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December 1, 2021

To: Wisconsin Elections Commission

Re: Audit Report 21-19: Elections Administration

The Legislative Audit Bureau Report is another affirmation that the 2020 election was fair, secure and accurate. The League of Women Voters of Wisconsin welcomes this report as an opportunity to have a constructive conversation on how to improve future elections. Elections are not perfect, but we applaud the dedicated work of the WEC and clerks across the state for having record turnout with minimal issues amongst the multitude of barriers brought by the COVID-19 pandemic. Recent calls to abolish the WEC and for the WEC Administrator to resign are unfounded. The WEC has proven that it is an important partner in maintaining the integrity of elections as well as making them more accessible to voters.

The LAB report made many recommendations to improve our elections that the League would like to offer comments on. Some of the recommendations we agree with and some we do not agree with.

First is in regards to **poll worker training**. For the past 10 years, the League has been advocating for more consistency in poll worker training across the state. Given that our state is so decentralized, the quality of poll worker training varies dramatically at the municipal level. This affects the voter experience. We have seen inadequately trained poll workers wrongfully turn voters away from the poll or deny voters reasonable accommodations. And, because these poll workers are not thoroughly trained, things move less efficiently, leading to exorbitant wait times. As the LAB report points out, the Legislature and the WEC have had the opportunity to fix this by creating set standards for poll worker training, which would include guidelines for the length of required training, content of the training and more.

Based on our extensive election observation program, the League recommends that, at a minimum, the state should require that new poll workers receive consistent training prior to their first election, and train experienced poll workers at least annually--and more frequently in the case of significant changes in election law. We recommend specific training regarding the broad range of documents that can be used as proof of residence and as a photo ID for voting. Poll workers should also understand how voters can obtain an appropriate ID. Additionally, training

on accessibility, voting rights, the provisional ballot process, and finally, how to handle voters who requested but did not return absentee ballots, are all crucial areas that are necessary for comprehensive training.

Second is in regards to **Automatic Voter Registration** and its connections to the LAB's recommendations which relate to maintenance of voter registration records. The League urges the WEC, legislature and WisDOT to work together to implement Automatic Voter Registration in Wisconsin. Implementing Automatic Voter Registration will help to ensure that we have real-time address and name updates for voters. With a small update at the Department of Motor Vehicles, the WEC can ensure Wisvote records are accurate and removes some pressure on the ERIC matching process.

Third is **Ballot Curing** as it relates to LAB's absentee ballot curing process recommendations. The League would like to see a uniform approach in which clerks are allowed to correct errors in the witness address or potentially print the witness name on the certificate based on their own reliable information. Also, guidance must be in place for all clerks to monitor returned absentee ballots and notify voters of deficiencies in a timely manner so there is sufficient time for the voter to cure the deficiency.

Fourth relates to **Changes to polling locations**, specifically regarding the last minute changes and consolidation of polling locations in 2020. These changes were unprecedented and detrimental to voters. There must be a backup plan that includes - back up locations, mechanisms for notifying voters of the changes, and requirements to retain polling locations in areas reasonably close to voters' regular polling places. Municipalities cannot be allowed to consolidate so many polling places that voters have difficulty accessing those locations, and/or that unreasonably long lines ensue. This is especially a concern when a municipality drops below 75% of its typical number of polling locations.

The League would also like to comment on the LAB's recommendations related to **voter signatures**. The League does not want any action that would lead to "exact match" or other scenarios in which clerks are required to match voters' signatures. There are many reasons why a voter's signature at one point in time would not match a signature at another point in time, for example, disability, aging, stroke or use of electronic equipment. Clerks are not trained handwriting experts and this process would lead to voters being disenfranchised.

Sixth relates to polling location **Accessibility**. The LAB report unfortunately did not include information about the lack of compliance with the ADA and other laws that require polling places to be accessible. Despite the lack of attention to accessibility in the LAB report, the League urges the WEC to continue to prioritize accessibility for voters with disabilities in your work to improve our state's elections.

The seventh and final point to touch on relates to **Election Funding**. In order to have well functioning elections, they must be fully funded at all levels. We fully support the Wisconsin Elections Commission and the many elections officials around the state getting access to the necessary funding to make our elections accessible and secure.

We encourage the Commissioners to read our post election reports from the [April 2020](#) and [November 2020](#) elections to see additional context and an extended list of recommendations. (Reports are available at: <https://my.lwv.org/wisconsin/election-observation-program>). Thank you for your consideration.