



# Wisconsin Elections Commission

212 East Washington Avenue | Third Floor | P.O. Box 7984 | Madison, WI 53707-7984  
(608) 266-8005 | elections@wi.gov | elections.wi.gov

**DATE:** For the May 20, 2020 Commission Meeting

**TO:** Members, Wisconsin Elections Commission

**FROM:** Meagan Wolfe, Administrator  
Wisconsin Elections Commission

**SUBJECT:** CARES Grant Planning

**1. Summary.** The COVID-19 pandemic crisis created a difficult and fast changing environment for elections across the country, especially here in Wisconsin where election officials and voters were faced with an election scheduled while the Safer-At-Home order was in effect. The federal Coronavirus Aid, Relief and Economic Security (CARES) Grant allows states access to funds that can be provided to municipalities to help offset the costs they will incur when conducting safe and secure elections in August and November of 2020. Grant funds must be spent for the 2020 election cycle, so time is of the essence. All of the items recommended will need to be approved and implemented in May in order to be accomplished and effective for the August and November 2020 elections.

**2. Purpose.** As authorized under Section 101 of the Help America Vote Act of 2002 (P.L. 107-252) (HAVA) and provided for in the CARES Act, 2020 (Public Law 116-136), the purpose of this award of federal funds to states is to “prevent, prepare for, and respond to coronavirus, domestically or internationally, for the 2020 Federal election cycle.”

To maximize the benefit of Wisconsin’s CARES funding, the WEC staff proposes a four-part program to offset unbudgeted expenses, enhance absentee voting, and prepare for the August and November elections. The four components of the plan are: (1) a subgrant to offset mailing expenses for Wisconsin localities; (2) a program to promote absentee voting in the general election; (3) redesigned absentee ballot envelopes to enhance usability; and (4) a program to fund sanitation supplies needed for the remainder of 2020. Each of these components is discussed in turn.

**3. Subgrant to Offset Mailing Costs.** One of the major costs we know municipalities incurred from the impact of COVID-19 was the sudden influx of absentee ballot requests to be mailed. This caused municipalities to exhaust their absentee envelope supplies and incur larger than budgeted sums of postage costs. The recommendation is to allot a portion of the CARES grant funds directly to municipalities to help offset costs incurred from the additional mail supplies required for April 2020 and provide funds to assist with the added costs heading into the next two elections. WEC staff is recommending funds be based on a \$1.10/per voter allocation in order to help offset those past and future mailing costs. Allocation of the CARES subgrant funds would be based on the number of

*Wisconsin Elections Commissioners*

Dean Knudson, chair | Marge Bostelmann | Julie M. Glancey | Ann S. Jacobs | Robert Spindell | Mark L. Thomsen

---

Administrator  
Meagan Wolfe

registered voters and expected turnout and number of by mail absentee requests in each municipality for the August and November elections.

**A. Requirements.** Under the staff recommendation, jurisdictions would not need to apply to receive their CARES grant funds for postage and mailing costs. After paying for mailing costs, leftover funds may be used to help cover additional COVID-19 resources.

Municipalities will not need to provide the Wisconsin Elections Commission with receipts or expense reports but are being asked to maintain records for potential future audits. WEC will provide training and guidance to the municipalities regarding how to document incurred postage costs and to ensure federal grant guidelines are followed.

**B. Timeline.** If approved by the Commission, checks will be mailed to municipalities by June 30 to ensure they can use the funds toward mailing absentee ballots for the August Partisan Primary.

**C. Costs.** WEC is recommending dispersing a total of \$2.6 million to municipalities to help offset the costs that will occur with the impact of additional absentee ballot mailings projected for the August and November elections. Based on turnout for past August and November elections and using current registration numbers as a guide, WEC staff used an estimated statewide total of approximately 750,000 voters will turn out in August, and approximately 3,000,000 ballots will be cast in November. These numbers may be higher than actual turnout but are consistent with recent similar elections.

The April 2020 Spring Election had a record setting rate for absentee ballots that were issued, and staff expects the numbers for the next two elections will be proportional due to COVID-19. The average issue rate for by-mail absentee ballots was 61% and staff used that as a baseline number for all municipalities for the remainder of the year. If a municipality had a higher percentage of absentees issued, that number was used. Based on that calculation, staff projects there will be an estimated 418,900 absentee ballots mailed for August and 1.95 million will be mailed for November.

Statewide Registered Voters:	Potential Postage Costs for Aug '20	Potential Postage Costs for Nov '20	Total potential postage costs for rest of 2020
3,415,026	\$460,780.28	\$2,151,260.99	\$2,612,041.27

Since Wis. Stat. § 6.87(3)(a) requires clerks to provide return postage on all mailed ballots, staff's calculations assume two stamps for each ballot mailing. Staff, therefore, recommend a reimbursement of \$1.10 per expected by mail ballot due to the postage cost for two stamps. We believe this expected cost per absentee ballot mailing is the best way to offset the expected municipal postage costs. This metric is how staff will calculate the amount of CARES funds to be distributed to each municipality.

Municipality	Aug 2016 Turnout	Nov 2016 Turnout Avg	Registered Voters May 2020	Predicted Aug 2020 Turnout	Predicted Nov 2020 Turnout	Muni Avg Apr '20 Absentee Ballots cast vs Total Votes	Projected Absentee Ballots for Aug 2020	Projected Absentee Ballots for Nov 2020
City of Appleton	14%	67%	41,187	5,583	27,529	87%	4,873	24,028
Town of Deerfield - Dane	16%	74%	1,019	163	753	82%	134	619
Village of Wheeler	7%	51%	137	10	70	61%	6	42

**4. Promoting Absentee Voting.** The overwhelming surge in absentee ballot requests for the April 7<sup>th</sup> election created many challenges for both voters and election officials. Part of the difficulties stemmed from the sudden influx of voters unfamiliar with the absentee process. In an effort to make the absentee process accessible to as many voters as possible, and to increase lead times for clerks, WEC staff studied the requirements and costs of mailing an absentee ballot request form to all registered voters in the state without an active absentee request on file in time for the November election.

**A. Requirements.** This mailing would include an explanation of how to request an absentee ballot through MyVote Wisconsin, a paper absentee ballot request form as an alternative option, and a business reply return envelope pre-addressed to the Wisconsin Election Commission. The use of business reply mail ensures that neither voters nor municipalities are responsible for postage expenses if they need to use the paper request form. It also ensures that WEC only pay for pieces that are actually mailed back to us. A small contingent of temporary staff will be hired to process returned applications. As with the postage, a central processing plan ensures that individual municipalities do not incur significant additional costs or labor. Municipalities will, however, still have to physically mail the ballots to voters who request them.

**B. Mailing Size.** Staff identified 3,396,906 total active voters in Wisconsin. After removing voters with existing absentee requests on file, and those still on the active-mover’s list, yields 2,709,942 voters currently eligible for the absentee mailing.

**C. Timeline.** As with other state agencies, the Department of Administration (DOA) has been affected by COVID-19 and is working with a reduced staff. DOA further indicated that total production time for printing and mailing would be approximately 8-12 weeks. This would be approximately 283,000-340,000 pieces per week. In addition, DOA would need a minimum 1 week for testing and development, but 2 weeks advance time would be more advantageous. This puts total project time at 11-14 weeks after DOA receives all files and approvals are received by DOA Bureau of Printing and Design (BPAD). Because these timelines do not reconcile with a June mailing, both DOA and WEC are looking at third-party vendors who may be able to complete the job on an accelerated timeline.

**D. Costs.** Total costs for the project are estimated at not more than \$2.1 million. WEC staff contacted the DOA’s Distribution and Publishing to obtain a cost estimate and timeline for the mass mailing. Final costs will vary based on final mailing specifications.

Printing	\$267,152
Supplies & Processing	\$267,909
Postage	\$1,360,000
<b>TOTAL</b>	<b>\$1,895,061</b>

Return postage via business reply mail will add to the project cost depending on response rate. Additional expenses will be incurred to hire 3-6 temporary staff to process returned applications.

**E. Data Entry Support.** While providing voters an opportunity to request their absentee ballot using a paper application by mail is an important option for voters who do not have access to or do not feel comfortable with technology, it also means manual data entry for municipal clerks. Currently, when clerks receive absentee ballot requests by mail or by email, they need to enter that data into WisVote. They also need to approve and maintain copies of photo ID's and contact the voter if there is a deficiency.

With a state-sponsored absentee request mailing, WEC staff recommends that all the absentee request forms sent back by mail be returned to the WEC office. WEC would then use CARES Act grant funds to hire temporary staff or work with a data warehouse to enter the request information as a pending request in WisVote and scan in the photo ID and application materials. The municipal clerk would then review and accept or deny the application in WisVote. The clerks would still have complete authority, as required by law, to review and accept or deny the applications. WEC would also explore ways to use this same process to help contact voters who have a deficiency in their application. If a clerk denies an application in WisVote for lack of or insufficient photo ID, WEC temporary staff could then generate a letter or email to the voter letting them know about the deficiency and asking the voter to send the missing information to their clerk to complete their request.

This proposal allows WEC to utilize two new efficiencies. First, WEC staff will be able to use the new "pending absentee" feature in WisVote where applications can be entered through MyVote for clerks to approve or deny, and to communicate the result of the application and its status to voters without manual data entry. Second, it allows WEC to more economically provide a return postage option to voters who return their absentee ballot request by mail. USPS has an option for "business reply mail" meaning that the customer is only billed for reply postage that is used. Therefore, if 3 million absentee request forms are sent, but only 20,000 voters return their request by mail, WEC will only be charged for 20,000 pieces of return mail rather than 3 million. This option for "business reply" is not available if the mail is returned to 1,850 separate municipalities.

**5. Redesigning Absentee Envelopes.** Due to the large increase in absentee voting during the Spring Election and Special Election in Congressional District 7, it is evident that more Wisconsinites will be voting absentee by mail in future elections. Accordingly, and in order to take advantage of funding made available under the CARES grant, staff has begun redesigning the envelopes and materials that voters and clerks will use in the absentee voting process.

WEC staff hopes to have an updated absentee envelope solution in place in time for pilot opportunities in the August Partisan Primary and a full implementation of the new materials for the November General Election. The redesign process has included researching how other states have modernized their vote-by-mail processes and discussions with usability experts to ensure that any redesign maximizes utility for voters and election officials.

In researching potential solutions to guide the redesign of the absentee envelopes, staff and usability experts identified four potential envelope system options:

1. A **standard envelope** similar to the one that exists currently but redesigned to promote voter usability. This is a two-envelope system in which voters receive their ballot and a return envelope in a carrier envelope.
2. An envelope with a large fold-over flap, also known as a **remittance envelope**, that would hide private information. This option maintains the two-envelope system.
3. A **three-envelope system** in which the voter receives both a return envelope and a more private certification envelope inside the carrier envelope they receive from their municipal clerk.
4. A **tearaway envelope** where a voter and witness sign and then seal the envelope. Election officials tear away a panel on the flap of the envelope, revealing the voter and witness information without opening the envelope.

After identifying potential options for envelopes, WEC staff collected feedback using a survey and feedback from a clerk work group. The standard 2-envelope system was favored in both groups due to cost, familiarity, clerk and election official time to open ballots, and being able to process certificate envelopes easily.

Staff is now creating prototypes of the new envelope using size #12 (4.75" x 11") and #14 (5" x 11.5"), the same sizes most clerks currently use. The envelope redesign includes usability-tested envelopes that would maximize the awareness of required information for voters receiving them while decreasing the number of envelopes that are returned with incomplete certificate sections. Additionally, WEC staff is working with the United States Postal Service to ensure the envelope design is compatible with postal equipment and will not interfere the voting process.

**A. Different Envelopes Types.** Colored envelopes, or envelopes with color blocks, help to differentiate between different sets of materials and different types of voters. For example, some states have set colors for their outgoing and return envelopes and a separate color to denote ballots that are sent to UOCAVA voters. This design makes the envelope easier to process by election officials and more visible during the mailing process. These colors can distinguish different types of envelopes for regular absentee voters, UOCAVA voters, and voters served by Special Voting Deputies.

At feedback sessions, clerks were split regarding whether having these different designed and colored envelopes were more convenient for them. Some preferred a universally designed envelope, while others wanted separate envelopes for voter types. WEC staff is considering the possibility of providing two different envelope options for clerks to choose from. The first option would have separate envelope designs for Regular, UOCAVA, and SVD voters, while the second option would be a universally designed option that accommodates all voter types. Clerks could then decide which envelope option works best for their municipality and voters.

At this time, staff believes that soliciting feedback from clerks and usability testing prototypes will inform the best way forward in terms of introducing different envelopes without creating additional complications in the absentee voting process.

**B. Bullet Pointed Certifications.** The certification of voter and witness in Wis. Stat. § 6.87(2) provides a long list of required language that must be on the certificate envelope. Wis. Stat. § 6.87(2) says: “The witness shall execute the following” before the certification language. The paragraph above that says the certificate “shall be in substantially the following form.” It is unclear whether the “substantially” phrase applies to the witness certification or only the voter certification. Usability sessions and clerk feedback overwhelmingly support the use of bullet-points for the certificates.

Following is the proposed language for the new envelope:

**Voter Certification:**

Statutory language:

I, ..., certify subject to the penalties of s. 12.60 (1) (b), Wis. Stats., for false statements, that I am a resident of the [... ward of the] (town) (village) of ..., or of the ... aldermanic district in the city of ..., residing at ...\* in said city, the county of ..., state of Wisconsin, and am entitled to vote in the (ward) (election district) at the election to be held on ...; that I am not voting at any other location in this election; that I am unable or unwilling to appear at the polling place in the (ward) (election district) on election day or have changed my residence within the state from one ward or election district to another later than 28 days before the election. I certify that I exhibited the enclosed ballot unmarked to the witness, that I then in (his) (her) presence and in the presence of no other person marked the ballot and enclosed and sealed the same in this envelope in such a manner that no one but myself and any person rendering assistance under s. 6.87 (5), Wis. Stats., if I requested assistance, could know how I voted.

Proposed Language:

- I am a resident of the ward of the municipality in the county of the state of Wisconsin indicated hereon.
- I am entitled to vote in the ward at the election indicated hereon.
- I am not voting at any other location in this election.
- I am unable or unwilling to appear at the polling place in the ward on election day, or I have changed my residence within the state from one ward to another later than 10 days before the election.
- I exhibited the enclosed ballot, unmarked, to the witness.
- I then in the presence of the witness and in the presence of no other person marked the ballot and enclosed and sealed the ballot in this envelope in a manner that no one but myself and any person providing assistance under Wis. Stat. § 6.87(5), if I requested assistance, could know how I voted.

**Witness Certification:**

Statutory language:

I, the undersigned witness, subject to the penalties of s. 12.60 (1) (b), Wis. Stats., for false statements, certify that I am an adult U.S. citizen\*\* and that the above statements are true and the voting procedure was executed as there stated. I am not a candidate for any office on the enclosed ballot (except in the case of an incumbent municipal clerk). I did not solicit or advise the elector to vote for or against any candidate or measure.

Proposed Language:

- I am an adult U.S. Citizen.
- The above statements are true and the voting procedure was executed as stated.
- I am not a candidate for any office on the enclosed ballot (except in the case of an incumbent municipal clerk).
- I did not solicit or advise the voter to vote for or against any candidate or measure.
- I further certify that the name and address of the voter is correct as shown.

**C. Highlighting and Type Point.** The current prototypes feature larger text. The font on the current iteration of the absentee certificate is quite small and requires voters to provide a fair amount of information in a limited space. It is staff’s opinion that, by enlarging the font, increasing the space available for the voter to input information, and more clearly indicating which information is required by using highlighting, the process of voting and returning an absentee ballot would be more intuitive and the probability of a voter returning a certificate with insufficient information would be greatly reduced.

**D. Envelope Cost.** Due to the vast increase in absentee voting by mail in 2020, many municipal supply budgets have been exhausted for the remainder of this election year. To offset these shortages, staff has explored using CARES Act funding to purchase additional absentee envelopes for each municipality.

Using the estimated turnout for August and November from above, staff estimate turn out to be roughly 3 million for November and 750,000 for August. In April 2020, almost 75% of voters voted absentee (62% by mail and 13% in-person) for a rough estimate of 2.8 million absentee ballots for the remainder of 2020. WEC staff has requested pricing from several vendors and have found vendors that would be able to fulfill the quantity needed for 2020. We would recommend a purchase of 5,600,000 envelopes (2.8 million of transmittal, 2.8 million of certificate/return). Below are the estimates for the total cost using 2.8 million requests as the basis for the estimated amount of absentee envelopes needed (please note that the cost is based on the bulk rate of 5 million so this is subject to change).

Envelope #	2-sided printing 3 colors (including black)
<b>Vendor #1</b>	
<b>#14 (transmittal)</b>	<b>\$66,472</b>
<b>#12 (return)</b>	<b>\$66,848</b>

<b>Total</b>	<b>\$133,320</b>
<b>Vendor #2</b>	
<b>#14 (transmittal)</b>	<b>\$100,884</b>
<b>#12 (return)</b>	<b>\$100,884</b>
<b>Total</b>	<b>\$201,768</b>

At this bulk rate, staff estimate the procurement and printing of 5.6 million envelopes would cost approximately \$133,320. This pricing includes incorporating black ink and two additional colors. However, this price does not include the self-adhesive for the #12 envelopes for the return so voters will not have to lick the envelope in August or November. We are working with different vendors to estimate shipping costs as well which are not included in the printing estimate. While bulk pricing provides a significant costs savings for a statewide purchase, staff is considering also smaller quantity costs when evaluating options for envelope printing to ensure the new design is cost-effective for clerks after 2020.

Cost-comparisons are being done to ensure future purchases for municipalities remain sustainable for 2021 and beyond. WEC staff are also estimating costs for municipalities that are not in large bulk orders. As the envelope sizes are the same, municipalities should not see an increase in their costs. Municipalities are not required to pay for highlighting nor self-adhesive envelopes in the future, so they can work with their printers to add extra features. Below is a chart estimating two different vendors and the envelope types listed in 1,000 quantity and 5 million quantity (prices are per 1,000 envelopes when ordering at that quantity):

<b>Envelope #</b>	<b>2-sided printing 1 color</b>	<b>2-sided printing 2 colors</b>	<b>2-sided printing 3 colors</b>	<b>2-sided printing 1 color</b>	<b>2-sided printing 2 colors</b>	<b>2-sided printing 3 colors</b>
<b>Vendor #1</b>						
	Quantity 1,000			Quantity 5 Million		
#14	1267.06	1408.24	1338.82	23.60	23.66	23.74
#12	1267.06	1408.24	1338.82	23.06	23.11	23.16
<b>Vendor #2</b>						
	Quantity 1,000			Quantity 5 Million		
#14	80.00	90.00	100.00	35.38	35.38	36.03
#12	85.00	95.00	105.00	35.60	35.60	36.03

E. **Next Steps.** Staff research on this topic has also been highly focused on creating materials that are more usable and efficient, both for voters and the election officials who will ultimately interact with them. With this in mind, the current draft prototypes being considered have been



crafted in such a way as to make it easier for voters to provide all required information while also cutting down on the likelihood of ballots being returned with insufficient certificate information or with other issues that will result in the ballot being rejected on Election Day.

Staff is soliciting clerk and voter feedback through advisory committees and usability testing in May and plans to have a final design by Friday, May 29.

Once finalized, the WEC would work with a state-contracted vendor to order 5.6 million of both the mailer and return sizes. The printing process takes approximately four weeks to complete with rollouts of finished product on a weekly basis. WEC staff is still exploring distribution options but could disperse envelopes to each county for further distribution to municipalities.

Local election officials may already have a stock of envelopes procured for the August and November 2020 elections. Staff recommends that jurisdictions use old envelope stock for in-person absentee and care facility voting for remaining elections in 2020 and in future election years. Further, WEC staff believes that because of the timing clerks could be permitted to use existing envelope stock, if they wish, for by-mail absentee for the August 2020 election. For by-mail absentees for the November 2020 election it is recommended that only new envelopes be used. This is because WEC will work with the post office on the specification of the new design to ensure Intelligent Mail Barcodes can be incorporated and that a consistent by-mail experience is available to all voters. IMB's cannot be incorporated into the current design as the specification (spacing, layout, etc.) have already been approved by USPS. Changes outside of the approved design could result in mailing issues. It is also staff's hope that videos and other voter education materials on the by-mail process can be produced with reference to the new envelope and certificate design.

**6. Funding COVID-19 Election Supplies.** The COVID-19 pandemic generated unanticipated demand for absentee ballots and an urgent need for sanitation supplies and personal protective equipment (PPE). The Department of Administration (DOA) and the State Emergency Operations Center (SEOC) ultimately helped obtain the requested supplies. The WEC then worked with SEOC and state procurement to send the supplies where needed. Wisconsin's 72 county clerks played a key role in distributing supplies to more than 2,000 polling places. Supplies that were distributed include:

- Over 2 million absentee ballot envelopes
- Over 8,000-liter bottles of liquid 70% ethyl alcohol solution that was used as a hand and surface sanitizer. The solution was sourced from a local distillery as all other state and national supply chain options were exhausted
- Over 10,000 16oz plastic spray bottles and printed labels for the bottles for the liquid alcohol solution
- 500,000 isopropyl alcohol wipes for use on voting equipment and electronic touchscreens.
- Surgical masks for poll workers
- Latex gloves for poll workers
- 1.5 million ballpoint pens so that each voter would have their own to sign the poll book and mark their ballot
- Approximately 2,000 rolls of painter's tape to facilitate social distancing
- 10,000+ social distancing and public health signs

With the benefit of time that was not available before the April 7 election, WEC staff can begin to assist jurisdictions with finding the needed supplies for the August and November statewide elections. State and local election officials will be able to better gauge the amount of supplies they may need, based on their experience in April. WEC staff is also hopeful that with additional time, there will be the opportunity to procure more traditional sanitation supplies and to provide them to the jurisdictions well in advance of the election so that they have time to incorporate the supplies fully into their election day plans and pre-election in-person voting processes.

Supplies obtained by the state for the April 2020 election totaled over \$150,000, not including envelopes. With November turn-out likely to be two or three times greater than April, it is likely that required supplies could cost upwards \$500,000. Envelope costs are broken out separately in the section above.

#### 7. Summary of CARES Act Project Costs.

<b>Project</b>	<b>Estimated Cost</b>
<b>Postage Grant Program</b>	<b>\$2,612,041</b>
<b>Absentee Mailing</b>	<b>\$2,100,000</b>
<b>Envelope Purchase and Printing</b>	<b>\$133,320</b>
<b>Sanitation Supplies</b>	<b>\$500,000</b>
<b>Total</b>	<b>\$5,345,361</b>

These totals do not include additional expenditures such as shipping and distribution of absentee envelopes and sanitation supplies and PPE and costs for data entry of returned absentee requests. Other expenditures for items such as software development and consultation, system load testing, and staff time will also account for the remaining funds. Those costs are currently unknown and would represent additional required expenditures in addition to those listed above but will likely individually fall under the \$100,000 threshold.

**Recommended Motion:** The Commission approves the recommended plan and expenditures outlined above to improve the absentee voting process and assist local election officials with costs to be funded by the CARES Act.