschulte v. Daniel Crandall complaint.

Moved by Commissioner Spindell. Seconded by Commissioner Riepl.

Roll call vote:	Bostelmann:	Aye	Riepl:	Aye
	Jacobs:	Aye	Spindell:	Aye
	Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

S. Closed Session

- a. Litigation Update and Consideration of Potential Litigation**
- b. Approval of Previous Minutes**
 - i. October 4, 2024**
 - ii. September 11, 2024**
 - iii. December 2, 2024**
 - iv. January 12, 2025**
- c. Advisory Opinion Requests**
- d. Wis. Stat. § 5.05 Complaints**

Chair Jacobs noted the Commission would return to open session after finishing closed session business.

MOTION: Move into closed session pursuant to Wis. Stats. § 19.85(1)(g), § 19.85(1)(h), § 19.851, and § 19.85(1)(f).

Moved by Commissioner Thomsen. Seconded by Commissioner Riepl.

Roll call vote:	Bostelmann:	Aye	Riepl:	Aye
	Jacobs:	Aye	Spindell:	Aye
	Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

The Commission left open session at 12:51 p.m. and returned at 2:13 p.m., taking up Item O next.

T. Adjourn

MOTION: To adjourn.

Moved by Commissioner Millis. Seconded by Commissioner Bostelmann.

Roll call vote:	Bostelmann:	Aye	Riepl:	Aye
	Jacobs:	Aye	Spindell:	Aye
	Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

The Commission adjourned at 3:57 p.m.

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March 7, 2025, Wisconsin Election Commission meeting minutes prepared by:

March 7, 2025, Wisconsin Election Commission meeting minutes certified by:

Marge Bostelmann, Commission Secretary

April 17, 2025



Wisconsin Elections Commission

201 West Washington Avenue | Second Floor | P.O. Box 7984 | Madison, WI 53707-7984
(608) 266-8005 | elections@wi.gov | elections.wi.gov

Wisconsin Elections Commission
Special Teleconference Meeting
201 W. Washington Avenue, Second Floor
Madison, Wisconsin
3:00 p.m. March 12, 2025

Open Session Minutes

Present: Commissioner Marge Bostelmann, Commissioner Ann Jacobs, Commissioner Don M. Millis, Commissioner Carrie Riepl, Commissioner Robert Spindell Jr., and Commissioner Mark Thomsen, all by teleconference.

Staff present: Ahna Barreau, Sharrie Hauge, Brandon Hunzicker, Robert Kehoe, Anna Langdon, Riley Willman, Jim Witecha, and Meagan Wolfe, all by teleconference.

A. Call to Order

Commission Chair Jacobs called the meeting to order at 3:01 p.m. and called the roll. All Commissioners were present. Chair Jacobs noted that this meeting was held to address carryover items from the March 7, 2025, Commission meeting.

B. Administrator's Report of Appropriate Meeting Notice

Administrator Meagan Wolfe informed the Commission that the meeting was noticed in accordance with Wisconsin's open meetings laws.

C. Discussion, Review, and Possible Action Pertaining to Communications Strategies for the Avoidance and Noticing of Inadvertently Uncounted Ballots

Elections Supervisor Riley Willman presented the draft clerk communication and noted it was a compilation of already existing guidance. He recommended adding the word "Reminder" to the subject line and adding a "Purpose" section after the introduction section, detailing that the memo is intended as a reminder for clerks and all guidance included in the document is already published in WEC manuals.

MOTION: Approve the clerk communication with the changes proposed by Mr. Willman.

Moved by Commissioner Bostelmann. Seconded by Commissioner Riepl.

Roll call vote:	Bostelmann:	Aye	Riepl:	Aye
	Jacobs:	Aye	Spindell:	Aye
	Millis:	Aye	Thomsen:	Aye

Wisconsin Elections Commissioners

Ann S. Jacobs, chair | Marge Bostelmann | Don M. Millis | Carrie Riepl | Robert Spindell | Mark L. Thomsen

Administrator
Meagan Wolfe

Motion carried 6-0.

D. Discussion, Review, and Possible Action Pertaining to Commission compliance with Wis. Stat. § 757.07, including Discussion, Review, and Possible Action Pertaining to the Judicial Privacy Rule (EL Chapter 19)

Staff Attorney Brandon Hunzicker presented the letter to be sent to the chief officers of the Wisconsin Legislature regarding the Commission's interpretation of "judicial officer" as set forth in Wis. Stat. § 757.07(1)(e)3.

The Commissioners had no questions or comments.

Attorney Hunzicker reviewed redline edits to the letter to judicial officers.

Discussion.

Attorney Hunzicker reviewed redline edits to the judicial privacy draft rule.

Commissioner Millis clarified with Attorney Hunzicker EL 19.06(a)(2) refers to "judicial candidate" rather than "judicial officer or judicial candidate" because the paragraph only applies to judicial candidates.

Attorney Hunzicker continued to review redline edits to the judicial privacy draft rule.

Commissioner Spindell suggested requiring judicial candidates who file a certification of residence to list their county of residence in their nomination paper header and Declaration of Candidacy.

Attorney Hunzicker expressed that a judicial candidate could withhold their full residential address under a straightforward reading of Wis. Stat. § 8.10(8)(a) and could not be required to list their county of residence. Chair Jacobs and Commissioner Millis indicated agreement with that interpretation.

Attorney Hunzicker continued to review redline edits to the judicial privacy draft rule.

Discussion.

Attorney Hunzicker reviewed the template nomination paper and Declaration of Candidacy.

Commissioner Spindell reiterated his preference that judicial candidates list their county of residence on ballot access documents. Commissioner Thomsen indicated agreement with Attorney Hunzicker's reading of Wis. Stat. § 8.10(8)(a) consistent with that of Chair Jacobs and Commissioner Millis.

MOTION: The Commission approves the Info Sheet provided in the March 12 Commission materials, subject to any revisions that received consensus during discussion, and directs staff to provide it to any judicial officer who makes a request pursuant to Wis. Stat. § 757.07(4).

The Wisconsin Elections Commission approves the proposed rulemaking draft for SS 096-24 for permanent rulemaking relating to judicial privacy protection consistent with any edits made during this meeting. The Commission directs staff to proceed with the necessary permanent rulemaking steps for SS

096-24, as outlined in this memo and in materials provided in the March 12 Commission materials. As of April 1, 2025, staff are directed to follow the procedure outlined in the proposed administrative rule for processing certification of residence requests from judicial officers.

Moved by Commissioner Millis. Seconded by Commissioner Bostelmann.

Roll call vote: Bostelmann:	Aye	Riepl:	Aye
Jacobs:	Aye	Spindell:	Aye
Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

E. Discussion, Review, and Possible Action Pertaining to the Agency Internal Control Plan

Chief Administrative Officer Sharrie Hauge presented the agenda item.

MOTION: Approve WEC 2025 Internal Control Plan and authorize staff to submit the Plan to the Chief Clerks of the Senate and Assembly for distribution to the appropriate standing committees and to the State Controller's Office.

Moved by Commissioner Bostelmann. Seconded by Commissioner Thomsen.

Roll call vote: Bostelmann:	Aye	Riepl:	Aye
Jacobs:	Aye	Spindell:	Aye
Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

F. Consideration and Resolution of Wis. Stat. § 5.06 Complaints **a. EL 24-39 – Charles Hanna et al. v. Claire Woodall et al**

Chief Legal Counsel Jim Witecha presented the agenda item. He noted additional materials submitted by the respondent at the request of a Commissioner.

Commissioner Millis stated he had no issue with staff's finding of no probable cause but couldn't go along with the decision letter as drafted, as it did not address issues with the Milwaukee Election Commission's Employee Information Sheet which illegally requests that applicants indicate their marital status and ethnicity.

Commissioner Spindell agreed that the forms requested inappropriate information.

Discussion.

MOTION: Send the decision letter back to staff to redraft consistent with today's discussion, to be brought back at the April 17, 2025, Commission meeting.

Moved by Commissioner Millis. Seconded by Commissioner Spindell.

Roll call vote: Bostelmann:	Aye	Riepl:	Aye
Jacobs:	Aye	Spindell:	Aye
Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

b. EL 24-107 – Beth Kreitzer v. Brad Calder

Attorney Hunzicker presented the agenda item.

MOTION: Approve the letter found at page 193-200 of the Commission’s materials finding probable cause that Clerk Calder violated law or abused his discretion regarding handling of absentee ballots.

Moved by Commissioner Riepl. Seconded by Commissioner Bostelmann.

Roll call vote: Bostelmann:	Aye	Riepl:	Aye
Jacobs:	Aye	Spindell:	Aye
Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

c. EL 24-120- Michael Nedvidek v. Michelle Nelson

Attorney Hunzicker presented the agenda item.

MOTION: The Commission has reviewed Complainant Nedvidek’s written request to withdraw his Wis. Stat. § 5.06(1) complaint filed against Respondent Michelle Nelson, and accordingly declines to issue an order dismissing the matter for the reasons stated during discussion of this matter. Staff are directed to prepare a proposed decision letter for the Commission’s consideration at an upcoming meeting.

Moved by Commissioner Millis. Seconded by Commissioner Thomsen.

Discussion.

Roll call vote: Bostelmann:	Aye	Riepl:	Aye
Jacobs:	Aye	Spindell:	Aye
Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

G. Discussion, Review, and Possible Action Pertaining to Agency Records Policy, Retention, and Planning

Attorney Witecha presented the agenda item.

Discussion.

MOTION: The Commission hereby authorizes staff to take the necessary steps to begin preparations for renewing agency Records Disposition Authorizations sunseting in 2027, to prepare and submit new Records Disposition Authorizations requests to the State Public Records Board in accordance with this memo and the Commission's discussion at its March 12, 2025, meeting, and to publish and implement the Electronic Records Management Policy and associated practices as directed by the Commission at its March 12, 2025, meeting and operationalized by the WEC Administrator and Commission Records Officer. Staff will return and present Records Disposition Authorization paperwork, drafts, or proposed edits to the Commission as may be necessary or prudent.

Moved by Commissioner Thomsen. Seconded by Commissioner Millis.

Roll call vote:	Bostelmann:	Aye	Riepl:	Aye
	Jacobs:	Aye	Spindell:	Aye
	Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

H. Staff Updates to the Commission

Administrator Wolfe presented the agenda item. She answered questions from Commissioner Spindell regarding Badger Voters revenue and federal grant funding. She answered questions from Commissioner Thomsen regarding changes to federal support of election security initiatives.

I. Adjourn

MOTION: To adjourn.

Moved by Commissioner Bostelmann. Seconded by Commissioner Riepl.

Roll call vote:	Bostelmann:	Aye	Riepl:	Aye
	Jacobs:	Aye	Spindell:	Aye
	Millis:	Aye	Thomsen:	Aye

Motion carried 6-0.

The Commission adjourned at 5:00 p.m.

#####

March 12, 2025, Wisconsin Election Commission meeting minutes prepared by:

March 12, 2025, Wisconsin Election Commission meeting minutes certified by:

Marge Bostelmann, Commission Secretary

April 17, 2025



Wisconsin Elections Commission

201 West Washington Avenue | Second Floor | P.O. Box 7984 | Madison, WI 53707-7984
(608) 266-8005 | elections@wi.gov | elections.wi.gov

DATE: For the April 17th, 2025, Commission Meeting

TO: Commissioners, Wisconsin Elections Commission

FROM: Staff, Wisconsin Elections Commission Staff

SUBJECT: 2025 Four Year Voter Record Maintenance Process

1. Background

Wisconsin Statutes § 6.50 requires the Commission, no later than June 15 following a General Election, to mail notices to all voters who have been registered to vote for the past four years but have not voted. The notice indicates that a voter's registration will be deactivated unless the voter requests continuation of their registration within 30 days.

Voters who receive the notice can request continuation in several ways. The voter can sign and return the "Application for Continuation of Registration" section of the "Notice of Suspension of Registration" postcard. A written request for continuation of registration can also be made in person or sent by mail. A voter whose name or address has changed must reregister. The postcard directs voters who believe they received it in error to contact their municipal clerk or the Commission, and the card provides voters with the Commission's toll-free number.

If the notice is returned as undeliverable or if the voter does not respond within 30 days, the Commission deactivates the voter's registration in the statewide voter registration system. Voters who are deactivated do not appear on the poll list on Election Day and must reregister in order to vote. Commission staff plan to complete the deactivation process on or before July 31, 2025. Returned postcards resulting in the deactivation of a registration (those marked undeliverable or indicating a change in status such as "voter deceased") are retained with the original voter registration documents until the expiration of the four-year records retention deadline per Wis. Stat. §7.23(1)(c).

Not later than August 1, the Commission must post voter record maintenance statistics on the agency website. Wis. Stat. §6.50 (2r). The data must include:

- a. The total number of notices mailed.
- b. The number of notices returned as undeliverable.
- c. The number of notices that were returned requesting continuation of registration.
- d. The number of notices that were returned requesting cancellation of registration.
- e. The number of notices returned with an indication that the named elector is deceased.
- f. The number of notices that were not returned.

Wisconsin Elections Commissioners

Ann S. Jacobs, chair | Marge Bostelmann | Don M. Millis | Carrie Riepl | Robert Spindell | Mark L. Thomsen

Administrator
Meagan Wolfe

- g. The number of electors who received notices and whose status changed from eligible to ineligible. Wis. Stat. §6.50(2r).

The full statistics from the 2023 mailing are available here:

[2023 Four-Year Voter Record Maintenance Statistics | Wisconsin Elections Commission](#)

2. Mailer Design History

Wis. Stat. § 6.50(1) requires the notice to electors to be in “substantially the following form:”

NOTICE OF SUSPENSION OF REGISTRATION

You are hereby notified that your voter registration will be suspended, according to state law, for failure to vote within the previous 4-year period, unless you apply for continuation of your registration within 30 days. You may continue your registration by signing the statement below and returning it to the office of the municipal clerk (mailing address and telephone number of office of municipal clerk or board of election commissioners) by mail or in person.

APPLICATION FOR CONTINUATION OF REGISTRATION

I hereby certify that I still reside at the address at which I am registered and apply for continuation of registration.

Signed

Present Address

If you have changed your residence within this municipality or changed your name, please contact the office of the municipal clerk (mailing address and telephone number of office of municipal clerk or board of election commissioners) to complete a change of name or address form.

[Office of clerk or board of election commissioners

Address

Telephone]

Earlier iterations of the four-year maintenance process, under the Government Accountability Board (GAB), adhered closely to the statutory language. These mail pieces produced a modest response (see Table 1 below) but also generated many calls from confused members of the public.

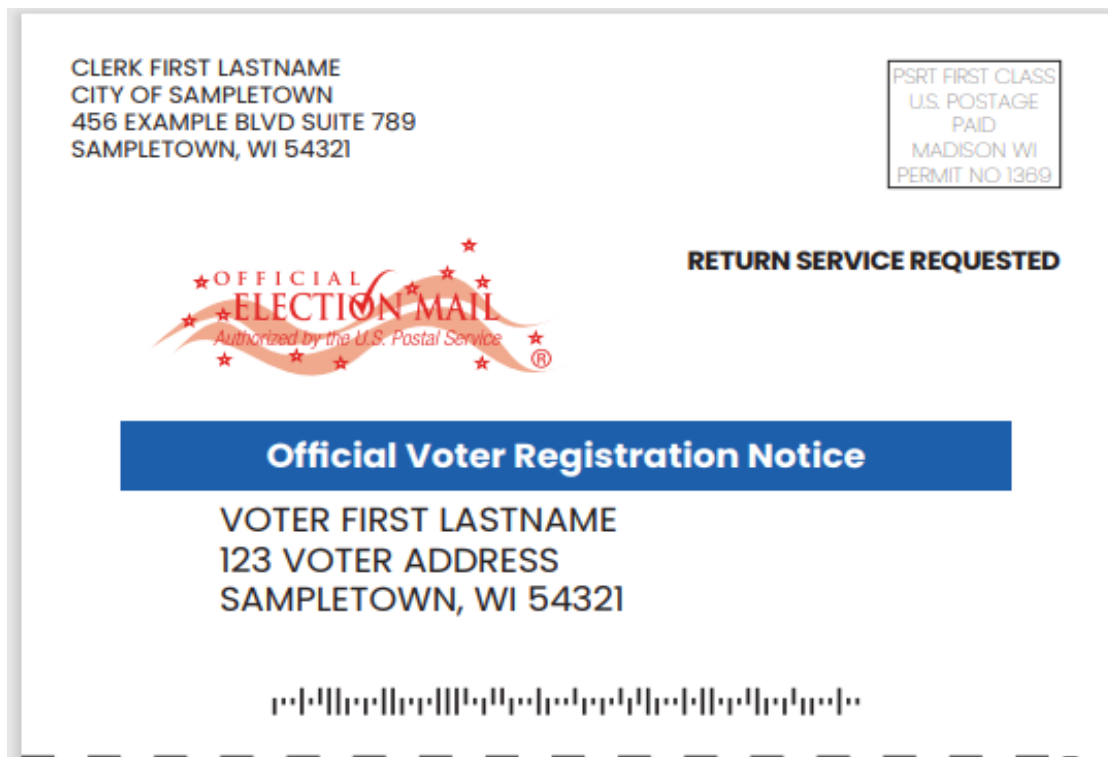
In 2019, the WEC staff carried out public usability testing to assess and improve the postcard design using feedback from actual voters who had not been previously exposed to the program. A revised version of the postcard was presented to the Commission at a meeting in September 2022. This design retained the successful aspects of the previous one while integrating recommendations put forth by the Commissioners. Changes included color print, updates to language to make it pertain to voter registration, along with enlargement of select text, while still maintaining the elements required by state statutes.

Table 1: Response Time by year

Year	2023	2021	2019	2017	2015
Total Notices Mailed	116,051	186,982	113,314	381,495	97,981
Requested Continuation	7,469	12,121	15,974	28,1R69	9,610
Undeliverable	30,856	62,853	30,342	153,416	25,179
Requested Deactivation	11	38	23	250	26
Deceased	387	736	600	799	342
Deactivated for Other Reason	296	121	187	7,692	N/A
Duplicates Merged	235	385	271	532	N/A
No Response	77,726	112,008	66,998	189,702	63,186
Total Deactivated	108,378	174,307	95,939	351,733	83,070

3. Proposed Mailer Design

Staff propose utilizing the same postcard design implemented in 2023 due to the positive feedback received at that time. Included here is a visual of the updated postcard. Other than the dates, there are no plans for any additional changes for the upcoming mailing.



Exterior Side 1-(2025 version Voter Address)

STATE OF WISCONSIN
Notice of Voter
Registration Suspension
Election records show you have not voted in the last four years.


Stay registered to vote

- if your address or name hasn't changed, sign and return the other half of this card.
- If your address is different visit myvote.wi.gov to update your voter information.

Need Help? Call Wisconsin Elections Commission 1-866-868-3947.

¿Necesitas ayuda? Llama a su secretario municipal o visita myvote.wi.gov/es-es

Statutory Notice of Suspension of Registration. You are hereby notified that **your voter registration will be suspended**, according to state law, for failure to vote within the previous 4-year period, **unless you apply for continuation of your registration within 30 days**. You may continue your registration by signing the attached statement and returning it to the office of the municipal clerk by mail or in person. Wis. Stat. sec 6.50(1).



If you do not respond to this card you will no longer be registered to vote in Wisconsin

Exterior Side 2 (2025 version “notice” side)

Stay Registered To Vote

Still at the same address?
 Sign the statement below and return it by **July 15, 2025** to stay registered.

I hereby certify that I still reside at the address listed below, have not had a change of name, and want to stay registered to vote in Wisconsin.

Signed: _____ on: ____/____/2025

4YRM2025

VOTER FIRST LASTNAME
 123 VOTER ADDRESS
 SAMPLETOWN, WI 54321



CITY OF SAMPLETOWN - EXAMPLE COUNTY
 70077777



9 0 2 2 1 1 2 2 0 9

Interior Side 3 (2025 version Optional Certification)



4. Proposed Timeline

The timeline for four-year maintenance is established by Wis. Stat. § 6.50(1), which states that the postcard must be sent to qualifying voters by June 15. To meet this mandatory deadline, a final design must be approved by the Commission at the April 17th meeting. This will allow staff time to finalize the image file and send to DOA printing and distribution in time for proofing, printing, metering, and mailing. Delays in approving a design or language on the postcard would jeopardize adherence to the statutory deadline.

2025 Four-Year Voter Record Maintenance Timeline

May 1, 2025	Finalize Mailing Design with DOA printing
May 5, 2025 – May 16, 2025	Deadline for municipal clerks to enter participation for Spring Election Wis. Stat § 6.275. Commission IT staff creates the list of voters identified as not having voted in four years after this date. List sent to DOA printing 5 to 6 weeks prior to the deadline for mailing the Notices of Suspension.

June 15, 2025	Statutory deadline for WEC to mail the Notices of Suspension of Registration Mailing. Wis. Stat. § 6.50(1).
June 15, 2023 – July 15, 2025	Clerks deactivate voter records for notices returned as undeliverable and update the status of voters who request continuation of registrations from Active – Suspended to Active – Registered. Wis. Stat. § 6.50(2).
July 31, 2025	Commission IT staff run an automated job to deactivate any voters who have not requested Continuation of Registration. Wis. Stat. § 6.50(2). Fifteen additional days are provided for clerks to process voter Requests for Continuation received by July 15, 2025.
August 1, 2025	Commission publishes the required statistics. Wis. Stat. § 6.50(2r).

5. Estimated Volume and Cost

A preliminary estimate of the mailing size indicates that 215,849 people qualify to receive the four-year maintenance mailer this year. Previous mailings varied widely in size from a low of 97,981 to a high of nearly 400,000. The majority of current voters eligible for the mailing are currently in Active-Registered status as shown in Table 2 below.

Table 2 (2025 Four Year Maintenance Status and Preliminary Count)

Voter Status	Count
Active Registered	144901
Active Movers	70942
Suspended	3
TOTAL	215849

Table 3 (Four Year Maintenance Volume History)

Year	Total Notices Mailed	Requested Continuation	Undeliverable
2023	118,743	7,469	30,856
2021	187,754	12,121	62,853
2019	113,314	15,974	30,342
2017	381,495	28,169	153,416
2015	97,981	9,610	25,179

Final mailing costs will not be determined until the order is finalized; however, we do have a preliminary estimate of the cost from the Department of Administration. The cost of publishing the postcards would be approximately \$15,386.97. The cost of postage, as well as processing and handling, for the 215,849 postcards will be \$133,397. These combine to a total cost estimate of \$148,783.97.

6. Recommendation

Commission staff recommend approving the Proposed Mailer Design in section 3 of this report and the plan and timeline in this report. The following recommended motion is included for the Commission's consideration.

RECOMMENDED MOTION: The Commission authorizes staff to proceed with plans for mailing four-year voter record maintenance notices to voters using the postcard designs and the schedule proposed in the April 17th, 2025, staff memorandum.



Wisconsin Elections Commission

201 West Washington Avenue | Second Floor | P.O. Box 7984 | Madison, WI 53707-7984
(608) 266-8005 | elections@wi.gov | elections.wi.gov

DATE: For the April 17, 2025, Commission Meeting

TO: Commissioners, Wisconsin Elections Commission

FROM: Staff, Wisconsin Elections Commission

SUBJECT: Voter Felon Audit

The Voter Felon Audit is a required post-election comparison of voters who cast a ballot at an election with the list of people who were under Department of Corrections (DOC) supervision for a felony conviction at the time the vote was cast. Wis. Stat. §6.56(3m). The audit is conducted for any election that has a state or federal office on the ballot.

The Voter Felon Audit occurs in several stages. First, the matches are reviewed by DOC; the next stage is a review from municipal clerks, who also provide any pertinent documentation; and then WEC staff perform the final review and provide consolidated notes on each record prior to making referrals to county district attorneys, who then conduct their own investigations.

The process provides the Commission with the ability to identify any potential voter/felon matches and it also allows the Commission to identify any discrepancies with the matches. It is the final check in identifying potential felon participation in an election, should such activity not be discovered earlier through other statutory required processes, such as the felon list check by election officials at the polls. The process also ensures that election officials at all levels have performed their due diligence before cases are referred to a district attorney.

If a district attorney does not provide an update on a Commission voter/felon referral within six years of the election date, staff is to consider the referral closed and discontinue providing updates to the Commission.¹

As of March 20, 2025, Voter Felon Audits have been performed for all previous elections through the November 5, 2024 General Election. The audit is not yet complete for the February 18, 2025, Spring Primary, as clerks have not finished providing participation data.

Staff are also providing an update on the status of the past Voter Felon Audits and District Attorney response information. Attached to this memorandum are statistics regarding the number of initial matches between records of voters and records of felons, as well as the disposition of the cases referred to district attorneys that the Commission has been made aware of. Additional details regarding specific cases are included in the Commission's supplemental materials folder.

¹ Standard created by unanimous vote of the Wisconsin Elections Commission on September 21, 2022.

Wisconsin Elections Commissioners

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Administrator
Meagan Wolfe

DA Tracker - 2020 SPRING PRIMARY

County	Stage	Date Original Notice Sent	DA REPORT	Status
CLARK	5 - Referred to DA	4/22/2022	2/3/2023	Under Investigation.

DA Tracker - 2020 SPRING ELECTION &

County	Stage	Date Original Notice Sent	DA REPORT	Status
MILWAUKEE	5 - Referred to DA	4/15/2022	3/24/2025	Under Investigation.

DA Tracker - 2020 PARTISAN PRIMARY

County	Stage	Date Original Notice Sent	DA REPORT	Status
DOOR	5 - Referred to DA	10/1/2021		

DA Tracker - 2020 GENERAL ELECTION

County	Stage	Date Original Notice Sent	DA REPORT	Status
ASHLAND	5 – Referred to DA	8/23/2021		
BROWN	5 – Referred to DA	9/17/2021	1/4/2024	Charges Filed.
BROWN	5 – Referred to DA	9/17/2021	11/18/2021	Charges Filed.
COLUMBIA	5 – Referred to DA	8/26/2021	9/5/2021	Under Investigation.
COLUMBIA	5 – Referred to DA	8/20/2021		
COLUMBIA	5 – Referred to DA	8/25/2021		
FLORENCE	5 – Referred to DA	8/20/2021		
FOND DU LAC	5 – Referred to DA	9/21/2021	1/27/2022	Charges Filed.
KENOSHA	5 – Referred to DA	4/22/2022	1/23/2024	Under Investigation.
MARATHON	5 – Referred to DA	8/19/2021		
MILWAUKEE	5 – Referred to DA	2/24/2022	3/24/2025	Under Investigation.
PIERCE	5 – Referred to DA	8/30/2021		
POLK	5 – Referred to DA	9/20/2021		previously updated as charges filed based off CCAP felony case, but was for another charged. Current status that it was referred.
RACINE	5 – Referred to DA	8/20/2021		

County	Stage	Date Original Notice Sent	DA REPORT	Status
RUSK	5 – Referred to DA	8/23/2021	8/17/2022	Under Investigation.
SHEBOYGAN	5 – Referred to DA	8/23/2021		
WALWORTH	5 - Referred to DA	3/1/2022		
WALWORTH	5 – Referred to DA	9/16/2021		
WALWORTH	5 – Referred to DA	8/20/2021	8/20/2021	Under Investigation.
WAUKESHA	5 – Referred to DA	8/19/2021		
WAUKESHA	5 – Referred to DA	8/20/2021	8/17/2022	Under Investigation.
WAUKESHA	5 – Referred to DA	8/27/2021		
WAUKESHA	5 – Referred to DA	9/8/2021		
WAUKESHA	5 – Referred to DA	8/23/2021		
WAUKESHA	5 – Referred to DA	8/20/2021		
WAUKESHA	5 – Referred to DA	9/16/2021		
WAUPACA	5 – Referred to DA	8/20/2021		
WAUPACA	5 – Referred to DA	9/17/2021		
WINNEBAGO	5 – Referred to DA	8/20/2021	6/22/2022	Under Investigation.
WINNEBAGO	5 – Referred to DA	8/20/2021	6/22/2022	Under Investigation.
WINNEBAGO	5 – Referred to DA	8/20/2021	6/22/2022	Under Investigation.

DA TRACKER - 2022 SPRING PRIMARY

County	Stage	Date Original Notice Sent	DA REPORT	Status
ASHLAND	5 - Referred to DA	6/15/2022		

DA TRACKER - 2022 SPRING ELECTION

County	Stage	Date Original Notice Sent	DA REPORT	Status
MENOMINEE	5 - Referred to DA	8/3/2023		
WAUKESHA	5 - Referred to DA	4/10/2023		

DA TRACKER - 2022 PARTISAN PRIMARY

County	Stage	Date Original Notice Sent	DA REPORT	Status
CLARK	5 - Referred to DA	4/10/2023		

DA TRACKER - 2022 GENERAL ELECTION

County	Stage	Date Original Notice Sent	DA REPORT	Status
COLUMBIA	5 - Referred to DA	8/7/2023		
JACKSON	5 - Referred to DA	8/3/2023		

County	Stage	Date Original Notice Sent	DA REPORT	Status
MILWAUKEE	5 - Referred to DA	8/3/2023	3/24/2025	Under Investigation.
MILWAUKEE	5 - Referred to DA	8/3/2023	3/24/2025	Under Investigation.
MILWAUKEE	5 - Referred to DA	8/3/2023	3/24/2025	Under Investigation.
MILWAUKEE	5 - Referred to DA	8/3/2023	3/24/2025	Charges Filed.
MILWAUKEE	5 - Referred to DA	8/3/2023	3/24/2025	Charges Filed.
MILWAUKEE	5 - Referred to DA	8/3/2023	3/24/2025	Under Investigation.
MILWAUKEE	5 - Referred to DA	8/3/2023	3/24/2025	Under Investigation.
MONROE	5 - Referred to DA	8/3/2023		
RACINE	5 - Referred to DA	8/15/2023		
RACINE	5 - Referred to DA	8/3/2023		
ROCK	5 - Referred to DA	8/3/2023		
WAUKESHA	5 - Referred to DA	8/3/2023	10/30/2023	Under Investigation.

DA TRACKER - 2023 SPRING PRIMARY

County	Stage	Date Original Notice Sent	DA REPORT	Status
DANE	5 - Referred to DA	7/15/2024		

DA TRACKER - 2023 SPRING ELECTION

County	Stage	Date Original Notice Sent	DA REPORT	Status
MILWAUKEE	5 - Referred to DA	7/19/2024	3/24/2025	Under Investigation

DA TRACKER - 2024 SPRING ELECTION & PRES. P

County	Stage	Date Original Notice Sent	DA REPORT	Status
MILWAUKEE	5 - Referred to DA	3/6/2025	3/24/2025	Under Investigation
MILWAUKEE	5 - Referred to DA	3/6/2025	3/24/2025	Under Investigation
MONROE	5 - Referred to DA	2/20/2025		
RACINE	5 - Referred to DA	2/20/2025		

DA TRACKER - 2024 PARTISAN PRIMARY

County	Stage	Date Original Notice Sent	DA REPORT	Status
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County	Stage	Date Original Notice Sent	DA REPORT	Status
MILWAUKEE	5 - Referred to DA	3/20/2025	3/24/2025	Under Investigation
MILWAUKEE	5 - Referred to DA	3/20/2025	3/24/2025	Under Investigation
MILWAUKEE	5 - Referred to DA	3/20/2025	3/24/2025	Under Investigation
MILWAUKEE	5 - Referred to DA	3/20/2025	3/24/2025	Under Investigation

DA TRACKER - 2024 GENERAL ELECTION

County	Stage	Date Original Notice Sent	DA REPORT	Status
BROWN	3 - Clerk Review			
BROWN	3 - Clerk Review			
DANE	3 - Clerk Review			
DANE	3 - Clerk Review			
DANE	3 - Clerk Review			
DANE	3 - Clerk Review			
DANE	3 - Clerk Review			
DANE	3 - Clerk Review			
DANE	3 - Clerk Review			
DODGE	3 - Clerk Review			
DOUGLAS	3 - Clerk Review			
DUNN	3 - Clerk Review			
EAU CLAIRE	3 - Clerk Review			
GRANT	3 - Clerk Review			
JACKSON	3 - Clerk Review			
JEFFERSON	3 - Clerk Review			
JEFFERSON	3 - Clerk Review			
JUNEAU	3 - Clerk Review			
KENOSHA	3 - Clerk Review			
KENOSHA	3 - Clerk Review			
KEWAUNEE	3 - Clerk Review			
LINCOLN	3 - Clerk Review			
MARATHON	3 - Clerk Review			
MENOMINEE	3 - Clerk Review			
MILWAUKEE	3 - Clerk Review			
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MILWAUKEE	3 - Clerk Review			
MILWAUKEE	3 - Clerk Review			

County	Stage	Date Original Notice Sent	DA REPORT	Status
WAUPACA	3 - Clerk Review			
WINNEBAGO	3 - Clerk Review			
WOOD	3 - Clerk Review			
WOOD	3 - Clerk Review			

OPEN VOTER FELON AUDITS

ELECTION	Number of voters matched with felons per Election	Number of matches referred to district attorneys	Number of referrals closed by DA without charges or case dismissed	Number of referrals resulting in a conviction	Number of remaining referrals with current charges filed status	Number of matches or cases referred remaining open or under investigation	Number of matches closed	Total number of voters	Referrals as a percentage of total number of voters
11/5/2024 General Election	138	all records are in Stage 3, clerk review - once they provide info this # will change					52	3,438,431	cannot be provided yet
8/13/2024 Partisan Primary	7	4	0	0	0	4	3	1,293,730	0.000309%
4/2/2024 Spring Election and Pres. Pref	6	4	0	0	0	4	2	1,236,110	0.000324%
4/4/2023 Spring Election	24	6	3	2	0	1	23	1,857,786	0.000323%
2/21/2023 Spring Primary	8	2	1	0	0	1	7	969,454	0.000206%
11/8/2022 General Election	50	27	12	1	2	12	36	2,668,891	0.001012%
8/9/2022 Partisan Primary	10	4	3	0	0	1	9	1,229,501	0.000325%
4/5/2022 Spring Election	12	8	6	0	0	2	10	982,884	0.000814%
2/15/2022 Spring Primary	6	3	2	0	0	1	5	241,450	0.001242%
11/3/2020 General Election	147	102	51	20	3	28	116	3,297,524	0.00309%
8/11/2020 Partisan Primary	11	4	3	1	0	1	10	959,348	0.00042%
4/7/2020 Spring Election/Pres. Pref.	32	8	6	1	0	1	31	1,605,912	0.00050%
2/18/2020 Spring Primary	15	6	4	1	0	1	14	729,307	0.00082%

FULLY CLOSED VOTER FELON AUDITS

All matches have resolution

ELECTION	Number of voters matched with felons per Election	Number of matches referred to district attorneys	Number of referrals closed by DA without charges or case dismissed	Number of referrals resulting in a conviction	Number of remaining referrals with current charges filed status	Number of matches or cases referred remaining open or under investigation	Number of matches closed	Total number of voters	Referrals as a percentage of total number of voters
4/6/2021 Spring Election	8	4	3	1	0	0	8	953,414	0.00042%
2/16/2021 Spring Primary	2	2	2	0	0	0	2	339,805	0.00059%
5/12/2020 Special Election Rep. Congress 7	3	1	1	0	0	0	3	191,720	0.000522%
2019 Spring Election	10	3	2	1	0	0	10	1,225,087	0.000327%
2/20/2018 Spring Primary	3	0	0	0	0	0	3	541,627	0.000000%
4/4/2017 Spring Election	4	4	4	0	0	0	4	747,671	0.000535%
2/16/2016 Spring Primary	7	3	3	0	0	0	7	578,083	0.000519%
4/7/2015 Spring Primary	6	3	3	0	0	0	6	858,683	0.000699%
8/12/2014 Partisan Primary Election	10	1	0	1	0	0	10	638,677	0.000157%
4/1/2014 Spring Election	8	5	3	2	0	0	8	506,566	0.000987%
4/2/2013 Spring Election	8	3	2	1	0	0	8	889,008	0.000337%
2/19/2013 Spring Primary	1	0	0	0	0	0	1	374,631	0.000000%
8/4/2012 Partisan Primary	3	2	2	0	0	0	3	851,572	0.000235%
6/5/2012 June 5 Recall Election	53	22	17	5	0	0	53	2,516,371	0.000874%
5/8/2012 Recall Primary/Election	13	4	2	2	0	0	13	1,360,750	0.000294%
4/3/2012 Spring Election and Pres. Pref	13	7	6	1	0	0	13	1,144,351	0.000612%
2/21/2012 Spring Primary	3	2	2	0	0	0	3	139,343	0.001435%
4/5/2011 Spring Election	16	7	6	1	0	0	16	1,524,528	0.000459%
2/15/2011 Spring Primary	5	2	2	0	0	0	5	444,766	0.000450%
11/2/2010 General Election	60	21	16	5	0	0	60	2,185,017	0.000961%
9/14/2010 Partisan Primary	8	3	3	0	0	0	8	930,511	0.000322%
4/6/2010 Spring Election	5	2	1	1	0	0	5	574,130	0.000348%
2/16/2010 Spring Primary	1	0	0	0	0	0	1	152,532	0.000000%

CLOSED VOTER FELON AUDITS - 6-YEAR TIMELINE SET BY COMMISSION PASSED

MAY STILL HAVE UNRESOLVED MATCHES, BUT CLOSED AS 6 YEARS AFTER ELECTION DATE

ELECTION	Number of voters matched with felons per Election	Number of matches referred to district attorneys	Number of referrals closed by DA without charges or case dismissed	Number of referrals resulting in a conviction	Number of remaining referrals with current charges filed status	Number of matches or cases referred remaining open or under investigation	Number of matches closed	Total number of voters	Referrals as a percentage of total number of voters
2/19/2019 Spring Primary	2	2	1	0	0	1	1	8,295	0.048222%
11/6/2018 General Election	79	52	32	4	1	15	63	2,688,879	0.001934%
8/14/2018 Partisan Primary	15	9	5	1	0	3	12	1,043,074	0.000863%
4/3/2018 Spring Election	8	2	0	1	0	1	7	1,017,513	0.000197%
4/7/2015 Spring Election	9	6	3	0	0	3	6	858,683	0.000699%
11/4/2014 General Election	229	43	25	7	0	11	218	2,420,811	0.001776%
11/6/2012 General Election	89	36	24	7	0	5	84	3,085,450	0.001167%
11/8/2016 General Election	111	79	57	16	1	5	105	3,004,051	0.002630%
8/9/2016 Partisan Primary	4	2	2	0	0	1	3	645,619	0.000310%
4/5/2016 Spring Election & Pres. Pref.	33	24	12	5	0	7	26	2,130,221	0.001127%

A motion was made and approved unanimously from the commission at the September 21, 2022 meeting, that if a district attorney's office does not provide an update within 6 years of the election date, staff should consider the referral closed and discontinue providing updates to the commission

NO MATCHES IDENTIFIED VOTER FELON AUDITS

ELECTION	Number of voters matched with felons per Election	Number of matches referred to district attorneys	Number of referrals closed by DA without charges or case dismissed	Number of referrals resulting in a conviction	Number of remaining referrals with current charges filed status	Number of matches or cases referred remaining open or under investigation	Number of matches closed	Total number of voters	Referrals as a percentage of total number of voters
7/30/2024 Special Election State Senate District 4	0	0	0	0	0	0	0	5,081	0.000000%
7/2/2024 Special Partisan Primary State Senate District 4	0	0	0	0	0	0	0	7,150	0.000000%
2/20/2024 Spring Primary	0	0	0	0	0	0	0	145,452	0.000000%
7/18/2023 Special Election Assembly 24	0	0	0	0	0	0	0	12,032	0.000000%
7/13/2021 Special Election Assembly 37	0	0	0	0	0	0	0	6,864	0.000000%
6/15/2021 Special Partisan Primary Assembly 37	0	0	0	0	0	0	0	4,970	0.000000%
12/30/2019 Special Primary Rep. Congress 7	0	0	0	0	0	0	0	ran with 2020 Spring Primary - cannot be separated	0.000000%
4/30/2019 Special Election Assembly 64	0	0	0	0	0	0	0	6,581	0.000000%
6/12/2018 Special Election State Senate 1 Special Election Assembly 42	0	0	0	0	0	0	0	23,342 10,760	0.000000%
5/15/2018 Special Partisan Primary State Senate 1 Special Partisan Primary Assembly 42	0	0	0	0	0	0	0	10,149 2,851	0.000000%
1/6/2018 Special Election Assembly 58 Special Election Assembly 66 Special State Senate 10	0	0	0	0	0	0	0	4,335 872 22,043	0.000000%
12/19/2017 Special Primary Assembly 66 Special Primary Assembly 58 Special Primary State Senate 10	0	0	0	0	0	0	0	2,960 3,701 11,156	0.000000%
2/21/2017 Spring Primary	0	0	0	0	0	0	0	375,216	0.000000%
9/29/2015 Special Election Assembly 99	0	0	0	0	0	0	0	1,591	0.000000%
9/1/2015 Special Primary Assembly 99	0	0	0	0	0	0	0	3,422	0.000000%

7/21/2015 Special Election State Senate 33	0	0	0	0	0	0	0	10,012	0.000000%
6/23/2015 Special Primary State Senate 33	0	0	0	0	0	0	0	11,449	0.000000%
2/18/2014 Spring Primary	0	0	0	0	0	0	0	4,310	0.000000%
12/17/2013 Special Election Assembly 82	0	0	0	0	0	0	0	6,170	0.000000%
11/19/2013 Special Election Assembly 69 Special Election Assembly 21 Special Primary Assembly 82	0	0	0	0	0	0	0	7,002 8,095 n/a	0.000000%
10/22/2013 Special Primary Assembly 21 Special Primary Assembly 69	0	0	0	0	0	0	0	3980 5.712	0.000000%
12/4/2012 Special Election State Senate 33	0	0	0	0	0	0	0		0.000000%
11/8/2011 Special Election Assembly 95	0	0	0	0	0	0	0		0.000000%
10/11/2011 Special Primary Assembly 95	0	0	0	0	0	0	0		0.000000%
8/16/2011 Recall Election State Senate 12 Recall Election State Senate 22	0	0	0	0	0	0	0		0.000000%
8/9/2011 Special Election Assembly 48 Recall Election State Senate 8 Recall Election State Senate 32 Recall Election State Senate 2 Recall Election State Senate 18 Recall Election State Senate 14 Recall Election State Senate 10	0	0	0	0	0	0	0		0.000000%
7/19/2011 Recall Election State Senate 30 Primary Recall State Senate 22 Primary Recall State Senate 12	0	0	0	0	0	0	0		0.000000%
7/12/2011 Special Primary Assembly 48 Primary Recall State Senate 8 Primary Recall State Senate 32 Primary Recall State Senate 2 Primary Recall State Senate 18 Primary Recall State Senate 14 Primary Recall State Senate 10	0	0	0	0	0	0	0		0.000000%
5/3/2011 Spring Special Election	0	0	0	0	0	0	0		



Wisconsin Elections Commission

201 West Washington Avenue | Second Floor | P.O. Box 7984 | Madison, WI 53707-7984
(608) 266-8005 | elections@wi.gov | elections.wi.gov

DATE: For the April 17, 2025, Commission Meeting

TO: Members, Wisconsin Elections Commission

FROM: Staff, Wisconsin Elections Commission Staff

SUBJECT: Developer Renewals

Approval to Renew the Annual IT Developer Contracts

Consistent with the Commission's past practices, the 2025-27 biennial budget request approval, and the 2018-2024 HAVA grant spending approval, WEC staff requests the Commission approve renewal of IT development contracts for FY26 and FY27 at the current rate of not more than \$1,175,000 annually. This will allow the agency to maintain all current IT development contractors through the 2026 election cycle. Currently, all contracts are scheduled to expire on June 30, 2025. Although the Commission already approved this expenditure as part of the biennial budgets, this memo is provided to ensure compliance with the delegation of authority to the Administrator and to ensure full transparency of major agency expenditures.

The request now includes funding for the additional Badger Book Developer position that the Commission directed staff to create at its May 14, 2024 meeting. This request also maintains existing capabilities approved by the Commission annually since 2018. Funding rates and IT classifications are established through the State of Wisconsin purchasing and procurement processes.

Agency IT application development positions are filled by IT contractors using the mandatory state contract process. IT contracted individuals in these positions are dedicated to agency IT applications and work full time under the agency's direct supervision. This is standard practice for most state agencies. These contractors have made significant contributions to agency IT applications, including development and maintenance of the WisVote system, MyVote, Badger Voters, Canvass Reporting, Badger Books, and other supporting applications.

Funding for contracted positions is secured through federal grants, program revenue, and general-purpose revenue. Contracted IT positions can be terminated by the agency at any point throughout the contract as needed, although at a minimum these positions will likely be necessary throughout FY25-27 in order to maintain and enhance agency IT applications.

Continued Appropriateness

Pursuant to the revised delegation of authority approved by the Commission at its meeting of February 27, 2020, the following purchasing request is submitted for the Commission's consideration and approval to ensure continuation of agency IT work for fiscal years 2026 and 2027.

Wisconsin Elections Commissioners

Ann S. Jacobs, chair | Marge Bostelmann | Don M. Millis | Carrie Riepl | Robert Spindell | Mark L. Thomsen

Administrator
Meagan Wolfe

FY26 and FY27 Approval for Contracted Information Technology (IT) Services

At the beginning of each budget cycle, Commission staff is required by the Department of Administration's (DOA) state IT contracting processes to authorize the continuation of IT work through a process called Continued Appropriateness (See [Pro-205, Wisconsin Procurement Manual](#)). This process is required for annual expenditures over \$50,000. WEC staff is requesting Commission approval to authorize the continuation of all seven IT contractors for FY26 and FY27, per the Commission's delegation of contract authority which requires pre-approval from the Commission for purchases over \$100,000.

All IT contractor rates are determined by the position classification established by the DOA rate card via the statewide contract. Purchase orders are written annually to start on July 1. The procurement authority for these services has been secured through DOA's competitively-bid enterprise contract (See [IT Vendor Managed Services and Solution contract, #505ENT-M21-SERVICESIT-01](#)).

The WEC's IT efforts are funded through federal funds, program revenue, and general-purpose revenue. Our biennial budget includes \$1,1750,000 annually for IT contract positions.

Contracted IT staff provide critical services to the agency that ensure all IT applications are maintained and functional. Contract IT staff also makes continuous enhancements and necessary modifications to support legislative changes, court directives, and platform upgrades. It is imperative to authorize the continuation of IT work in order to build and maintain major IT projects, such as MyVote Wisconsin, WisVote, Badger Books, Canvass Reporting System, Badger Voters, Canvass, and Access Elections.

Recommended Motion: Authorize the continuation of biennial IT contracts in FY 26 and FY27, at the previously approved allocation of up to \$1,1750,000 annually for IT contract positions.



Wisconsin Elections Commission

201 West Washington Avenue | Second Floor | P.O. Box 7984 | Madison, WI 53707-7984
(608) 266-8005 | elections@wi.gov | elections.wi.gov

DATE: Prepared for the April 17, 2025, Commission Meeting

TO: Members, Wisconsin Elections Commission

FROM: Angela O'Brien Sharpe Riley Willman
Staff Attorney Elections Supervisor

SUBJECT: Manual Revision Project 2025 – Project Overview

ATTACHMENT: Attachment A – Draft Combined Manual Outline

Introduction:

The Wisconsin Elections Commission (“the Commission”) is required by statute to create and publish manuals that can be “easily understood by the general public explaining the duties of the election officials.” Wis. Stat. 7.08(3). State law requires that the Commission periodically review and revise all manuals as necessary. Wis. Stat. § 7.08(3)(c). For years, the Commission and its predecessor agencies have produced several manuals on a variety of election topics. Current versions of the manuals are publicly available on the Commission’s website.¹

The two largest and most used manuals are the *Election Administration Manual* (“EA Manual”) and the *Election Day Manual* (“ED Manual”). These two manuals consist of hundreds of pages of Commission guidance on election law, policy, and procedure in Wisconsin, and are a primary resource for local clerks. These manuals are also an important resource for government officials, candidates, political parties, journalists, and members of the public to understand how elections are administered in Wisconsin.

In addition to the *EA Manual* and *ED Manual*, the Commission also maintains several other manuals covering more specific topics, including nomination paper challenges and candidate ballot access procedure; military and overseas voting; absentee voting in residential care facilities; caucus; recall; boards of canvassers; recount; canvass reporting; school districts; counting votes; wards, districts, reporting units, and annexations; and referenda. These manuals are often updated to reflect important changes in law, policy, or procedure, but many of these manuals have not undergone a line-by-line revision in several years.

Finally, the Commission also maintains four technical manuals for the operation of WisVote, MyVote, ElectEd, and Badger Books.

¹ Available at: <https://elections.wi.gov/clerks/manuals>.

Revision Project Overview

Commission staff regularly prepare proposed manual revisions in odd-numbered years, which do not have fall general elections. Most recent manual revisions have come as a result of 1) change in law or court orders; 2) tracked revisions of things that staff notice (or clerks or the public indicate) are incorrect, ambiguous, or in need of an update; or 3) Commission decisions or directives to update guidance.

The two primary objectives of the revision project, as explained further below, are to 1) conduct a line-by-line legal and procedure audit of all sixteen (16) substantive manuals maintained by the Commission; and 2) reorganize and combine all sixteen (16) of those manuals into one new, highly-organized resource titled *Election Law and Administration in Wisconsin*.

Project Objective 1 – Line-by-Line Audit of All Substantive Manuals

For the upcoming manual revision review period, Commission staff are proposing a more ambitious manual review project so that the versions in place for 2026 are completely updated. With almost eight months of project time ahead of us, Commission staff propose conducting a line-by-line audit of the Commission’s manuals from start to finish. The primary objectives of the line-by-line audit are:

- I. **Ensure that every word of the manual is reviewed for clarity, correctness, and completion.** Previous manual revisions have consisted of making known changes to information flagged as outdated, incorrect, or ambiguous. Commission staff have not undertaken a line-by-line legal and procedure review audit of many of the Commission’s manuals in several years. Additionally, the manuals will be reviewed and revised to use as much plain language as possible so that they are easily understandable by clerks and the public.
- II. **Distinguish between statutory requirements and best practices.** Currently, the manuals do not always distinguish between something that is required by law and something that the Commission considers a best practice. The revisions will add statutory cites to every sentence in the manual, and if the sentence contains guidance that is not statutorily required, it will be labeled instead as a Best Practice. This will help clerks find additional statutory language, and also will inform them of the Commission’s best guidance for when statute is silent on a particular aspect of election administration.
- III. **Reduce redundancy.** Information will be consolidated and reorganized to avoid duplication and redundancy throughout the manual.
- IV. **Expand information to be pertinent to more than just municipal clerks.** Current versions of the manuals are written directly for the use and benefit of municipal clerks. However, staff know that many other individuals rely on our manuals — including county clerks, government officials, candidates, political parties, and the public. Where appropriate, the content of the manuals will be expanded to include more information that is useful to users other than municipal clerks. The manual will still be of primary use to municipal clerks, but adding additional information will ensure that all users have a better understanding of the many aspects of election administration in Wisconsin.

Project Objective 2 – Reorganization and Combination of Content into One Manual

Over the years, all of the manuals maintained by the Commission have grown in scope, which also means that information is duplicative across various manuals. Maintaining several manuals also means that sometimes inconsistencies arise when one manual is updated but the same information is not updated in another manual. This in turn has created additional work for manual revisions, as the same sections often need to be updated in multiple manuals. Additionally, some users may not be aware that more specific subject matter manuals exist,

and if the information is not contained in the more commonly used *EA Manual* or *ED Manual*, they might conclude the Commission has either no or limited guidance on that topic.

Accordingly, staff recommend creating a new, consolidated manual titled *Election Law and Administration in Wisconsin*. This new manual would combine all pertinent information from the 16 manuals the Commission maintains into one highly-organized resource. The new, combined manual will continue to be the primary resource for Wisconsin clerks and the public on election administration.

The goal for *Election Law and Procedure in Wisconsin* is to provide clerks and the public with an elections encyclopedia they can turn to depending on what specific situation they need. For example, all content relating to Election Day procedures will be organized concurrently so that clerks can print out or separate that section for use at their polling locations on Election Day. Likewise, all information relating to military and overseas voters will likewise be grouped together so that clerks need not worry whether nuggets of information are spread out over the course of several sections.

The only manuals that would continue to be separate resources are the technical manuals specific to WisVote, MyVote, ElectEd, and Badger Books. These manuals will continue to be available to county and municipal clerks through the WEC's online training platform ElectEd.

A shell of the combined manual is included as **Attachment A**, which includes a table of contents of how the new, combined manual will be organized. The "New" indicator means that the section will be new to all manuals. The "Combined" indicator shows where existing manuals will be added into the general structure. The "Notes" line provides a brief summary of the information that will be contained in each section.

Commission staff have also solicited feedback from clerks ahead of undertaking this project to combine the manuals into one resource. Collecting this feedback is important to understand how clerks currently use the manuals, and whether combining them into one resource would be net helpful or net harmful to their administration practices. Commission staff will provide a summary of the feedback for the Commission at the April 17 meeting.

Next Steps

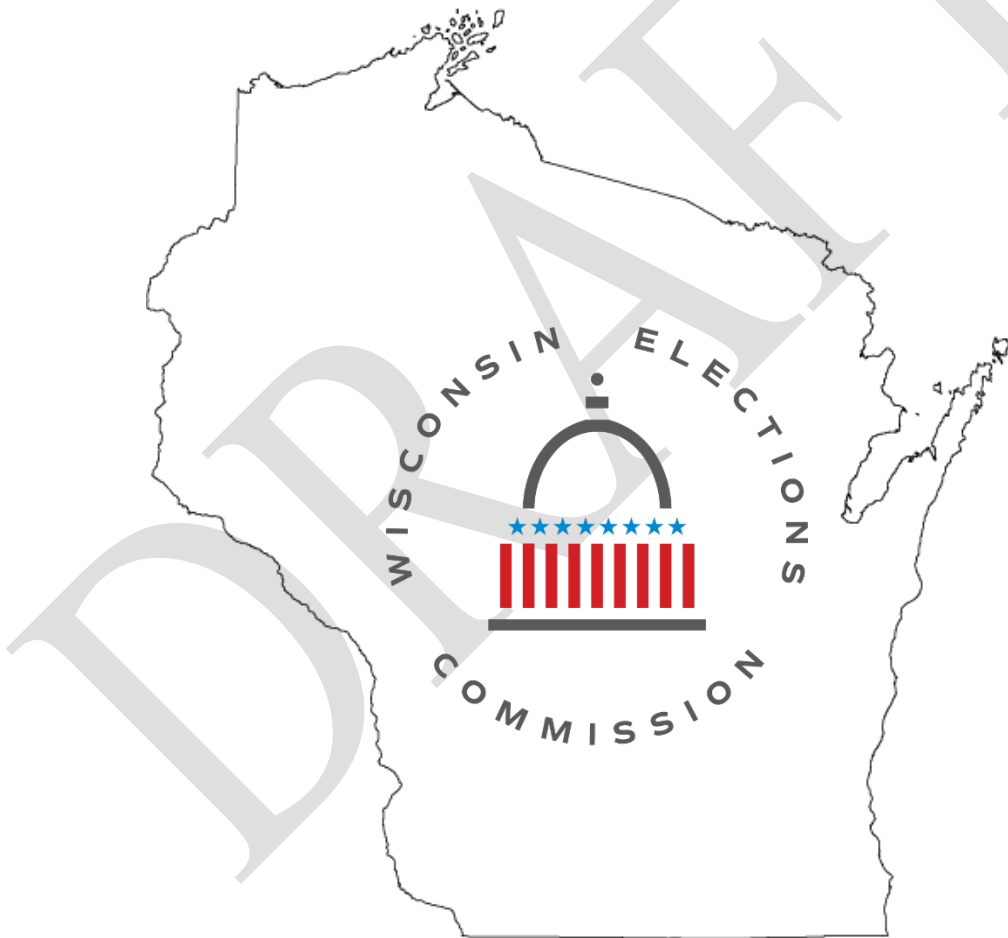
If the Commission approves of the revision project approach, staff will prepare the first several chapters for the Commission's review at an upcoming meeting. Staff will prepare the revisions by topic, and will track and explain each proposed change, similar to how manual revisions have been conducted in the past. The Commission will then have the opportunity to review each change and provide additional feedback or guidance. Staff will not release or publish a final version of *Election Law and Administration* until all sections have been reviewed and approved by the Commission.

The goal is to complete the review of *Election Law and Administration in Wisconsin* by the end of 2025 so that clerks have time to become familiar with the new resource ahead of the elections in 2026. This is an ambitious project, but it is one that Commission staff believe is overdue.

Recommended Motion: The Wisconsin Elections Commission ("the Commission") directs staff to proceed with the plan to revise the manuals pursuant to Wis. Stat. § 7.08(3)(c) as outlined in this memo and subject to the discussion during this meeting. Staff are directed to bring revised chapters for the Commission's review and approval at an upcoming meeting.

Election Law and Administration in Wisconsin

Manual for Statutory Requirements & Best Practices



Wisconsin Elections Commission

Message from the Wisconsin Elections Commission

The Wisconsin Elections Commission (“the Commission”) is required by statute to create and publish manuals that can be “easily understood by the general public explaining the duties of the election officials.” Wis. Stat. § 7.08(3). State law requires that the Commission periodically review and revise all manuals as necessary. Wis. Stat. § 7.08(3)(c).

[This section will summarize the review project and process]

How to Use this Manual in Office and on Election Day

Election Law and Administration in Wisconsin is intended to be a complete, primary resource for the proper administration of elections in Wisconsin. The Commission encourages use of the electronic version of this manual, which can be downloaded as a PDF for free from the Commission's website. Using an electronic version means users can take advantage of the "Control + F" function to search for each instance of a word or term throughout the entirety of the manual. For example, holding "Control" and "F" at the same time will allow a user to search for everything in the manual relating to "confidential voter" or "proof of residence" or "absentee ballot."

The Commission also understands that election inspectors, clerks, and observers appreciate access to a resource specific to election day, particularly when they are at a polling place. This manual is designed to make that possible. To create an election-day-specific version of this manual, just print or save **pages XXX – XXX**. All information relating to election day is contained in those pages.

TABLE OF CONTENTS

- I. GENERAL INFORMATION & INTRODUCTION**
 - a. Introduction**
 - b. Election Law – Statutes & Administrative Code – NEW**
 - i. Notes: General overview of topics covered by statute and admin code*
 - c. Making Your Election Plan – NEW**
 - i. Election Calendar Website Location*
 - ii. Notes: Best practices for developing an election plan based on deadlines and responsibilities; particularly useful for new clerks*
- II. CANDIDATES**
 - a. Qualifications for Office**
 - i. Notes: Qualifications for federal, state, and local offices*
 - b. Ballot Access Procedure**
 - i. Notes: Filing officer responsibilities; ballot access checklists; required ballot access documents; nomination paper requirements and review procedure; correcting affidavits; required signatures per office*
 - ii. Candidate Ballot Access Procedure Manual – COMBINED**
 - 1. Notes: Existing manual will be integrated; tips for successful circulation; frequently asked questions; much is duplicative*
 - c. Nomination Paper Challenges**
 - i. Notes: Challenge review, procedure, deadlines, appeal of local filing officer decisions*
 - ii. Common Nomination Paper Challenges – COMBINED**
 - 1. Notes: Existing manual will be integrated; common challenge examples and how they were resolved by Commission*
 - d. Procedures for Nomination of Candidates by Caucus Manual – COMBINED**
 - i. Notes: Existing manual will be integrated; who can nominate; when caucus held; caucus notice; caucus presider; nomination procedure; ties; required paperwork; ballot order, reconvening; FAQs*
 - e. Write-In Candidates**
 - i. Notes: Procedures and required paperwork*
 - f. Notification of Noncandidacy**
 - i. Notes: Procedures; deadlines; required paperwork*
 - g. Filing Officers & Recordkeeping**
 - i. Notes: Specific to nomination documents*
 - h. Frequently Asked Questions**
 - i. Notes: Self-explanatory*
- III. VOTER LIST MAINTENANCE – NEW**
 - a. How to Get Support – NEW**
 - i. Notes: Resources for help with clerk-required list maintenance, including county clerk and Commission staff*
 - b. Relier Jurisdictions – NEW**
 - i. Notes: Relier jurisdictions use their county clerks for data entry, but some relier clerks have asked for material specific to them; better*

communication with county clerks & why county clerks need reliable information for WisVote tasks

- c. **Available WisVote Reports and How to Use Them – NEW**
 - i. **Notes:** *Summary of WisVote reports and how they can be used for election admin tasks; not intended to be a user guide for how to access specific reports*
- d. **Registration List Alerts – NEW**
 - i. **Notes:** *Accessing alerts; types of alerts (deaths, duplicates, felons, rights restored); how to handle each one; deadlines*
- e. **Adjudications of Incompetency – NEW**
 - i. **Notes:** *Overview of process; how to compare AI notifications with existing voter records; tips for working with Register in Probate*
- f. **Four-Year Maintenance Procedures – NEW**
 - i. **Notes:** *Required clerk action; procedures; deadlines*
- g. **Frequently Asked Questions – NEW**
 - i. **Notes:** *Self-explanatory*

IV. ELECTION NOTICES

- a. **Type A – Notice of Election**
- b. **Type B – Notice of Sample Ballot & Voting Instructions**
- c. **Type C – Notice of Referendum**
- d. **Type D – Notice of Hours & Locations of Polling Places**
- e. **Type E – Notice of Absentee Voting**
- f. **Notes:** *Requirements for each notice; who drafts and for which elections; layout and format; publishing details*
- g. **Summary of Publishing Dates**
- h. **Procedures for Publishing and Posting**
- i. **Frequently Asked Questions**

V. BALLOTS

- a. **Procedures**
 - i. **Notes:** *Determining how many ballots needed; ballot order of candidates; county clerk role; printing and proofing of ballots; delivery*
- b. **Ballot Format**
 - i. **Notes:** *Size; columns; type face; justification; date, paper weight; color; boxes, ovals, and arrows; optical scan ballots; ballot endorsement; appearance of candidates' names*
- c. **Federal Write-In Ballots for Military & Overseas Electors**
 - i. **Notes:** *Procedures and required documents;*
- d. **Referendum Ballots**
 - i. **Notes:** *Procedures for paper ballots; procedures for optical scan ballots*
- e. **A / B Ballots – NEW**
 - i. **Notes:** *When to use them, how to use them, special considerations*
- f. **Presidential Only Ballots**
 - i. **Notes:** *When to use them, how to use them, special considerations*
- g. **Sample Ballots**
 - i. **Notes:** *Posting at the polling place, color restrictions, watermark*
- h. **Frequently Asked Questions**

- i. *Notes: Self-explanatory*
- VI. ELECTORS**
 - a. Voter Qualifications**
 - i. *Notes: Who can register to vote; residency; disqualification of electors*
 - b. Voter Registration Prior to Election Day**
 - i. Methods of Registration**
 - 1. *Notes: By mail; in clerk's office; during IPAV; online; election day registration will be in the election day section of manual*
 - ii. Completing the Voter Registration Application**
 - 1. *Notes: Required components on form; official use only section; diagramming address; accommodation requests*
 - iii. Proof of Residence**
 - 1. *Notes: Acceptable documents; POR exemptions*
 - iv. Electronic Proof of Residence**
 - 1. *Notes: Standard of review; Internet access; handling electronic devices*
 - v. Registration Record Keeping & Retention**
 - 1. *Notes: Retention requirements for voter registration records*
 - vi. Frequently Asked Questions - UPDATED**
 - 1. *Notes: Self-explanatory*
 - c. Confidential Electors**
 - i. *Notes: Application; required information; procedures for registering; procedures for voting*
 - ii. Frequently Asked Questions - UPDATED**
 - 1. *Notes: Self-explanatory*
 - d. Absentee Voting**
 - i. Absentee Voting Deadlines**
 - 1. *Notes: For sending out ballots, for returning ballots, for processing requests*
 - ii. Types of Absentee Voters**
 - 1. Introduction**
 - a. *Notes: Overview of types of absentee voter; a voter can only be 1 type at a time even if they qualify for multiple*
 - 2. Typical Absentee Electors**
 - a. *Notes: Definition of absent elector*
 - 3. Calendar Year Requests**
 - a. *Notes: Qualifications; processing; deadlines*
 - 4. Indefinitely Confined Electors**
 - a. *Notes: Definitions and qualifications; when status is lost; specifics for absentee voting*
 - 5. Military and Overseas (UOCAVA) Electors**
 - a. Military, Permanent Overseas, Temporary Overseas
 - b. **UOCAVA Manual – COMBINED**
 - c. *Notes: Definitions and qualifications; processing; deadlines; when status is lost; electronic ballots*
 - d. Federal Write-in Absentee Ballot (FWAB)

- 6. **Hospitalized Electors**
 - a. *Notes: Qualifications; procedures, deadlines*
- 7. **Sequestered Juror Electors**
 - a. *Notes: Qualifications; procedures; deadlines*
- 8. **Occupants of Residential Care Facilities & Retirement Homes**
 - a. **SVD Voting Manual – COMBINED**
 - b. *Notes: SVD qualifications and appointment; voting procedure; deadlines; what to do when the facility is closed*
- iii. **Absentee Ballot Requests & Processing**
 - 1. **Method of Request**
 - a. *Notes: By mail, online, by email, in person, by agent, by fax, by SVD; deadlines for requests; required information for each type of request*
 - 2. **Receiving and Processing the Request**
 - a. *Notes: Handling; review of ineligible voter list; what goes in the absentee carrier envelope; how to use the absentee ballot log*
 - 3. **Sending or Transmitting the Absentee Ballot**
 - a. *Notes: Deadlines; methods for different voters*
- iv. **Proof of Identification**
 - 1. *Notes: Acceptable types of ID; exemptions*
- v. **In-Person Absentee Voting (IPAV)**
 - 1. *Notes: Deadlines; notice; procedure; chain of custody; witness requirements*
- vi. **Alternate Absentee Voting Sites**
 - 1. *Notes: How sites selected; uses*
- vii. **Cancelling and Issuing Replacement Absentee Ballots – NEW**
 - 1. *Notes: For use when an absentee ballot is lost, is taking too long to arrive, or otherwise has not been received by the municipal clerk*
- viii. **Absentee Ballot Return**
 - 1. **Who can return an absentee ballot?**
 - a. *Notes: Caselaw updates*
 - 2. **By Mail**
 - a. *Notes: Procedure; deadlines; best practices for working with USPS*
 - 3. **Drop Boxes**
 - a. *Notes: Section/FAQ from 2024*
 - 4. **Polling Places**
 - a. *Notes: Notation but more detail in ED Section*
 - 5. **In-Person to Municipal Clerk**
 - a. *Notes: Notation but then cross-reference to IPAV section*
- ix. **Absentee Ballot Certificate Envelopes**
 - 1. *Notes: Types, examples*
- x. **Witness Address Requirements**

1. **Notes:** *Standard for witness address post-litigation; clerks cannot modify or add information to the envelope*
- xi. Correcting Defective Absentee Certificate Envelopes**
 1. **Notes:** *Section from 2024; returning the ballot to the voter; setting the ballot aside for rejection; defect in voter info section; defect in witness info section; issuing a new certificate envelope;*
- xii. Spoiling & Replacement of Absentee Ballots**
 1. **Notes:** *Section from 2024; when is a ballot returned; how the spoiling request is made*
- xiii. Processing, Sorting, and Storing Absentee Ballots – NEW**
 1. **Notes:** *Best practices; chain of custody; storing ballots; special considerations for training poll workers and chief inspectors*
- xiv. Transfer of Absentee Ballots to the Polling Places – NEW**
 1. **Notes:** *Small section from 2024 but expanded*
- e. Provisional Voting**
 - i. **Notes:** *When used; deadlines; procedure; processing*
- f. Absentee Frequently Asked Questions**
 - i. **Notes:** *Self-explanatory*
- VII. ELECTION OFFICIALS**
 - a. County Clerks – NEW**
 - i. **Notes:** *Qualifications; election responsibilities*
 - b. Municipal Clerks**
 - i. **Notes:** *Appointment and qualifications; training requirements; election responsibilities*
 - c. Chief Election Inspectors**
 - i. **Notes:** *Appointment and qualifications; training requirements; election responsibilities*
 - d. Election Inspectors**
 - i. General Qualifications**
 1. **Notes:** *Statutory requirements; assessing whether additional requirements are warranted; interplay with status as employees & HR requirements*
 - ii. Appointment, Term, & Removal**
 1. **Notes:** *Partisan appointments; incomplete lists; no lists received; unaffiliated poll workers; appointment by governing body; terms of office; filling vacancies; removing a poll worker*
 - iii. Number of Required Election Inspectors**
 1. **Notes:** *Minimum; increasing or decreasing the numbers*
 - iv. Training Requirements**
 1. **Notes:** *Minimum required training for poll workers*
 - v. Types of Election Inspectors**
 1. **Notes:** *Tabulators; Greeters; High School Student Election Inspectors*
 - vi. Frequently Asked Questions - UPDATED**
 1. **Notes:** *Self-explanatory*
 - e. Election Registration Officials (EROs)**

- i. *Notes: Appointment and qualifications; duties; training requirements*
- f. **Special Voting Deputies (SVDs)**
 - i. *Notes: Qualifications; selection and appointment; training*
- g. **Oaths of Office**
 - i. *Notes: Who is required to take an oath; oath requirements*
- h. **Frequently Asked Questions (FAQs)**
 - i. *Notes: Self-explanatory*

VIII. VOTING EQUIPMENT

- a. **Types of Voting Equipment Authorized in Wisconsin**
 - i. *Notes: Hand count versus electronic voting systems; when EVS required*
 - ii. **Tabulation & Hand Count Option – NEW**
 - 1. *Notes: Expanded information and considerations for jurisdictions who qualify for hand count and are exploring that option*
- b. **Certification and Approval**
 - i. *Notes: Federal certification; state approval; approved vendors*
- c. **Testing and Review of Voting Equipment for Certification – NEW**
 - i. *Notes: Expanded section detailing the steps Commission staff take to test and review voting equipment as part of the certification process*
- d. **Pre-Election Equipment Testing**
 - i. *Notes: Public notice, procedure; testing protocol; election day zero-count requirement*
- e. **Security Procedures for Electronic Voting Systems**
 - i. *Notes: General electronic voting system security procedures; ballot security; secure storage of voting equipment; alternative security procedures*
- f. **Post-Election Audit**
 - i. *Notes: Selection; notification; procedure*
- g. **Frequently Asked Questions**
 - i. *Notes: Self-explanatory*

IX. BADGER BOOKS (ELECTRONIC POLL BOOK) – NEW

- a. See “Badger Books Manual” – But this manual will NOT be combined here
- b. **Becoming a Badger Book Jurisdiction – NEW**
 - i. *Notes: Qualifications; memorandum of understanding; hardware purchase*

X. ACCESSIBILITY

- a. **Planning for Accessible Polling Places**
 - i. *Notes: Polling Place Accessibility Self-Assessment; best practices to increase accessibility*
- b. **Accessible Voting Equipment**
 - i. *Notes: Types certified for use; requirement of use*
- c. **Training Election Inspectors on Accessibility**
 - i. *Notes: Reviewing polling place details; accommodations to voters; how to use accessible voting equipment; links to or titles of ElectED trainings*
- d. **Accessibility Contacts & Additional Resources**
 - i. *Notes: Disability Vote Coalition; Disability Rights Wisconsin; Election Day Accessibility Checklist*

- e. **Common Sense & Common Courtesy Points**
 - i. *Notes: Self-explanatory*
 - f. **Frequently Asked Questions - UPDATED**
 - i. *Notes: Self-explanatory*
- XI. **EMERGENCY PREPAREDNESS**
 - a. **Procedures**
 - i. *Notes: Preparing your Election Day Emergency Response Plan; training on use of the ERP; establishing normal operating procedures; troubleshooting common emergency scenarios; planning for alternate polling locations*
 - b. **Frequently Asked Questions**
 - i. *Notes: Self-explanatory*
- XII. **POLLING PLACES AND SUPPLIES**
 - a. **Establishing Polling Places**
 - i. *Notes: How selected; who selects; considerations; ability to close polling places; combined polling places for multiple wards*
 - ii. **School District Polling Place Closures (From ED Manual)**
 - 1. *Notes: Special circumstances where a school district can close a polling place to consolidate if there are no other elections*
 - b. **Equipping and Supplying the Polling Place**
 - i. *Notes: Voting booths; electronic voting systems; paper ballots; ballot boxes; flag; election law and manuals; tables and chairs; signs; observer area materials; voter information and notices; organizing election day supplies; poll list*
 - c. **Frequently Asked Questions**
 - i. *Notes: Self-explanatory*
 - d. **Polling Place Checklist**
 - i. *Notes: Self-explanatory*
- XIII. **ELECTION DAY** **Pages XXX-XXX Can be Separated to Use on Election Day**
 - a. **Election Day Contacts**
 - i. *Notes: WEC staff; county clerk; law enforcement; DMV; DOC*
 - b. **Role of the Commission on Election Day – NEW**
 - i. *Notes: What WEC staff can help with; resources; how to get in touch; after hours coverage*
 - c. **Role of the County Clerk on Election Day – NEW**
 - i. *Notes: What county clerk can help with; resources*
 - d. **Role of the Municipal Clerk on Election Day (EA manual)**
 - i. *Notes: Turnout data communication; ballot supply; managing poll worker staffing; troubleshooting issues; media inquiries; appointing a deputy*
 - e. **Preparations**
 - i. **Preparing to Serve**
 - 1. *Notes: Qualifications of election officials; training requirements; how to prepare*
 - ii. **Polling Place Set-Up**

1. **Notes:** *Layout; where things go; troubleshooting space issues; observer area; accessibility; voting equipment; using the polling place checklist*
- iii. **Frequently Asked Questions**
 1. **Notes:** *Self-Explanatory*
- iv. **Polling Place Checklist**
 1. **Notes:** *Self-Explanatory*
- f. **Opening the Polls**
 - i. **Notes:** *7 a.m. requirement; documenting late starts; required announcement*
- g. **Election Observers**
 - i. **Notes:** *Will include provisions from approved final text of observer rule as best practice*
 - ii. **Notes:** *Conduct of election officials; conduct of observers; location specific requirements (polling places); post-observation practices; communications media; observer log; distance from voting activity; viewing documents; repeating names and addresses;*
 - iii. **Frequently Asked Questions - UPDATED**
 1. **Notes:** *Self-explanatory*
- h. **Badger Books – NEW**
 - i. **Notes:** *Not a technical section; will include set up and procedures specific to Badger Books at the polling place*
- i. **Election Day Registration**
 - i. **Voter Qualifications**
 1. **Notes:** *Residency; disqualification of electors*
 - ii. **Voter Registration Application**
 1. **Notes:** *Required information on front and back of form*
 - iii. **Proof of Residence**
 1. **Notes:** *Acceptable documents; electronic proof of residence*
 - iv. **Ineligible Voter List**
 1. **Notes:** *Felon list; adjudicated incompetent list (confidential)*
- j. **Challenging Voter Registration or Qualifications**
 - i. **By Inspector**
 1. **Notes:** *Only an election inspector can challenge a voter for not properly following voter procedure*
 - ii. **By Qualified Elector of State**
 1. **Notes:** *Types of challenges; challenges not permitted; challenge procedure; documentation*
- k. **Recording Voters**
 - i. **Notes:** *Poll lists; supplemental poll list; absentee log; poll list notations;*
- l. **Confidential Voters at the Polling Place**
 - i. **Registering to Vote**
 1. **Notes:** *Instructions to direct them to clerk's office*
 - ii. **Voting Procedure**

1. *Notes:* Confidential section of poll book; exempt from stating name and address but still must sign the poll book; special identification/voting cards;
- m. Issuing Ballots and Voting**
 - i. *Notes:* Procedure; proof of identification; signing the poll book; assigning a voter number; directing the voter to the booths; voter spoiling of ballots
- n. Assisting Electors**
 - i. *Notes:* Procedure for voting for voters who need assistance; signing poll book; marking ballot
- o. Curbside Voting**
 - i. *Notes:* Statutory requirements; procedure; notifying observers; exempt from poll list signing; initialing the ballot; tabulating the ballot
- p. Provisional Voting**
 - i. *Notes:* Limited use; procedure and special certificate; issuing provisional voter number; returning the provisional ballot to the poll workers; proper documentation; Provisional Voting Information Sheet; return of elector prior to 8:00 p.m.; spoiling or casting provisional ballot
- q. Common Election Day Issues - EXPANDED**
 - i. **Voter Cell Phones and Photography in Polling Area**
 1. *Notes:* Pictures of ballots; “selfies”; live streaming
 - ii. **Political Attire in the Polling Place**
 1. *Notes:* Campaign/electioneering prohibited; avoid disruptions to polling place
 - iii. **Media**
 1. *Notes:* Photography/filming inside polling place; exit interviews; interviews with poll workers or staff
 - iv. **Electioneering**
 1. *Notes:* 100 foot perimeter; circulating petitions; multi-use polling places; vehicles; election materials; solicitors
 - v. **Food, Fundraisers, Events at or Near Polling Places**
 1. *Notes:* Implication with election bribery laws; should be fairly offered to both voters and non-voters
 - vi. **Mass Challenges, Persistent Questions, Protests, and other Disruptive Behavior**
 1. *Notes:* Strategies; warnings; expelling disruptors
 - vii. **Frequently Asked Questions**
 1. *Notes:* Self-Explanatory
- r. Processing Absentee Ballots**
 - i. **Absentee Ballots – General**
 1. *Notes:* Overview; pertinent statutes; where to open and count absentee ballots; types of absentee ballots (regular, ExpressVote, UOCAVA); certificate envelopes
 - ii. **Recommended Polling Place Procedure – NEW**
 1. *Notes:* Set up and designate an absentee ballot table or zone; documents and resources to have on hand; process absentee ballots all day even when busy

- iii. **Absentee Courier Deliveries to Polling Places**
 - 1. **Notes:** *Accounting for sealed carrier envelopes and courier bags*
- iv. **Absentee Certificate Envelope Requirements**
 - 1. **Notes:** *Examining the certificate envelope for sufficiency; voter correction of insufficiencies; checking for included proof of identification (if required);*
- v. **Ineligible Voter List**
 - 1. **Notes:** *Confirming whether absentee voter is ineligible*
- vi. **Rejecting Absentee Ballots**
 - 1. **Notes:** *Grounds; procedure; documentation; marking the ballot*
- vii. **Processing Absentee Ballots**
 - 1. **Notes:** *Opening certificate envelope; handling two or more ballots inside; check ballot for initials; check for cross-over votes; check for stickers; check for unusual marks or heavy creases; checking in absentee voters to poll book; recording voter number*
- viii. **Absentee Voters at the Polling Place – NEW**
 - 1. **Notes:** *Voters returning absentee ballots to polling place; voters wanting to spoil a blank absentee ballot to vote in person; voters who have been issued an absentee ballot; voters who have returned an absentee ballot*
- ix. **Challenging Absent Electors**
 - 1. **Notes:** *Grounds, procedure, documentation*
- x. **Challenging Absentee Voting Procedure – Election Inspectors – NEW**
 - 1. **Notes:** *Grounds, procedure, documentation*
- s. **Central Count Absentee Ballot Site (EA Manual)**
 - i. **Notes:** *Becoming a central count jurisdiction; suggested procedures; observers*
- t. **Overvoted and Crossover Ballots**
 - i. **Notes:** *Allowing override function; remaking ballots with overvotes; remaking ballots with crossover votes; ballot remaking procedure; involving observers; documentation and notations;*
- u. **Counting Ballots & Determining Voter Intent**
 - i. **Counting Votes Manual – COMBINED**
 - ii. **Counting Votes**
 - 1. **Notes:** *Hand-counted paper ballots; optical scan ballots; direct recording electronic voting equipment*
 - iii. **Determining Voter Intent**
 - 1. **Notes:** *Standard; acceptable use*
- v. **Write-In Vote Scenarios**
 - i. **Notes:** *Counting write-in votes; special considerations for partisan primary elections; special considerations for the general election*
- w. **Polling Place Accessibility Reviews**
 - i. **Notes:** *Purpose; identifying and working with reviewers; cameras and video permitted*
- x. **Closing the Polls**
 - i. **Notes:** *End of line officer; polling place remains open to public;*

- ii. **Emergency petitions to extend voting**
 - 1. **Notes:** *Marking ballots correctly*
 - iii. **Reconciling Poll List**
 - 1. **Notes:** Procedure; comparing voter numbers;
 - iv. **Absentee Voting Statistics – NEW**
 - 1. **Notes:** *Obtaining absentee turnout total from municipal clerk; comparing absentee ballots returned with absentee voter numbers assigned*
 - v. **Completing Forms**
 - 1. **Notes:** *Inspectors’ Statement; Absentee Ballot Log; Observer Log; Tally Sheets;*
 - vi. **Organizing Election Materials**
 - 1. **Notes:** Rejected ballots; voted ballots; sealing ballot bags
 - vii. **Routing Materials**
 - 1. **Notes:** *What goes to the municipal clerk; what goes to the school district clerk; what goes to the county clerk;*
 - viii. **Frequently Asked Questions - UPDATED**
 - 1. Self-explanatory
 - ix. **Post-Election Checklist**
 - 1. Self-Explanatory
 - y. **Local Board of Canvassers**
 - i. **Notes:** *Meeting; preparing for election night LBOC*
 - z. **Municipal Board of Canvassers**
 - i. Breaking a Tie in a Municipal Contest
 - ii. **Notes:** *Meeting; preparing for election night MBOC*
 - aa. **Transmitting and Posting Unofficial Election Results – NEW**
 - i. **Note:** *Methods for transmitting unofficial results*
 - bb. **Election Night Duties of Municipal Clerks (From EA Manual)**
 - i. **Notes:** *Posting provisional ballot numbers; reporting double voting to law enforcement*
 - cc. **Sample Forms**
 - i. [Updated List & Links from Website]
- XIV. **POST-ELECTION ACTIVITIES**
 - a. **Processing and Handling Provisional Ballots (From ED Manual / EA Manual)**
 - i. **Notes:** *Deadline; processing; updating WisVote; Provisional Ballot Reporting Form; securing and documenting*
 - b. **Preparation for the Municipal Board of Canvassers Meeting – NEW**
 - i. **MBOC Suggested Procedures – COMBINED**
 - ii. **Notes:** *Reviewing inspectors’ statements and absentee logs; preparing documents and data; presenting issues; review all election materials for any unprocessed ballots; tabular statement; summary statement; certification*
 - c. **Preparation for the County Board of Canvassers Meeting – NEW**
 - i. **CBOC Suggested Procedures – COMBINED**

- ii. **Notes:** *Reviewing inspectors' statements and absentee logs; preparing documents and data;*
 - d. **Preparation for the Commission Certification of the Election – NEW**
 - i. **Notes:** *Reviewing inspectors' statements and absentee logs; preparing documents and data;*
 - e. **Canvass Reporting System Manual – COMBINED**
 - f. **Reconciliation & Entry of Voter Participation Data – NEW**
 - i. **Notes:** *Deadlines; best practices to enter early; documenting mismatches in data; reporting incidents to canvassers and Commission*
 - g. **Absentee Ballot List Maintenance**
 - i. **Notes:** *Failure to return calendar year absentee ballot; failure to return indefinitely confined ballot; loss of eligibility for military and overseas absentee ballots*
 - h. **Election Day Registration Postcards & Handling – NEW**
 - i. **Notes:** *Investigating returned post cards; integrating existing guidance*
 - i. **Issuing Certificates of Election for Municipal Contests**
 - i. **Notes:** *Deadlines; Recount implications;*
 - j. **Issuing Certificates of Election for County Contests – NEW**
 - i. **Notes:** *Deadlines; Recount implications;*
 - k. **Issuing Certificates for State and Federal Contests – NEW**
 - i. **Notes:** *Deadlines; Recount implications;*
 - l. **Frequently Asked Questions**
 - i. Self Explanatory
 - m. **Supplies Checklist**
 - i. Self-Explanatory
 - n. **Election Materials for Each Reporting Unit Checklist**
 - i. Self-Explanatory
- XV. RECOUNTS**
- a. **Recount Manual – COMBINED**
 - b. **Notes:** *Determining recount margins; petition requirements; deadlines; fees; ordering a recount; conducting the recount; tabulating method; appeals*
- XVI. RECALL ELECTIONS**
- a. **Recount Manuals – COMBINED**
 - b. **Notes:** *Procedures; registering the recall committee; petition signatures; circulation time period; candidate eligibility; recall primaries; scheduling and running the recall election*
- XVII. REFERENDA ELECTIONS**
- a. **Referenda Manual – COMBINED**
 - b. **Notes:** *Referenda; ballot questions; direct legislation (voter initiatives); getting it on the ballot; binding versus advisory; timing; notice and procedural requirements; wording of the question; explanatory statements; WEC involvement*
 - c. **Frequently Asked Questions – UPDATED**
- XVIII. SCHOOL DISTRICT CLERK MANUAL**
- a. **School District Manual – COMBINED**
 - b. **Notes:** *Notices; candidates; ballots; post election activities; recounts; recall elections; other election materials*

- XIX. WARDS, DISTRICTS, REPORTING UNITS, ANNEXATIONS**
- a. **Wards, Districts, Reporting Units, Annexations Manual – COMBINED**
 - b. **Notes:** Wards and districts; reporting units; annexation; when annexation necessitates the creation of a new ward; determining where annexed electors vote; transferring voters; annexation and polling places; notifying governmental units and other entities of annexation
 - c. **Frequently Asked Questions – UPDATED**
- XX. OTHER ELECTION MATERIALS**
- a. **Cost of Elections**
 - i. **Notes:** *Breakdown of who is responsible and who pays for certain election-related costs*
 - b. **Public Records Requests for Election Materials – NEW**
 - i. **Notes:** *Common requests; releasable records; records that should be redacted or withheld*
 - c. **Destruction of Election Materials**
 - i. **Notes:** *Self-explanatory chart*
 - d. **Electronic Conversion of Election Records**
 - i. **Notes:** *19.21(4)(c) conversion procedures*
- XXI. SAMPLE FORMS (NON-ELECTION DAY) – UPDATED**
- XXII. GLOSSARY – UPDATED**



Wisconsin Elections Commission

201 West Washington Avenue | Second Floor | P.O. Box 7984 | Madison, WI 53707-7984
(608) 266-8005 | elections@wi.gov | elections.wi.gov

DATE: Prepared for the April 17th, 2025, Commission Meeting

TO: Members, Wisconsin Elections Commission

FROM: Brandon Hunzicker
Staff Attorney

SUBJECT: UOCAVA Absentee Ballot Request Maintenance

Introduction:

Some individuals who may be indefinitely confined for voting purposes also serve in the military or live overseas. Legally, an individual may meet the qualifications as both an indefinitely confined voter and a military or overseas elector, and this memo does not discuss that aspect of these individuals. Instead, this memo focuses on the question of whether municipal clerks can comply with the absentee ballot list maintenance processes specific to each governing statute. Staff believe that there is not an adequate way to reconcile each maintenance process within one absentee ballot request, and individuals who have selected both statuses — again, this memo does not question these voters' qualifications or imply that they are doing anything wrong — currently receive a mixed maintenance process that does not fully comply with either status.

Setting aside several nuances, military and overseas voter absentee ballot requests allow voters to receive ballots by email and the requests last for one calendar year. Indefinitely confined requests last until the voter fails to return an absentee ballot to a clerk, but do not allow receipt of a ballot by email. The issue, put simply, is that someone who qualifies for both absentee voting methods and selects both on their absentee application ends up receiving absentee ballots by email indefinitely as long as they keep returning ballots for elections other than primaries. Staff seek in this meeting to present the statutory issues caused by these requests, along with potential options for resolving them.

As the Discussion section of this memo explains, staff believe that the current process and policies allow voters the option to request an absentee ballot under two different statutory methods. Staff are proposing that the Commission consider changing this guidance so that absentee voters can choose only one legal method to request an absentee ballot, even if they qualify for more than one.

Discussion:

Separate statutes govern absentee ballot requests for military, overseas, and indefinitely confined electors. For both military and overseas absentee ballot requests, “unless the individual otherwise requests,” a clerk must send the appropriate ballot to the elector for all remaining elections within the calendar year. *See Wis. Stats. §§*

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6.22(4)(a) and 6.24(4)(c). Because permanent overseas electors only receive ballots with federal races, this would generally only entail receiving two ballots every other year, one for the Partisan Primary and one for the General Election, with additional ballots for the Presidential Preference Primary and any Special Elections. These ballots can be sent by email. *See* Wis. Stats. §§ 6.22(2)(e) and 6.24(4)(e). The military voter and overseas voter statutes, which will be considered as a unit in this memo, provide that clerks must continue to send absentee ballots within the calendar year in which the first ballot was requested, regardless of whether the previous ballot was returned. *Id.*

In contrast, the indefinitely confined voter statute requires a clerk to continue sending absentee ballots beyond a calendar year but adds that the mailing must be discontinued if a voter fails to return a ballot for an election other than a primary (per the Commission’s November 2, 2023, interpretation) and fails to send a renewal notice to the voter’s municipal clerk. *See* Wis. Stat. § 6.86(2).

There are at least two reasons to believe that these processes should not be combined, even if a voter qualifies for both. First, there is an express provision limiting a voter to one option within a series of options separated by statutory use of the word “or.” Wis. Stat. § 6.86(1)(a)3. Second, even without this express provision limiting a voter to one process, the statutes govern different, though overlapping, situations and apply different procedures, which overwhelmingly implies a legislative intent that the procedures specified for each would be followed, and followed in full. No statutory text supports a combination of the procedures.

The express provision is Wis. Stat. § 6.86(1)(a)3., and it states that one may request absentee ballots:

By signing a statement and filing a request to receive absentee ballots under sub. (2) [indefinitely confined] **or** (2m) (a) [calendar year] **or** s. 6.22 (4) [military electors], 6.24 (4) [overseas electors], **or** 6.25 (1) (c) [federal write-in absentee ballot requests]. Wis. Stat. § 6.86(1)(a)3. (Emphasis added).

The interpretation that § 6.86(1)(a)3. only allows using one process at a time is supported by the calendar year statute and the federal write-in absentee ballot statute, both of which prohibit absentee electors in those categories from submitting an absentee request in a second, different category. The calendar year statute expressly prohibits voters who receive an absentee ballot as indefinitely confined, military, or overseas electors from submitting a calendar year application. Wis. Stat. § 6.86(2m)(a). Additionally, federal write-in absentee ballot voters by definition are either military or overseas voters, and the statute would also prohibit a military or overseas voter who has already sent a write-in request from voting a second regular ballot under a different process at an election.

The indefinitely confined statute does not contain an express exclusion as described above for the calendar year process, but the “or” list above is sufficient to demonstrate that a voter should only select one process within that list.

Even without the express prohibition, an examination of the statutory processes shows that they were not meant to be combined and should be followed independently. When a voter completes both the military or overseas portions of an absentee ballot request form and also checks the box that they are indefinitely confined, it is not possible to carry out both absentee ballot list maintenance procedures in full. It would be incorrect to remove a military or overseas voter from the mailing list for absentee ballots due to the failure to return a ballot, and it would be incorrect to stop sending absentee ballots at the end of the calendar year if an indefinitely confined voter returned the last ballot sent. In the same way, it would be incorrect to send a military voter or overseas voter a

ballot in a calendar year beyond the calendar year in which they made the request, and it would be incorrect to send an indefinitely confined elector a new ballot — particularly by email — if they have failed to return the last ballot for an election other than a primary.

Currently, the Military & Overseas Voting manual¹ on page 17 instructs municipal clerks that:

As with regular indefinitely confined voters, if a military or overseas indefinitely confined voter does not return a spring or general election ballot, the clerk should send the “30-day letter” notifying them of the potential cancellation of their indefinitely confined status, Wis. Stat. §6.86(2)(b). If they do not respond to the mailing, their absentee request should be inactivated, and they have to reapply if they want to receive ballots for future elections.

Calendar year ballot requests for military and overseas voters that are not indefinitely confined expire on December 31st of each year. All regular military and overseas voters must submit a new absentee request each year and can only request ballots for one calendar year in duration.

This guidance attempts to combine both processes, but, as described above, causes compliance complications across the two statutes. It is not correct to send a military or overseas voter a “30-day letter” or to continue sending absentee ballots in future calendar years without a new request, and it is not correct to allow an indefinitely confined elector to receive a ballot by email.

After receiving questions from clerks and examining these statutes, staff believe the Commission may want to revisit this guidance, and that clerks should instead exclusively follow either the military and overseas maintenance procedures or the indefinitely confined procedures. This would require a change in the manuals and a change in MyVote to prevent this issue from occurring in the future. It would also require outreach to voters who fall under the current guidance to determine which status they wish to use.

Possible solutions:

Generally, military and overseas voters are afforded the same benefits as voters who qualify under the indefinitely confined status with the significant benefit of being able to receive ballots by email. This benefit goes beyond state law and is also required by federal law. 52 U.S.C. 20302(f). Neither procedure requires a voter to show an ID under Wis. Stat. § 6.87(1) to make a sufficient request, and each is a continuing request unless otherwise specified. If a voter qualifies to receive ballots by email due to being military or overseas status, staff recommend that a voter do so. The only downside would be the need to submit a new request for absentee ballots once a year.

To prevent future absentee ballot requests from including indefinitely confined status for military and overseas voters, staff recommend making a change to MyVote so that the indefinitely confined absentee option would be removed once a voter identifies themselves as military or overseas. This would reduce the occurrence of this issue. For voters who do not use MyVote to send an absentee ballot request, staff recommend a slight change to the absentee ballot request form stating that a voter cannot select both the indefinitely confined bubble and military or overseas bubbles. If a request arrives that does select more than one of these bubbles, staff recommend that our manuals state that clerks should reach out to the voter to determine which status is correct.

¹ Available at: <https://elections.wi.gov/resources/manuals/military-and-overseas-voter-manual>.

Regarding military and overseas voters who already have sent absentee ballot applications that have been accepted as indefinitely confined as currently described in the manual section quoted above, staff recommend that clerks reach out to these voters to determine which is correct, and to send future absentee ballots under the correct process.

For this meeting, staff seek the Commission's approval not to implement anything but to complete the following which would be brought to the commission at a later meeting for approval:

- Design a change to MyVote
- Draft an update the UOCAVA manual and the absentee ballot request form
- Draft a clerk communication to clerks explaining the new policy and recommended next steps

The aim would be to implement these changes after the Spring Election so that clerks have the remainder of 2025 to contact voters and ensure that all statuses are correct before the 2026 elections begin.

Recommended Motion:

The Commission directs staff to design, but not implement, a change to MyVote so that users cannot select the indefinitely confined and military and overseas processes at the same time. The Commission also directs staff to bring back for Commission approval draft updates to the UOCAVA manual and absentee ballot request form consistent with this memo and the discussion at today's meeting and a draft clerk communication for clerks with combined status absentee voters that explains the new policy and that they need to conduct outreach to these voters.



Wisconsin Elections Commission

201 West Washington Avenue | Second Floor | P.O. Box 7984 | Madison, WI 53707-7984
(608) 266-8005 | elections@wi.gov | elections.wi.gov

DATE: Prepared for the April 17, 2025, Commission Meeting

TO: Members, Wisconsin Elections Commission

FROM: Angela O'Brien Sharpe, Staff Attorney

SUBJECT: EL Chapter 19 (Certification of Residence) Rule Order, Economic Impact Analysis, and Draft Public Hearing Notice

ATTACHMENTS: **Attachment A:** Economic Impact Analysis Comment Period Documentation

Attachment B: Draft Final Rule Order for Permanent Rule

Attachment C: Draft Economic Impact Analysis & Fiscal Estimate

Attachment D: Draft Notice of Submittal of Proposed Rule to Legislative Council Rules Clearinghouse

Attachment E: Draft Notice of Public Hearing and Comment Period

Introduction:

On March 12, 2025, the Wisconsin Elections Commission (“the Commission”) approved the text of the proposed permanent administrative rules relating to the certification of residence process for judicial officers and judicial candidates on nomination papers and declarations of candidacy. Staff have taken the steps approved on March 12 to proceed with the permanent rulemaking promulgation.

Permanent Rule Update:

On March 17, 2025, a notice of a comment period on the Economic Impact Analysis (“EIA”) was published in the administrative register, which also contained links for the public to submit economic comments. Individuals could provide any comments on the EIA until March 31, 2025. No comments on the EIA were received. Documentation related to the comment period for the EIA is included as **Attachment A**. Also on March 17, 2025, staff published a draft of the EL Chapter 19 Rule Order and Economic Impact Analysis as a clerk communication, which contained links to the documents on the Commission website and a description of how comments on the EIA could be submitted. A reminder about the EIA comment period was also included in the Commission’s newsletter on March 25, 2025.

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Permanent Rulemaking – Next Steps:

Staff now ask the Commission to review and approve the draft Rule Order, the EIA, and Fiscal Estimate for submission to the Rules Clearinghouse. Staff also ask the Commission to consider a draft notice of submission to the Rules Clearinghouse and a draft notice for a public hearing and comment period. The Commission should consider whether it wishes to make any changes to the Rule Order or the EIA.

Draft Rule Order and Economic Impact Analysis

The Commission must finalize the Draft Rule Order and the EIA before staff can submit them to the appropriate offices. Those documents have been included as **Attachment B** and **Attachment C**.

Submission to the Legislative Council’s Rules Clearinghouse

If the Commission approves the rule order and EIA at today’s meeting, the next step is for staff to submit those documents to the Legislative Council pursuant to § 227.15(1). Staff must also submit a Notice of Submittal of Proposed Rule to the Legislative Council Clearinghouse along with these documents to the LRB and to the secretary of administration. Wis. Stat. § 227.15(1). A copy of this notice is included as **Attachment D**.

Public Hearing Notice

The Commission must submit a notice for a public hearing and comment period for the permanent rule. Wis. Stats. §§ 227.16, 227.17. The hearing cannot be held until the Legislative Council issues its analysis or until the initial review period of 20 working days has expired, whichever comes first. Wis. Stat. § 227.15(1). In addition, notice for the public hearing must be given at least 10 days prior to the date set for the hearing. Wis. Stat. § 227.17(2).

Accordingly, staff recommend that the Commission notice the hearing for **Wednesday, May 21, 2025, from 1 p.m. to 3 p.m.**

The notice for this hearing must be approved by the Commission, and the Commission must publish the notice in the Administrative Register, send it to the secretary of administration, and provide whatever notice it believes is necessary to interested persons. Wis. Stat. § 227.17(1) & (2m). Consistent with other rulemaking procedures, staff recommend publishing the notice on the Commission’s website under the rules section and within the calendar, as well as publishing a clerk communication with a link to the notice. A copy of the proposed notice has been included as **Attachment E**.

Recommended Motion: Staff shall update the draft Rule Order and finalize the EIA as directed by the Commission during this meeting, if necessary. Staff shall finalize the draft notice for the hearing and comment period and the draft notice of submission to the rules clearinghouse as directed by the Commission during this meeting, and take all necessary steps to publish those notices in the administrative register and as needed to provide the public with notice of the hearing as directed during this meeting. Staff shall send the notice of hearing to the secretary of administration. Staff shall submit the EIA to the Department of Administration, the governor, and to the chief clerks of each house of the Legislature. Staff shall submit the Draft Rule Order and EIA and Fiscal Estimate to the Legislative Council’s Rules Clearinghouse.

**WISCONSIN ELECTIONS
COMMISSION**

EIA Comment Period for EL-19

Monday, March 17, 2025

To: **City of Milwaukee Election Commission** **Milwaukee County Election Commission**
Wisconsin County Clerks **Wisconsin Municipal Clerks**

Priority: Timely Attention

At this link, <https://elections.wi.gov/draft-rule-chapter-19-confidentiality-judicial...>, is a draft Economic Impact Analysis (EIA) and a draft rule order for an administrative rule proposed by the Wisconsin Elections Commission. The rule proposes to carry out a new statute, Wis. Stat. § 8.10(8), concerning nomination papers and declarations of candidacy, and the law and rule may affect your ballot access process.

In short, the law allows judicial officers and judicial candidates who certify their residence with the Commission to withhold their residential address on nomination papers and declarations of candidacy. The rule would provide the procedures for individuals to certify their residence with the Commission, explains that the Commission must communicate this information with affected county and municipal clerks, and provides that individuals who have successfully filed may add "Residence Certified with WEC" on nomination papers and declarations of candidacy in lieu of their residential address.

The rule is now in the economic impact comment phase, and you may provide comments on any economic impacts you believe would result from the rule. You may also ask to coordinate with the Commission on preparing the EIA. Please review the notice, scope statement, draft EIA and draft rule order and provide any comments by Monday, March 31, 2025.

Memo Type: **Clerk Communication**

Public Notice: Soliciting Comments Regarding an EIA

Elections Commission (EL)

Related to: Confidentiality of judicial officer information on certain election materials

Notice Soliciting Comments Regarding an Economic Impact Analysis

Subject: Proposed rule relating to confidentiality of judicial officer information on certain election materials

Notice Date: March 17, 2025

Comment Period: March 17, 2025 – March 31, 2025

The Wisconsin Elections Commission (Commission) is preparing an economic impact analysis (EIA) for the proposed rule under Scope Statement 096-24 relating to confidentiality of judicial officer information on certain election materials. The scope statement, a preliminary draft of the EIA and a preliminary draft of the rule order are available on the Commission's website, here: <https://elections.wi.gov/draft-rule-chapter-19-confidentiality-judicial-officer-information-certain-election-materials>. The draft documents may be updated following the receipt and consideration of EIA comments.

The Commission must solicit comments on the economic impact of the proposed rule and, if requested, coordinate with local governments on the EIA. The Commission will accept written comments for its confidentiality of judicial officer information on certain election materials rule **until 5 p.m. on March 31, 2025**. Please provide specific information and include any supporting economic data. Please do NOT submit comments on revisions to the rule language. The Commission will hold a separate hearing and comment period for comments on the rule language after proper notice in accordance with ss. 227.17 and 227.18, Stats.

EIA comments may be emailed to brandon.hunzicker@wisconsin.gov or mailed to Brandon Hunzicker, Wisconsin Elections Commission, P.O. Box 7984, Madison, WI 53707-7984.

Any local government unit affected by the rule – this rule would primarily affect municipal clerks and county clerks – may request to coordinate with the Commission on the EIA. Please state this request within your EIA comments. The Commission will contact all local government units that request to coordinate and incorporate their comments into the EIA to the extent feasible.

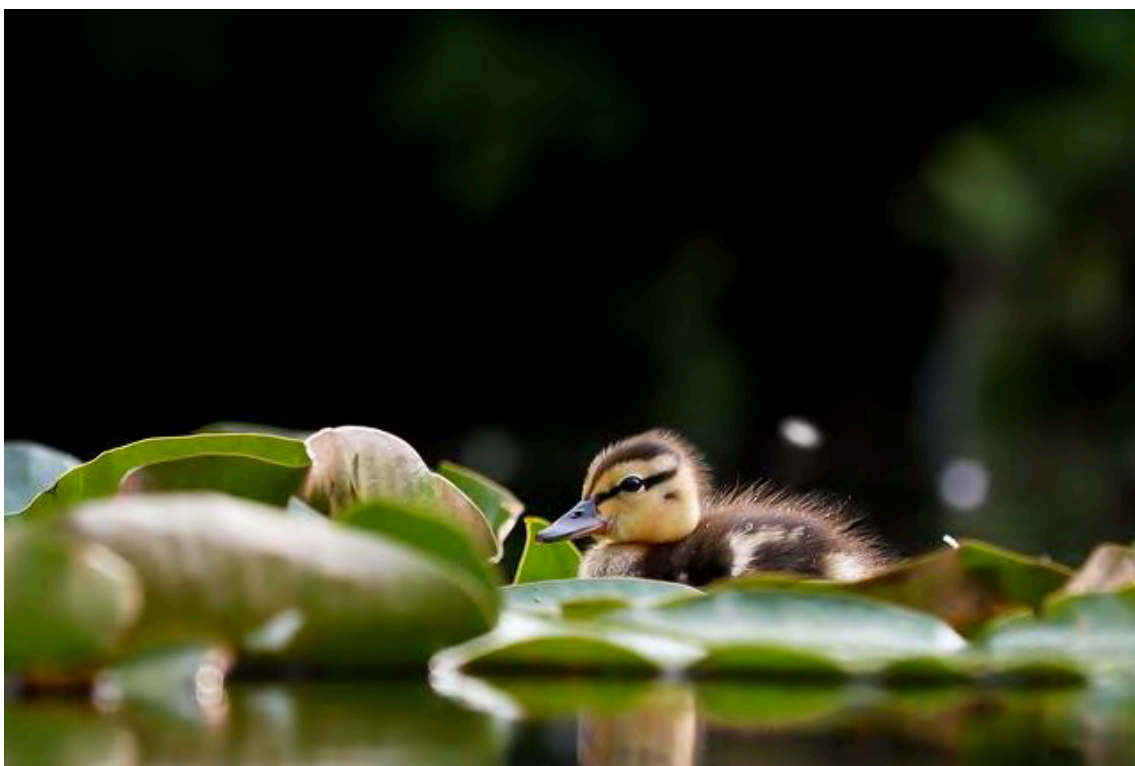
Under section [227.137](#), Stats., the Commission is soliciting comments on the information listed below:

1. Any implementation or compliance costs that are reasonably expected to be incurred.
2. Actual quantifiable benefits of the proposed rule.
3. Whether the proposed rule would adversely affect in a material way the economy, a sector of the economy, productivity, jobs, or the overall economic competitiveness of the state.
4. Economic impacts of specific alternatives to the proposed rule.
5. Any other economic impacts, or any impacts on the free use of private property, to any affected party

The scope statement did not estimate any economic impact to small businesses, but if you are a small business as defined in § 227.114(1), Stats., please let us know in your comments.

When the EIA is ready, the Commission will submit the rule order and economic impact analysis to the Wisconsin Legislative Council under § 227.15, Stats.

Links to Admin. Code and Statutes in this Register are to current versions, which may not be the version that was referred to in the original published document.



Spring is just around the corner!
Stock Photo.

Contents

- [New Judicial Officer Protection Law](#)
- [Early Bird Pricing Ends Soon!](#)
- [Wait on Badger Book Updates](#)
- [Common Tech Tips](#)
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Join the Accessibility Advisory Committee

The WEC is looking for two municipal clerks who are passionate about accessible voting to join the Accessibility Advisory Committee (AAC). The AAC is made up of local disability

advocacy organizations with interests in voting rights. Members attend monthly hour-long virtual meetings and provide vital feedback on materials and WEC initiatives to ensure we are prioritizing accessibility. If you think that you would be a good fit for this group, please follow the link to complete the application. **This application closes Friday April 11th at 11:59pm.**

Apply Here!



Photo (https://flic.kr/p/2nMoEwQ?utm_campaign=V_III&utm_medium=email&utm_source=newsletter) by Focal Foto via [Creative Commons](#).

Judicial Privacy Laws Take Effect April 1

What Clerks Need to Know

Coinciding with the Spring Election, Wis. Stat. § 8.10(8) and Wis. Stat. § 757.07 become active and will affect public records and future ballot access procedures. There are two separate processes related to judicial officers to be aware of.

A judicial officer is a supreme court justice, court of appeals judge, circuit court judge, municipal judge, tribal judge, temporary or permanent reserve judge, or a circuit, supplemental, or municipal court commissioner. Wis. Stat. § 757.07(1)(e).

Regarding public records

You may receive a request under § 757.07(4) from a judicial officer to remove from published sources and to withhold personal information regarding the officer or individuals in the officer's household. This request would likely include certain election-related documents such as absentee ballot certificate envelopes and voter registration forms, as well as extending into non-election-related documents that may be in the possession of your office.

Regarding ballot access

You may receive a communication from the WEC that a judicial officer or judicial candidate has certified his or her residence with the WEC. If a proper form is filed with the WEC, the officer would be able to write "Residence Certified with WEC" in lieu of providing an address on nomination papers and declarations of candidacy. If you see this statement during ballot access, you will need to look up the certificate of residence, which will be maintained by the WEC.

The Commission is currently promulgating a rule concerning these new ballot access procedures. The rule is [available for review](https://elections.wi.gov/memo/eia-comment-period-el-19?utm_campaign=V_Ill&utm_medium=email&utm_source=newsletter) (https://elections.wi.gov/memo/eia-comment-period-el-19?utm_campaign=V_Ill&utm_medium=email&utm_source=newsletter) and you can provide comments on any economic impacts by Monday, March 31.

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Photo (https://flic.kr/p/2iQZHT5?utm_campaign=V_Ill&utm_medium=email&utm_source=newsletter) by Courtney Celley/USFWS.

Early Bird Pricing Ends April 1

Reserve your spot today!

We are pleased to announce that registration for the inaugural Wisconsin Elections Commission Clerks Conference is now LIVE! We invite you to join us at the Central Wisconsin Convention & Expo Center in Rothschild on Sept. 30 and Oct. 1. This year's event promises to be an exciting opportunity for learning and networking.

Register now: [Online](#) or see the email from February 3 for the pdf form. The regular registration period ends June 1.

We are excited to welcome you all to the WEC Clerks Conference and we can't wait to see you there! If you have any questions, please reach out to us at elections.training@wi.gov.

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DRAFT ORDER OF THE WISCONSIN ELECTIONS COMMISSION CREATING RULES

The Wisconsin Elections Commission adopts the following permanent rule to create EL 19, relating to confidentiality of judicial officer information on certain election materials.

The statement of scope for this rule, SS 096-24, was approved by the Office of Wisconsin Governor Tony Evers on August 1, 2024, published in Register No. 824B, on August 26, 2024, and approved by the Wisconsin Elections Commission on September 11, 2024.

RULE ANALYSIS

1. Statutes Interpreted:

Section 8.10(8), Stats.

2. Statutory Authority:

Sections 5.05(1)(f), 8.10(8)(a), and 227.11(2)(a), Stats.

3. Explanation of Agency Authority:

Section 5.05(1)(f), Stats., allows the Commission to “Promulgate rules under ch. 227 applicable to all jurisdictions for the purpose of interpreting or implementing the laws regulating the conduct of elections or election campaigns, other than laws regulating campaign financing, or ensuring their proper administration.”

Section 8.10(8)(a) explains the ability of judicial officers and candidates to withhold residency information on nomination papers and declarations of candidacy and requires the Commission to “promulgate rules for the administration of this subsection and prescribe a certification of residence for a candidate or circulating judicial officer for use under this subsection.”

Section 227.11(2)(a), Stats., authorizes an agency to promulgate rules interpreting the statutes administered by the agency.

4. Related Statutes:

Sections 8.10(2)&(4), 8.21(4)(b), 19.36(15), and 757.07 Stats. Section 8.10(8), Stats., modifies the process of completing nomination papers and declaration of candidacy documents by judicial officers and judicial candidates under Sections 8.10(2)&(4) and 8.21(4)(b). Section 19.36(15), Stats., clarifies that when a judicial officer or judicial candidate submits a certification of residence with the Commission, that document is not subject to public records requests. Section 757.07, Stats., contains the other privacy provisions for judicial officers created by 2023 WI Act 235.

5. Plain Language Analysis:

The proposed administrative rule carries out the legislative directive in Wis. Stat. § 8.10(8) for the Wisconsin Elections Commission to promulgate rules to allow judicial candidates and judicial officers to withhold their residential address information on nomination papers and declarations of candidacy. The rule prescribes what must be included on the certificate of residence that must be submitted to the Commission and how the Commission will process a form once received. The rule details the specific instances in which a judicial candidate and judicial officer may withhold residential information and instead add "Residence Certified with WEC" in the spaces on the forms asking for residence information. The rule also details how the Commission will communicate this information to the municipal or county clerks who may be processing nomination papers and declarations of candidacy signed by such officers and candidates. The rule also details that a new form must be submitted when any information on the form changes, such as running for election to a new office or for reelection, or if an address changes.

Section EL 19.01 defines terms relevant to the process for judicial officers and judicial candidates to submit certification of residence forms.

Section EL 19.02 details the information that must be included in order for a certification of residency form to be sufficient.

Section EL 19.03 provides what a may be submitted as a proof of residency document, and how the document may be submitted.

Section EL 19.04 provides how the Commission will verify the address provided and how the Commission.

Section EL 19.05 provides how the Commission will maintain the information provided on certificates of residency.

Section EL 19.06 provides the procedures that must be followed by judicial officers and candidates, and by the Commission, county clerks, and municipal clerks following the proper filing of a certificate of residency with the Commission.

6. Summary of, and Comparison With, Existing or Proposed Federal Regulations:

Wis. Stat. § 8.10(8) was created by 2023 WI Act 235, which is closely related to recent federal legislation protecting the information of federal judicial officers. The federal law is the Daniel Anderl Judicial Security and Privacy Act of 2021, which passed as a part of the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, 117 P.L. 263; 2022 Enacted H.R. 7776; 117 Enacted H.R. 7776; 136 Stat. 2395. It is Section 5931-39 of the legislation. The federal law aimed to prohibit the public posting of certain personal identifying information of federal judges or their immediate family members and includes any home address of the officer. This rule relates more narrowly to residence information on declarations of candidacy and nomination papers but is otherwise in keeping with the federal law. However, it should be noted that the state law does not apply to federal judicial officers and only applies to Wisconsin judicial officers under the state system. The Commission has requested that the legislature amend the legislation to include federal officers.

7. Summary of Comments Received During Preliminary Comment Period and at Public Hearing on Statement of Scope

The Commission did not receive a directive from the Joint Committee for the Review of Administrative Rules to hold a preliminary public hearing and did not hold a preliminary hearing, and it has not yet held the public hearing for the rule.

8. Comparison with Similar Rules in Illinois, Iowa, Michigan, and Minnesota

Illinois enacted their own Judicial Privacy Act effective September 22, 2012. The Judicial Privacy Act covers Federal as well as State judges and their immediate families. Any judge in the district or circuit, appellate, or the highest court in the state is covered by the act. Bankruptcy judges are also included in the act. The act includes any blood relative of the judge or their spouses who live in the same residence as the judge. 705 ILCS § 90/1-10. The act protects information about a home address, home phone number, cellphone number, pager number, personal email address, social security number, federal tax identification number, checking and savings account numbers, credit card numbers, marital status, and the identity of a child under the age of 18. 705 ILCS § 90/1-10 Like the federal act, the Illinois act prohibits a government agency from posting this information or displaying it publicly. 705 ILCS § 90/2-1(a). If such protected information is displayed a covered individual may make a written request that the information be removed.

Iowa also has a law like the federal Judicial Security and Privacy Act. The legislature, in a 2017 amendment, added judges into their address confidentiality program that functions to protect the identity of individuals

who seek to avoid domestic abuse and their abusers. Under § 9E.2(2), active or retired state and local judges, federal judges, and the spouse or children of the judge may participate in the program. A state judge includes a supreme court justice, an appellate judge, a district court judge, magistrate judge, associate juvenile judge, associate probate judge, or a magistrate. If an individual is only temporarily serving in that role they are also included in the program. An individual must apply for the protection program. They must include identifying information like their name and address as well as why they fear for their safety or the safety of another person in their household. Iowa Code § 9E.3(1). If any of the identifying information changes the applicant must also inform the secretary of state of those changes. The act provides that program participants' name, address, and phone number are confidential information and may not be disclosed unless ordered by a court or pursuant to state or federal law. Iowa Code § 9E.7.

Minnesota has an equivalent to the Judicial Security and Privacy Act, which took effect on August 1, 2024. The act protects current, senior, and retired judges, as well as judicial referees and magistrate judges, of the state courts of Minnesota. The act also protects current and retired employees of the Minnesota judicial branch, and current employees of the Office of Administrative Hearsings, Workers' Compensation Court of Appeals, and the Tax Court. Minn. Code § 480.40(1)(b). The act protects against release the residential address of the judge, their spouse, domestic partner, or child, a personal phone number or email address, the names of their children, the name of any child care facility or school the judges children attend, however, the information can still be accessed through a federal, state, or local record request. A judicial official may also waive protection by disclosing that information themselves or to another person if they do not restrict that other person from further disclosure. Minn. Code § 480.40(1)(c), (d). The act prohibits people, businesses, associations, or government entities from knowingly posting, displaying, publishing, selling, or making available protected information. Minn. Code § 480.40(2).

It does not appear that Michigan has enacted legislation or rules on the topic of judicial officer privacy.

9. Summary of Factual Data and Analytical Methodologies

The Commission met on March 7 and 12, 2025, to discuss the draft rule. The Commission may make changes to the rule in response to feedback on the EIA and after the public hearing. Commission staff examined the current nomination paper and declaration of candidacy procedures and statues during the drafting of the rule.

10. Analysis and Supporting Documents used to Determine Effect on Small Business

There is no anticipated effect on small business. No specific analysis was performed for the fiscal estimate, nor were any supporting documents generated, because there is no anticipated effect on any fiscal liabilities and revenue, and no anticipated costs to be incurred by the private sector.

11. Effect on Small Business (initial regulatory flexibility analysis):

N/A

Agency Contact Person:

Angela O'Brien Sharpe, Staff Attorney
Wisconsin Elections Commission
201 West Washington Avenue
P.O. Box 7984
Madison, WI 53707-7984
Telephone: 608-264-6764
Email: angela.sharpe@wisconsin.gov

RULE TEXT

EL 19 Judicial Privacy Protections

19.01 DEFINITIONS

19.01(a) “Certification of Residence” means a document authorized by s. 8.10(8)(a) and applied for pursuant to this chapter.

19.01(b) “Judicial candidate” means a candidate for filling the office of a judicial officer, as defined in s. 757.07(1)(e).

19.01(c) “Judicial officer” has the meaning given in s. 757.07(1)(e).

19.01(d) “Proof of residence” has the meaning given in s. 6.34(3).

19.01(e) “Residential address” means street name and number, apartment or unit number, municipality, state, and ZIP code that identifies the individual’s residence under s. 6.10. Residential address as used in this chapter may also include a mailing address if the mailing address identifies the same residence.

19.01(f) “WEC” means the Wisconsin Elections Commission

19.02 APPLICATION

19.02(a) In order to file a lawful certification of residence with the commission, a judicial officer or judicial candidate must complete a certification of residence form prescribed by the commission pursuant to this chapter. A request for protection of personal information made pursuant to s. 757.07(4)(b)1. is not sufficient by itself to file a certification of residence pursuant to s. 8.10(8)(a).

19.02(b) A judicial officer or judicial candidate who wishes to be properly exempt from providing their residential address pursuant to s. 8.10(8) must file a certification of residence before circulating or signing nomination papers or submitting a declaration of candidacy.

19.02(c) A judicial officer seeking to maintain a private address under s. 8.10(8)(a), Stats., shall file the certification of residence form currently prescribed by the commission for that purpose. A sufficient form must contain all of the following:

19.02(c)(1) Full legal name of judicial officer or judicial candidate.

19.02(c)(2) Name that will appear on a judicial candidate’s declaration of candidacy and nomination papers.

19.02(c)(3) Judicial officer designation category under s. 757.07(1)(e).

19.02(c)(4) A judicial candidate must indicate the title; jurisdiction; branch, district, or jurisdiction; and date of election for the office sought.

- 19.02(c)(5) The address of the judicial officer or judicial candidate's residence for voting purposes, as defined by s. 6.10(1) Stats., which must include the street name and number, apartment/unit number, municipality, state, and ZIP code.
- 19.02(c)(6) Mailing address if different from the residential address.
- 19.02(c)(7) Email address.
- 19.02(c)(8) The following certification language: "I hereby certify that I am currently or formerly a judicial officer, or that I intend to be a candidate for filling the office of a judicial officer, as defined by Wis. Stat. § 757.07(1)(e). This form constitutes my written request to the Wisconsin Elections Commission to confidentially maintain my address unless I consent to disclosure under Wis. Stat. § 757.07(4)(e).

I certify that the residential address that I provided is the place where my habitation is fixed, without any present intent to move, and to which, when absent, I intend to return. I certify that the accompanying proof of residence submitted with this application accurately reflects my current legal name and residential address.

I certify that the information I provided in this application is true and correct. I understand that falsifying any portion of this application could result in prosecution and penalties, including, but not limited to, Wis. Stat. §§ 12.13(1)(b) and 12.13(3)(a).

I understand that I will need to submit a new request for certification of residence if there is any material change in the information presented on this application, including a change in address or election date.

I understand on what date I am required to be a resident of the jurisdiction for the office sought and that I may be required to move to qualify for the office.

I understand that if I am a judicial officer, I may place "Residence Certified with WEC" on my own nomination papers and Declaration of Candidacy for the office of a judicial officer in lieu of providing my residential address and, as a signatory or circulator, on the nomination papers of other nonpartisan candidates.

I understand that if I am only a candidate for filling the office of a judicial officer, I may place "Residence Certified with WEC" on my own nomination papers and Declaration of Candidacy for that office in lieu of providing my residential address.

I understand that a filing officer may contact me in writing to confirm that my residential address is still accurate or to request an updated form, and that I must confirm the accuracy of my residence or provide an updated form if requested.

I understand that the Wisconsin Elections Commission will maintain the confidentiality of my certification of residence and share it only with my filing officer unless compelled to release the information by a court or other lawful authority, or unless I consent to its release."

- 19.02(c)(9) A notarization or an unsworn declaration.

19.03 VERIFICATION OF ADDRESS

19.03(a) At the time of filing, a judicial officer or judicial candidate shall submit proof of residence, as defined by s. 6.34(3), so that the commission can verify the judicial officer or judicial candidate's residential address. The proof of residence document may be submitted electronically.

19.03(b) The proof of residence submitted under sec. (a) is considered part of the certification of residence under this chapter and shall be kept confidential by the commission

19.04 CERTIFICATION OF RESIDENCE, PROCEDURE

19.04(a) Upon receipt of a certification of residence form under sec. 19.02, the commission shall first examine it for sufficiency. If the application is insufficient or does not include acceptable proof of residence under sec. 19.03, the commission should contact the judicial officer within three (3) business days to notify them of the deficiency and provide instructions for how it can be corrected.

19.04(b) If the application is sufficient, the commission shall then examine the provided proof of residence document to ensure that it meets the requirements of s. 6.34(3)(a). If it does, the commission shall conclude that the judicial officer or judicial candidate's residential address is verified.

19.04(c) Nothing in this section exempts a judicial candidate from a ballot access challenge, or guarantees placement on the ballot.

19.04(d) If both the certification of residence form and proof of residence are sufficient, the commission shall issue an acknowledgement of the filing of the certification of residence.

19.04(e) The acknowledgement of the certification of residence shall be issued on commission letterhead and shall state substantially the following: "The Wisconsin Elections Commission has verified the residential address of (Name of Judicial Officer or judicial candidate) pursuant to Wis. Stat. § 8.10(8) and EL Chapter 19. (Name of Judicial Officer or judicial candidate) is exempt from providing his or her residential address on his or her own nomination papers and declarations of candidacy." If the individual is judicial officer, the acknowledgement shall also state that the judicial officer is exempt from providing his or her residential address as a circulator or as signatory on the nomination papers of a nonpartisan candidate.

19.05 MAINTENANCE OF CERTIFICATION OF RESIDENCE, PROCEDURE

19.05(a) The commission shall create and confidentially maintain a database for sufficient certifications of residence.

19.05(b) The commission shall record that the judicial officer or judicial candidate's address was verified, the date of filing, along with the judicial officer or judicial candidate's name.

19.05(c) If the certification of residence is received by the commission, the commission shall notify the judicial officer within three (3) business days of the determination of sufficiency.

19.06 PROCEDURE FOR NOMINATION PAPERS AND DECLARATIONS OF CANDIDACY

- 19.06(a) A judicial officer who properly files a certification of residence and has been issued an acknowledgement by the commission may, in lieu of providing their residential address on nomination papers or a declaration of candidacy, include the words “Residence Certified with WEC.” If “Residence Certified with WEC” has been included at least once on an appropriate form for an individual with a certificate on file, subsequent spaces requiring residence information may use an abbreviated version.
- 19.06(a)(1) If a judicial officer or judicial candidate does not include the words in sec. 19.06(a), that omission shall not invalidate the nomination paper, signature, line, circulator statement, or declaration of candidacy if the commission or filing officer can determine that the judicial officer or judicial candidate properly filed a certification of residence.
- 19.06(a)(2) If the space for a mailing address on a nomination paper is left blank for a judicial candidate that has filed a certificate of residence with the commission, the filing officer shall conclude that the mailing address is the same as the residential address for voting purposes that has been certified. If the mailing address is different than the residential address for voting purposes but still identifies the same residence, the candidate may leave the space blank or write “Residence Certified with WEC” in that space. Candidates may include a mailing address that is separate from the residence, and, if included, that information shall not be confidential.
- 19.06(b) If a judicial candidate indicates on the application that he or she intends to run as a candidate for an office for which the commission is not the filing officer, the commission shall provide the appropriate filing officer with the information provided on the certification of residence, as well as the county clerks covering the applicable district(s).
- 19.06(c) Filing officers may also contact the commission directly to determine whether a certification of residence has been filed.
- 19.06(d) A Judicial officer or a judicial candidate to fill the office of a judicial officer may only place “Residence Certified with WEC” on a nomination paper or declaration of candidacy if the information on file is accurate. If the information is inaccurate, including residence address, office sought, or election date, the judicial officer or judicial candidate must resubmit the form with updated information to qualify for the provisions of this chapter.
- 19.06 (e) If in receipt of nomination papers or a declaration of candidacy containing “Residence Certified with WEC,” and the filing officer has reason to believe that the address certified is no longer the correct address, a filing officer may request that a candidate confirm in writing that the address that was certified by the Commission is still the residential address or that a an updated certification be filed.

ADMINISTRATIVE RULES

Fiscal Estimate & Economic Impact Analysis

1. Type of Estimate and Analysis <input checked="" type="checkbox"/> Original <input type="checkbox"/> Updated <input type="checkbox"/> Corrected	2. Date 3/17/2025								
3. Administrative Rule Chapter, Title and Number (and Clearinghouse Number if applicable) Chapter EL 19, Confidentiality of Judicial Officer Information on Certain Election Materials									
4. Subject The proposed administrative rule carries out the legislative directive in Wis. Stat. § 8.10(8) for the Wisconsin Elections Commission to promulgate rules to allow judicial candidates and judicial officers to withhold their residential address information on nomination papers and declarations of candidacy. The rule prescribes what must be included on the certificate of residence that must be submitted to the Commission and how the Commission will process a form once received. The rule details the specific instances in which a judicial candidate and judicial officer may withhold residential information, and instead add "Residence Certified with WEC" in the spaces on the forms asking for residence information. The rule also details how the Commission will communicate this information to the municipal or county clerks who may be processing nomination papers signed by such officers and candidates. The rule also details that a new form must be submitted when any information on the form changes, such as running for election to a new office or for reelection, or if an address changes.									
5. Fund Sources Affected <input checked="" type="checkbox"/> GPR <input type="checkbox"/> FED <input type="checkbox"/> PRO <input type="checkbox"/> PRS <input type="checkbox"/> SEG <input type="checkbox"/> SEG-S	6. Chapter 20, Stats. Appropriations Affected Wis. Stat. s. 20.510								
7. Fiscal Effect of Implementing the Rule <table style="width: 100%;"><tr><td><input checked="" type="checkbox"/> No Fiscal Effect</td><td><input type="checkbox"/> Increase Existing Revenues</td><td><input type="checkbox"/> Increase Costs</td><td><input type="checkbox"/> Decrease Costs</td></tr><tr><td><input type="checkbox"/> Indeterminate</td><td><input type="checkbox"/> Decrease Existing Revenues</td><td colspan="2"><input type="checkbox"/> Could Absorb Within Agency's Budget</td></tr></table>		<input checked="" type="checkbox"/> No Fiscal Effect	<input type="checkbox"/> Increase Existing Revenues	<input type="checkbox"/> Increase Costs	<input type="checkbox"/> Decrease Costs	<input type="checkbox"/> Indeterminate	<input type="checkbox"/> Decrease Existing Revenues	<input type="checkbox"/> Could Absorb Within Agency's Budget	
<input checked="" type="checkbox"/> No Fiscal Effect	<input type="checkbox"/> Increase Existing Revenues	<input type="checkbox"/> Increase Costs	<input type="checkbox"/> Decrease Costs						
<input type="checkbox"/> Indeterminate	<input type="checkbox"/> Decrease Existing Revenues	<input type="checkbox"/> Could Absorb Within Agency's Budget							
8. The Rule Will Impact the Following (Check All That Apply) <table style="width: 100%;"><tr><td><input type="checkbox"/> State's Economy</td><td><input type="checkbox"/> Specific Businesses/Sectors</td></tr><tr><td><input checked="" type="checkbox"/> Local Government Units</td><td><input type="checkbox"/> Public Utility Rate Payers</td></tr><tr><td colspan="2"><input type="checkbox"/> Small Businesses (if checked, complete Attachment A)</td></tr></table>		<input type="checkbox"/> State's Economy	<input type="checkbox"/> Specific Businesses/Sectors	<input checked="" type="checkbox"/> Local Government Units	<input type="checkbox"/> Public Utility Rate Payers	<input type="checkbox"/> Small Businesses (if checked, complete Attachment A)			
<input type="checkbox"/> State's Economy	<input type="checkbox"/> Specific Businesses/Sectors								
<input checked="" type="checkbox"/> Local Government Units	<input type="checkbox"/> Public Utility Rate Payers								
<input type="checkbox"/> Small Businesses (if checked, complete Attachment A)									
9. Estimate of Implementation and Compliance to Businesses, Local Governmental Units and Individuals, per s. 227.137(3)(b)(1). \$0.00									
10. Would Implementation and Compliance Costs Businesses, Local Governmental Units and Individuals Be \$10 Million or more Over Any 2-year Period, per s. 227.137(3)(b)(2)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No									
11. Policy Problem Addressed by the Rule Wis. Stat. § 8.10(8) allows judicial officers and judicial candidates to withhold residential information on nomination papers and declaration of candidacy forms, but does not address the specific mechanics of carrying out these processes on the state and local level. The rule provides these mechanisms and prescribes what information must be included on a certificate of residency document. The rules will clarify for judicial candidates, judicial officer, and local municipal and county clerks what needs to be submitted, when, and what needs to change after a sufficient certificate has been received and acknowledged by the Commission.									
12. Summary of the Businesses, Business Sectors, Associations Representing Business, Local Governmental Units, and Individuals that may be Affected by the Proposed Rule that were Contacted for Comments. The rule will allow former and current judicial officers, as well as candidates for such offices, to withhold their residential address information on nomination papers and declarations of candidacy, though it would not require them to do so. The rule will also affect the Commission and municipal and county clerks, who will receive certificate of residence forms and who will need to use those forms when reviewing nomination papers and declarations of candidacy. The rule provides a mechanism for the Commission to notify clerks when a form pertaining to their jurisdiction is received, and to maintain a database that can be consulted when necessary. The rule would not affect any businesses, business sectors, associations, or any individuals who are not judicial officers or candidates.									

ADMINISTRATIVE RULES

Fiscal Estimate & Economic Impact Analysis

13. Identify the Local Governmental Units that Participated in the Development of this EIA.

To be determined

14. Summary of Rule's Economic and Fiscal Impact on Specific Businesses, Business Sectors, Public Utility Rate Payers, Local Governmental Units and the State's Economy as a Whole (Include Implementation and Compliance Costs Expected to be Incurred)

Minimal. Judicial Officers and Candidates may choose to submit a certificate of residence document if they choose, but there would be no cost to them to do so. Municipal and County clerks already need to review nomination papers and declaration of candidacy documents for sufficiency, and if they see a form with "Residence Certified with WEC" on such a form, they will need to check to see if a proper certificate of residency has been filed, and the WEC database would be available for this purpose. It may add a small amount of time for the limited number of documents that would contain this information, but should not require hiring any new staff or purchasing any materials. The Commission itself will need to establish procedures and a database to carry out the processes, but it will also not need to hire any additional staff to perform these tasks.

15. Benefits of Implementing the Rule and Alternative(s) to Implementing the Rule

The benefit of implementing this rule is that rulemaking on this topic is required by Wis. Stat. § 8.10(8) and will provide judicial officers and candidates with the information they need to submit certificate of residency forms and the subsequent process for filling out nomination papers and declaration of candidacy documents, and it will provide municipal and county clerks with the information they need to evaluate nomination papers and declarations of candidacy that are submitted to them. The only alternative to implementing this rule is for the Commission to rely on guidance in carrying out the new statutory process instead of promulgating those processes by rule, as required.

16. Long Range Implications of Implementing the Rule

The proposed rule does not impose any financial or compliance burdens that will have an effect on small businesses or a significant economic impact. Judicial officers and candidates may make use of this option, and local clerks will need to properly administer forms submitted by such individuals. Once the new procedures are in place, long term compliance should not present any significant burdens on local governments.

17. Compare With Approaches Being Used by Federal Government

Wis. Stat. § 8.10(8) was created by 2023 WI Act 235, which is closely related to recent federal legislation protecting the information of federal judicial officers. The federal law is the Daniel Anderl Judicial Security and Privacy Act of 2021, which passed as a part of the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, 117 P.L. 263; 2022 Enacted H.R. 7776; 117 Enacted H.R. 7776; 136 Stat. 2395. It is Section 5931-39 of the legislation. The federal law aimed to prohibit the public posting of certain personal identifying information of federal judges or their immediate family members, and includes any home address of the officer. This rule relates more narrowly to residence information on declarations of candidacy and nomination papers, but is otherwise in keeping with the federal law. However, it should be noted that the state law does not apply to federal judicial officers, and only applies to Wisconsin judicial officers under the state system. The Commission has requested that the legislature amend the legislation to include federal officers.

18. Compare With Approaches Being Used by Neighboring States (Illinois, Iowa, Michigan and Minnesota)

Illinois enacted their own Judicial Privacy Act effective September 22, 2012. The Judicial Privacy Act covers Federal as well as State judges and their immediate families. Any judge in the district or circuit, appellate, or the highest court in the state is covered by the act. Bankruptcy judges are also included in the act. The act includes any blood relative of the judge or their spouses who live in the same residence as the judge. 705 ILCS § 90/1-10. The act protects information about a home address, home phone number, cellphone number, pager number, personal email address, social security number, federal tax identification number, checking and savings account numbers, credit card numbers, marital status, and the identity of a child under the age of 18. 705 ILCS § 90/1-10 Like the federal act, the Illinois act prohibits a government agency from posting this information or displaying it publicly. 705 ILCS § 90/2-1(a). If such protected information is displayed a covered individual may make a written request that the information be removed.

Iowa also has a law like the federal Judicial Security and Privacy Act. The legislature, in a 2017 amendment, added

ADMINISTRATIVE RULES

Fiscal Estimate & Economic Impact Analysis

judges into their address confidentiality program that functions to protect the identity of individuals who seek to avoid domestic abuse and their abusers. Under § 9E.2(2), active or retired state and local judges, federal judges, and the spouse or children of the judge may participate in the program. A state judge includes a supreme court justice, an appellate judge, a district court judge, magistrate judge, associate juvenile judge, associate probate judge, or a magistrate. If an individual is only temporarily serving in that role they are also included in the program. An individual must apply for the protection program. They must include identifying information like their name and address as well as why they fear for their safety or the safety of another person in their household. Iowa Code § 9E.3(1). If any of the identifying information changes the applicant must also inform the secretary of state of those changes. The act provides that program participants' name, address, and phone number are confidential information and may not be disclosed unless ordered by a court or pursuant to state or federal law. Iowa Code § 9E.7.

Minnesota has an equivalent to the Judicial Security and Privacy Act, which took effect on August 1, 2024. The act protects current, senior, and retired judges, as well as judicial referees and magistrate judges, of the state courts of Minnesota. The act also protects current and retired employees of the Minnesota judicial branch, and current employees of the Office of Administrative Hearsings, Workers' Compensation Court of Appeals, and the Tax Court. Minn. Code § 480.40(1)(b). The act protects against release the residential address of the judge, their spouse, domestic partner, or child, a personal phone number or email address, the names of their children, the name of any child care facility or school the judges children attend, however, the information can still be accessed through a federal, state, or local record request. A judicial official may also waive protection by disclosing that information themselves or to another person if they do not restrict that other person from further disclosure. Minn. Code § 480.40(1)(c), (d). The act prohibits people, businesses, associations, or government entities from knowingly posting, displaying, publishing, selling, or making available protected information. Minn. Code § 480.40(2).

It does not appear that Michigan has enacted legislation or rules on the topic of judicial officer privacy.

19. Contact Name	20. Contact Phone Number
Brandon Hunzicker, Staff Attorney	608-267-0714

This document can be made available in alternate formats to individuals with disabilities upon request.

ADMINISTRATIVE RULES
Fiscal Estimate & Economic Impact Analysis

ATTACHMENT A

-
1. Summary of Rule's Economic and Fiscal Impact on Small Businesses (Separately for each Small Business Sector, Include Implementation and Compliance Costs Expected to be Incurred)

N/A

2. Summary of the data sources used to measure the Rule's impact on Small Businesses

N/A

3. Did the agency consider the following methods to reduce the impact of the Rule on Small Businesses?

- ☐ Less Stringent Compliance or Reporting Requirements
☐ Less Stringent Schedules or Deadlines for Compliance or Reporting
☐ Consolidation or Simplification of Reporting Requirements
☐ Establishment of performance standards in lieu of Design or Operational Standards
☐ Exemption of Small Businesses from some or all requirements
☐ Other, describe:

N/A

4. Describe the methods incorporated into the Rule that will reduce its impact on Small Businesses

N/A

5. Describe the Rule's Enforcement Provisions

This rule may be enforced pursuant to an administrative complaint brought under ss. 5.06 or 5.05. This rule may be enforced through an action or proceeding to test the validity of any decision, action or failure to act on the part of any election official with respect to any matter specified in s. 5.06(1) provided that the conditions in ss. 5.06(2) and (3) are also satisfied.

6. Did the Agency prepare a Cost Benefit Analysis (if Yes, attach to form)

☐ Yes ☒ No

Notice of Submittal of Proposed Rule to Legislative Council Rules Clearinghouse

On April 18, 2025, the Wisconsin Elections Commission submitted a proposed rule to the Wisconsin Legislative Council Clearinghouse pursuant to s. 227.15 (1), Wis. Stats.

Analysis

The proposed rule would create a new chapter of administrative code, Wis. Admin Code Ch. EL 19, relating to the certification of residence and confidentiality of protected information of judicial candidates on election paperwork.

Statement of Scope

The statement of scope for this rule, SS 096-24, was approved by the Office of Wisconsin Governor Tony Evers on August 1, 2024, published in Register No. 824B, on August 26, 2024, and approved by the Wisconsin Elections Commission on September 11, 2024.

Agency Procedure for Promulgation

A public hearing is required and is scheduled to be held on May 21, 2025, at 1 p.m. on Zoom.

Materials related to the proposed rule can be found on the Commission's website at this link:
<https://elections.wi.gov/draft-rule-chapter-19-confidentiality-judicial-officer-information-certain-election-materials>

Agency Organizational Unit Primarily Responsible for Promulgating Rule

Wisconsin Elections Commission

Agency Contact Person

Angela O'Brien Sharpe – Staff Attorney
angela.sharpe@wisconsin.gov
P.O. Box 7984, Madison, WI 53703-7984
608-264-6764

Notice of Hearing

The Wisconsin Elections Commission (“the Commission”) announces that Commission staff will hold a public hearing on a permanent rule to create a new chapter of administrative code, Wis. Admin Code EL Ch. 19 relating to the certification of residence and confidentiality of protected information of judicial candidates and judicial officers on election paperwork.

Hearing Information

Date: Wednesday, May 21, 2025

Time: 1:00 p.m.

Location: *See below for virtual attendance options*

[Insert Zoom Info]

Accessibility

This meeting will include the option for captioning. Additional accessibility considerations may be available and can be requested by contacting elections@wisconsin.gov.

Appearances at the Hearing and Submittal of Written Comments

Anyone may attend the hearing and provide a perspective on the proposed rule amendments. Oral comments will be limited to a 4 minute presentation per person.

The proposed permanent rule may be reviewed at: <https://elections.wi.gov/draft-rule-chapter-19-confidentiality-judicial-officer-information-certain-election-materials>

Please send written comments to angela.sharpe@wisconsin.gov no later than 4:30 p.m. on Tuesday, May 21, 2025. Comments may also be submitted at <https://docs.legis.wisconsin.gov/code/chr/comment>, or mailed to:

Angela Sharpe
P.O. Box 7984
Madison, WI 53707-7984

Initial Regulatory Flexibility Analysis

The proposed rule will not have an effect on small businesses, as defined under s. 227.114 (1).

Notice of Possible Quorum

Wisconsin Elections Commission

Public Hearing Seeking Comment on Administrative Rule Final Rule Order
Wednesday, May 21, 2025
1:00 p.m.

A quorum of the members of the Wisconsin Elections Commission may be present at the agency's public hearing seeking comment relating to a proposed rule concerning the certification of residence and confidentiality of protected information of judicial candidates on election paperwork.

Notice is hereby given that the above gathering may constitute a meeting of the Wisconsin Elections Commission. However, no items are on an agenda for Commission consideration, nor will action be taken by the Commission.

Approved: April 17, 2025

/s/

Marge Bostelmann, Commission Secretary



Wisconsin Elections Commission

201 West Washington Avenue | Second Floor | P.O. Box 7984 | Madison, WI 53707-7984
(608) 266-8005 | elections@wi.gov | elections.wi.gov

DATE: For the April 17, 2025, Commission Meeting

TO: Commissioners, Wisconsin Elections Commission

FROM: Meagan Wolfe, Administrator
Wisconsin Elections Commission

Prepared by Elections Commission Staff

SUBJECT: Commission Staff Update

CONTENTS

General Operations

1. Elections Team Report
2. Voters Team Report
3. Data Quality & Reporting
4. Accessible Voting
5. Security

Training & Equipment

6. Clerk Training Report
7. Badger Book Report
8. Voting Technology Report

Communications

11. Public Outreach
12. Help Desk/Customer Service Report

Administration

13. Financial Services
14. Procurements
15. Agency Meetings & Presentations

Wisconsin Elections Commissioners

Ann S. Jacobs, chair | Marge Bostelmann | Don M. Millis | Carrie Riepl | Robert Spindell | Mark L. Thomsen

Administrator
Meagan Wolfe

GENERAL OPERATIONS

1. Elections

WEC staff are currently working with elections officials across the state to prepare the canvass and certification of the April 1, 2025, Spring Election. At the time of publication, WEC staff will have finished supporting clerks and voters with the Spring Election and will be shifting attention to post-election processes, such as reconciliation, canvassing, and ultimately certification of the Spring Election.

After work related to the Spring Election has been completed, staff will focus on projects ahead of the 2026 election cycle. This involves reviewing and updating existing training materials and development of elections-specific items, such as candidate checklists and clerk forms. Staff plan on bringing updates to the Commission throughout the year as projects are developed.

2. Voters

At the time this memorandum was drafted, MyVote was in the midst of an expected usage increase in the days leading to the April 1, 2025, Spring Election. MyVote traffic has been increasing since the February 18, 2025, Spring Primary.

With this increased site usage, comments directed to the Commission staff by users of the MyVote site have also increased and are currently running slightly ahead of the volume received during the same timeframe in 2024. Aside from the typical questions about registration and absentee application, we have also seen an increase in questions from voters about the status of requested absentee ballots and local in-person absentee voting options, which mirror the increase in absentee requests when compared to the 2024 Spring Election. Other spikes in comment volume have been associated with an increase in third-party text message campaigns which provide links directly to the MyVote site or redirect voters to MyVote from their own site. A side effect of these text campaigns is that voters often mistakenly believe the WEC is the entity sending the messages, and then submit comments to that effect.

3. Data Quality & Reporting

Data quality queries are run every day in the months leading up to an election, allowing Commission staff to monitor potential data entry errors or missing information in WisVote. If errors or missing information are discovered, staff then contact and work with clerks to resolve the errors within records. The data team will be adding several new queries to assist with monitoring data in 2025. This work is ongoing.

For a spring election, each municipality is required to enter election data (voter participation, registration, etc.) into the statewide voter registration system no later than 30 days after the election; this work aids jurisdictions in reconciling their voter statistics. Reminders for past elections that are not completely reconciled are sent out to municipalities on a regular basis.

Commission staff work with individual clerks to make certain all reasonable efforts are applied to ensure the accuracy of their data. Once the data has been reconciled and verified by municipalities, the data is then submitted to the U.S. Election Assistance Commission (EAC), which produces the Election Administration and Voting Statistics Report (EAVS). EAVS data is required to be submitted by every state after each General Election. The reports are posted for each state on the EAC's website eac.gov/research-and-data/studies-and-reports. Additionally, the WEC regularly publishes voting statistics (formerly EL-190 reports) that summarize the data submitted by municipal clerks. These reports are available on the WEC website at elections.wi.gov/statistics-data.

2024 Partisan Primary (as of March 24, 2025)

- 1,797 municipalities reconciled their voting statistics for all reporting units.
- 52 municipalities are outstanding to reconcile their voting statistics.

2024 General Election (as of March 24, 2025)

- 1,763 municipalities reconciled their voting statistics for all reporting units.
- 86 municipalities are outstanding to reconcile their voting statistics.

2025 Spring Primary (as of March 24, 2025)

- 1,721 municipalities reconciled their voting statistics for all reporting units.
- 128 municipalities are outstanding to reconcile their voting statistics.

Election Day Registration (EDR) Postcard Statistics are required to be reported within 90 days of an election and updated by clerks as applicable. WEC staff post this data and track compliance on the WEC website at elections.wi.gov/statistics-data/voting-statistics up to a year post-election.

ERIC

Quarter 1 (Q1) 2025 Movers mailing was sent to 39,514 voters on March 28, 2025 – no data is included, as Commission meeting materials were completed prior to mail date. Quarter 4 (Q4) 2024 Movers Mailing was sent on December 31, 2024, to a total of 18,183 voters. The Quarter 3 (Q3) 2024 Movers Mailing was sent on September 30, 2024, to a total of 38,037 voters. Data provided is current as of March 24, 2025.

Table 1: Summary of Movers Mailings 2022 to present

Year, Quarter	Total Movers	Possible Movers ¹	Registered ²	Inactive ³	Requested Continuation at current address	Rate confirm current address
2024 Q4	18,183	8987	5561	3635	44	0.2%
2024 Q3	38,037	7236	25,435	5366	574	1.5%
2024 Q2	32,884	5355	23,038	4491	675	2.1%
2024 Q1	37,593	5124	26,730	5739	670	1.8%
2023 Q4	52,333	7450	37,426	7457	838	1.6%
2023 Q3	53,416	7083	37,678	8655	760	1.4%
2023 Q2	29,721	5471	19,282	4968	480	1.6%
2023 Q1	32,551	5324	20,746	6481	448	1.4%
2022 Q4	31,187	5868	16,993	8326	293	0.9%
2022 Q3	57,555	7524	38,380	11,651	638	1.1%
2022 Q2	61,012	7614	40,798	12,600	750	1.2%
2022 Q1	55,032	7748	38,563	8721	968	1.8%

¹Movers postcard sent, no action taken by voter after receipt of postcard.

²Movers postcard sent. Voter subsequently requested continuation at their current address or updated their address. Includes voters who re-registered elsewhere in Wisconsin.

³Movers postcard sent. Postcard returned undeliverable, or voter registered out of state, or otherwise no longer active in Wisconsin.

The final files for the voter cross state participation project, in which ERIC state members who opt-in to the project exchange potential cross state matches to determine if an individual may have voted in more than one state, have been received for the 2024 General Election. There are a total of 84 records; 3 have been closed already from Illinois due to participation errors on their end. Due to the timing of the 2025 Spring Election, staff will begin outreach to clerks to obtain documentation after Election Day. Ultimately, potential matches that meet the matching criteria set by the Commission will be brought to the Commission for review in the coming months.

Badger Voters Election Data Website

The Elections Commission Badger Voters website -- <https://badgervoters.wi.gov> -- provides a simple and automated way for the public to request voter lists, absentee records, and candidates' nomination papers. Data can be sorted by election, office, county, municipality, ward, aldermanic district, and many more options. This allows the customer to receive only the data they are seeking. The voter list shows election activity back to 2006, when Wisconsin began using a statewide voter registration system, with the participation description of "at polls" or "absentee."

Absentee ballot data is available from 2016 to the present. Absentee data purchases provide customers with application and ballot activity and allow the customer the option to "subscribe" for future updates to data they received, as well as the ability to receive new files at the frequency they select, which can be twice per week, weekly, every other week, or monthly.

Customers can also make custom requests for existing data that is not included in a standard request format or for statistics that are not posted to our Elections Commission website. The customer is provided with an estimate of costs (developer time) to create and run the query and total number of records in the data set. If the customer chooses to purchase the file, our developer will then produce the file. Custom requests that take under a half-hour of developer time are only charged for the number of records requested.

Finally, customers can use Badger Voters to access nomination papers and declarations of candidacy for candidates who file those documents ahead of scheduled elections. This is particularly useful for customers who are considering bringing ballot access challenges due to the tight deadlines associated with that process.

Customer satisfaction is generally high with this program as there is no waiting time for accessing data needed, and the breadth of the data in standard files is very useful for many purposes. Most questions can be answered in our Frequently Asked questions (FAQ's) link on the Badger Voters website. This section also includes data element documents outlining what fields are included as well as sample files. The Badger Voters website often has an increase in activity during the spring and fall election cycles, but activity occurs steadily throughout the year.

The Badger Voters system provides media, campaigns, researchers, and others with quality data they can use to conduct analysis, conclude extensive research and voter outreach. Prior to the updates to Badger Voters, many of the data queries had to be run manually by WEC staff. WEC has invested in the automation of this statutorily required system. This allows the public access to data without diverting staff resources and time from other projects. This means WEC staff can spend additional time working with local election officials and voters preparing for upcoming elections while still meeting the expectations of our customers and providing transparency in election data.

Table 2: Badger Voters Revenue

Fiscal Year	Total Number of Voter Data Requests	Requested Files Purchased	Percentage of Requests Purchased	Total Revenue	Total Number of Nomination Paper Requests
FY2025	1157	1033	89.2%	\$789,949.00	408
FY2024	1067	954	85.6%	\$444,901.00	1735
FY2023	1126	998	88.6%	\$795,552.00	204
FY2022	1049	950	90.5%	\$422,970.00	1169
FY2021	368	328	89%	\$106,070.00	148
FY2020	1291	1134	88%	\$654,557.00	402
FY2019	617	473	76.6%	\$328,015.00	NA
FY2018	706	517	73.2%	\$182,341.00	NA
FY2017	643	368	57%	\$234,537.35	NA
FY2016	789	435	55%	\$235,820.00	NA
FY2015	679	418	61.56%	\$242,801.25	NA

Note: The state fiscal year begins on July 1 and ends on June 30. Prior to FY2020 the Net Revenue figure is for gross sales and does not account for any refunds.

4. Accessibility

A total of 54 polling places were reviewed at the February 18 Spring Primary, see figure 2. Unfortunately, this is just slightly over half the number expected. On the day of the Spring Primary, much of the state was under extreme cold warnings. Many school districts closed, so some reviewers were unable to work due to lack of childcare. The survey is recorded on a tablet, which tends to work slower in low temperatures, and about half of the survey questions are about outside elements, such as parking spaces, curb cuts, sidewalks, etc., so each review took longer than it would in warmer weather. Snowy and icy roads also increased the travel time between each polling place. We planned for reviewers to visit an estimated 120 polling places for the Spring Election on April 1, see figure 2.

Figure 2: Polling Places Reviewed 2/18/2025

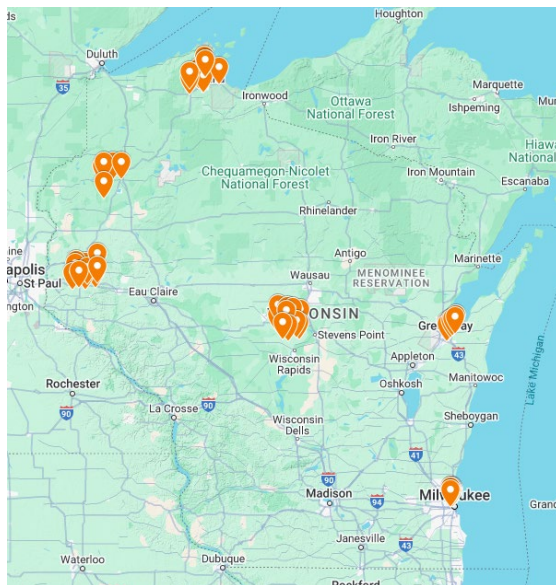
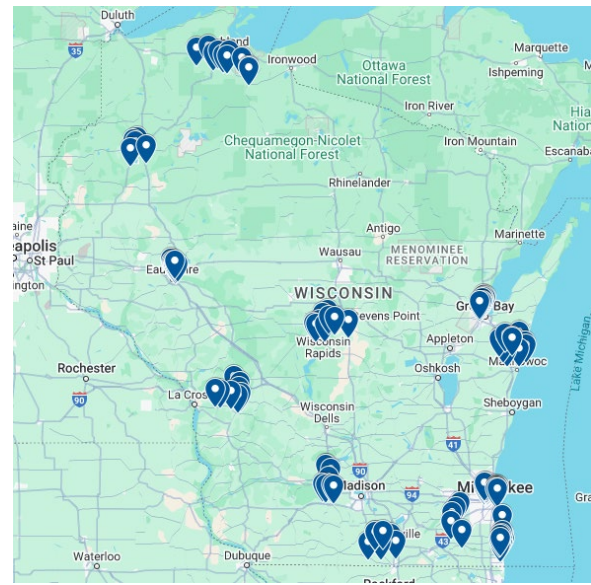


Figure 1: Polling Places Planned for 4/1/2025



Staff have received and filled 17 supply orders related to accessibility since the Spring Primary.

One accessibility concern has been reported from the Spring Primary. The voter had difficulty marking their ballot because there was not adequate lighting in the voting area. The voter also saw children accompanying a voter, and the children were wearing clothing with the name and face of a partisan candidate. According to the voter, the clerk was informed but decided to let the voter finish voting and leave with the children. Staff followed up with the clerk to ensure proper lighting would be provided at the Spring Election.

5. Security

Elections Commission IT staff put a freeze on system changes prior to the Spring Election to prevent potential disruptions, and security staff conducted heightened monitoring in conjunction with state and federal partners. Commission staff continues to coordinate threat information with partners, including maintaining a presence in a live chat with security partners during the election and regular coordination calls.

With regard to security training in 2025, the team's focus is twofold. One priority is to review the security trainings that we have available on ElectEd and make updates and/or improvements as needed. The other priority is to develop a tabletop exercise specifically tailored for Badger Book users.

Additionally, the security training team is available to speak at clerk events in 2025 on topics related to election security, in addition to speaking on such topics at the WEC clerk conference in the fall as well. The team also plans on leveraging the Badger Book tabletop exercise that is being created to develop a more general, less Badger Book focused, tabletop exercise.

TRAINING & EQUIPMENT

6. Clerk Training

What follows is a summary of certification training completion as well as election training conducted virtually by WEC staff and available to clerks and their election officials in ElectEd. WEC staff have also attended two in-person clerk events since the last Commission meeting. Finally, there is a summary of the clerk training hours for certification in the 2024-2025 cycle.

Since January 1, 2024, clerks, clerks staff and deputies, and chief inspectors have been completing certification courses online:

- Municipal Clerk Core – 337 clerks
- Baseline Chief Inspector Training – 1,131 chief inspectors*
- WisVote I (Data Entry certification) – 256 clerks and staff
- WisVote II (Clerk certification) – 147 clerks and staff

* An additional 15 CIT certification classes have been offered by WEC certified trainers around the state in this training cycle.

In an average week not near an election, around 4,000 people use ElectEd and that number ramps up to the week of an election peaking at 20,000 to 30,000 people using the system. The most accessed and completed trainings are in the poll worker series, which corresponds to them being the highest volume of users in ElectEd. Photo ID training is the one most accessed by all users. The absentee series and recordings of webinars are the trainings most frequently accessed by clerks and clerk staff.

Commission staff provided specialized election training through its webinar training series ahead of the spring primary and election:

- Pre-Election Day Preparations for Clerks
- Badger Book 2025 Spring Elections Prep
- Election Day for Clerks and Poll Workers
- What Happens After Election Day
- WEC Protected Voters & the Safe at Home Program

WEC staff presented at the Wisconsin Municipal Clerks Association District 4 meeting on March 6 in Waunakee. The three-hour session started with two hours relating to election preparations, deadlines, reminders, and processes followed by an hour discussing tips for using ElectEd, the clerks conference, and other training initiatives. Staff also met with the Wisconsin County Clerks at their WCCO conference on March 4 in Madison and discussed a variety of topics of interest to the county clerks.

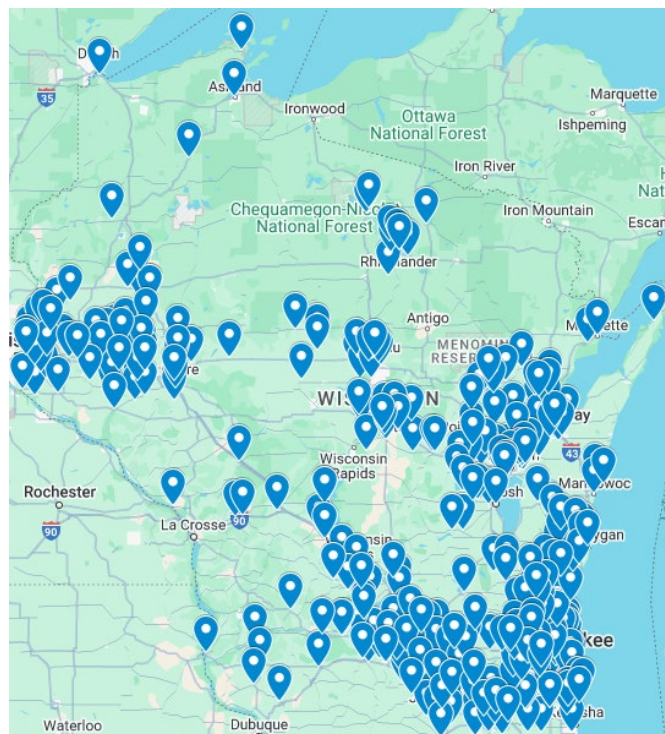
Clerks are required to report their training in ElectEd. As of March 1, 2025, 1,456 clerks logged in and 748 had at least 6 hours of training recorded for recertification. The clerk training hours report has been published monthly since January 1, 2025, and that will continue through the end of the

certification period on December 31. The reports can be viewed on the elections.wi.gov website: <https://elections.wi.gov/memo/municipal-clerk-training-report-112024-112025>.

7. Badger Book Program

Badger Books are Wisconsin's electronic poll books, developed and maintained by 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 are 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 in fall 2024. In December 2024, staff trained election officials from an additional 35 municipalities who purchased Badger Books and intend to use them in the 2025 spring elections. The map below shows the distribution of current Badger Book municipalities throughout the state.



The Badger Book training team is also planning to travel around the state in June 2025 to offer open houses for municipalities interested in learning more about Badger Books and a new tabletop exercise (TTX) for municipalities that use Badger Books. Additionally, per the Commission's decision, the training team is putting the pre-assessment for prospective buyers together and tested the proficiency exam at the most recent Intro to Badger Books training on March 10. Of the seven

groups that participated, one scored 100% and the other six received 75%, resulting in all being in good standing to begin using their machines in the election on April 1.

The Commission previously directed staff to further investigate three areas of research: hardware and support solutions from third-party vendors, internet connectivity for existing hardware, and minimum training requirements. Staff findings were presented to the Commission at its March 7, 2025, meeting.

The Commission accepted staff recommendations for the establishment of minimum training requirement. Additionally, staff were directed to develop a small-scale test program in three municipalities to assess the functionality and security of limited internet connectivity. Staff will identify potential municipalities in which to test at a future election and report to the Commission with a detailed plan. Finally, staff were directed to develop a working group of local election officials and subject matter experts to further explore third-party hardware offerings and support. Details about this working group and the next steps in this process will be presented to the Commission at its July 17, 2025, meeting.

8. Voting Technology

In the current reporting period, the voting technology team reviewed two Engineering Change Orders (ECOs) from Election Systems & Software (ES&S). ECOs are submitted by voting equipment vendors for minor changes to electronic voting systems previously certified for use in Wisconsin. These changes are first submitted to the United States Election Assistance Commission (EAC) and tested by a federally accredited Voting System Test Laboratory (VSTL) to determine the impact to the electronic voting system. If the VSTL finds the change to be *de minimis* in nature and concludes that it will not adversely affect the functionality, performance, accessibility, usability, safety, and security of the system, the EAC will approve the ECO.

The two ECOs submitted were:

- ECO 1178: This ECO introduces a replacement printer for a similar end-of-life component that will no longer be commercially available. The printer is used in conjunction with the DS950 high-speed scanner to print reports.
- ECO 1190: This ECO is for a small plastic stopper that is intended to block the output sensor tray sensor arm of the DS950 from entering the recessed area of the device. Without this stopper, the sensor arm may get stuck in the recessed area and the device may show false warnings or errors until the issue is resolved.

Following review by the WEC voting technology team, the Chair and Administrator approved the ECOs for implementation.

The voting technology team also recently submitted its final report outlining the findings of the 2024 post-election voting equipment audit to the Commission. The 2024 audit was the largest ever administered in the state of Wisconsin, with audits conducted in 373 reporting units in 336 municipalities. At its March 7, 2025, meeting, the Commission approved the findings of this audit, including the overall equipment error rate of 0.0%. These findings definitively show that the

electronic voting equipment used in Wisconsin is accurate, safe, and secure. That said, there were approximately 600 human errors identified in the administration of the audit. Staff will further review these errors to inform future guidance and training offerings.

For several years, the general practice of the voting technology team has been to only conduct certification testing of electronic voting systems in odd-numbered years. This schedule has historically lined up with vendor submissions, as the much busier election schedules of even-numbered years do not tend to offer sufficient time to conduct a full test. No vendor applications have been received at time of writing, but staff anticipate at least two will be filed later this year. Once received, staff will coordinate with the vendor to set up functional testing in the WEC office, telecommunication testing of modeming components (if the system contains these components), a public demonstration, and a meeting of the Voting Equipment Review Panel. After testing has concluded, staff will report their findings to the Commission, which will consider approval or denial of certification for the system.

COMMUNICATIONS

9. Outreach

The position of WEC Public Information Officer was posted late last month by the Department of Administration following the departure of PIO Riley Vetterkind. WEC is looking forward to bringing onboard a full-time PIO as two Limited Term Employees – one at 20 hours a week, the other in a 5-10 hours per week role – have filled in and performed additional duties. Both were assisting the full-time PIO prior to his departure and will continue to help the Communications Team under the leadership of a new PIO.

Media and voter interest in the Spring Election, particularly money flowing into the campaigns of specific candidates, created a significant increase in the number of questions and comments for the Communications Team to address.

The PIO team also assisted in the production of agency newsletters, along with social media calendars for clerks, and news releases for the media. The team provides consultation in the WEC's day-to-day internal and external communications, as well as help with writing and editing WEC documents.

10. Elections Help Desk & Customer Service

The Elections Help Desk staff support more than 2,716 active WisVote users while also answering calls and emails from the public and election officials. Staff monitor state enterprise network and data center changes and status, and process voter cancelations and voter address verification postcards. Help Desk staff have served on and assisted with various projects and development teams. Staff continue to maintain WisVote user and clerk listserv email lists and contact information and administer WEC's O365 email system. The staff continue to administer and maintain security for the WisVote Active Directory system and the Elections Learning Center, ElectEd. Help Desk staff also provide critical support to the agency's Public Records Request program and run attorney-directed searches of state electronic records.

The Help Desk staff also routinely make clerk updates when they occur to ensure accurate information in WisVote. The agency's use of Zendesk has helped improve communications to clerks and voters in a timely matter.

Table 3: Customer Service Call Volume

February 2025	1,658
March 2025 (1 st -17 th)	1,177
Total for Reporting Period	2,835

Table 4: Customer Service Email
Volume elections@wi.gov

February 2025	3,776
March 2025 (1 st -17 th)	2,249
Total for Reporting Period	6,025

Table 5: Address Verification Postcards
Mailed

February 2025	4,090
March 2025 (1 st -17 th)	8,126
Total for Reporting Period	12,216

Table 6: Voter Cancellations Received by Email

February 2025	64
March 2025 (1 st -17 th)	29
Total for Reporting Period	93

ADMINISTRATION

11. Financial Services

The WEC financial staff have performed the following financial services activities since the March 7, 2025, Staff Update to the Commission:

- Staff have continued to process the disbursement of federal Election Security grant funds through the renewed .gov municipal subgrant and the renewed Accessible Voting Equipment subgrant and follow up each disbursement with an email confirmation of expected funds and an award letter.
- Staff have been receiving and processing clerk registration fees for the fall WEC Conference, sending out notifications of payment received and invoices when requested.
- On February 27, 2025, staff reviewed and attested to the user roles in the STAR FIN and STAR HCM software systems for all staff who have access.
- On March 17, 2025, staff assigned roles under our account in the federal System for Award Management (SAMS) to select Department of Administration (DOA) staff.
- On March 28, 2025, staff submitted our Commission-approved 2025 Internal Control Plan (ICP) to the audit department of the SCO.

In addition, staff have performed the following monthly:

- Staff continued to perform and submit to the SCO scheduled month-end close queries, inquiries, and reports. Staff conducted the necessary adjusting entries to resolve any discrepancies.
- Staff continued to review and validate Wisconsin Department of Administration (DOA)'s monthly Diverse Spend Reports.
- Staff continued to review and process our agency's bi-weekly pension obligation bond allocations.
- Staff continued to participate in monthly DOA virtual user group webinars pertaining to Project Costing, Accounts Receivable and Billing, Accounts Payable, Travel and Expenses, and Asset Management.
- Staff continued to participate in the virtual PCard Administrators Group to discuss issues pertaining to the Wisconsin Purchasing Card (PCard) and in the State Agencies Purchasing Council (SAPC) to discuss procurement topics and updates.
- Staff continued to participate in the Financial Leadership Council (FLC) meetings at SCO.

12. Procurements

No Purchase Orders have been created since the March 7, 2025, Staff Update to the Commission.

13. Meetings and Presentations

WEC staff attended the following events since the last quarterly meeting of the Wisconsin Elections Commission.

March 10, 2025	Badger Book Introductory Training
March 11, 2025	Accessibility Advisory Committee Meeting
March 12, 2025	Enterprise IT Meeting
March 13, 2025	Homeland Security Council Meeting
March 18, 2025	Meeting with USPS
March 25, 2025	Election Crimes Working Group Meeting
March 26, 2025	Enterprise IT Meeting
April 2, 2025	Disability Vote Coalition Meeting State IT Director's Meeting
April 8, 2025	Badger Book Tabletop Exercise
April 9, 2025	Enterprise IT Meeting
April 14, 2025	ERIC Board of Directors Meeting