

An Evaluation

Voter Registration

Elections Board

2005-2006 Joint Legislative Audit Committee Members

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CONTENTS

Letter of Transmittal	1
Report Highlights	3
Introduction	9
Mandatory Voter Registration	11
Help America Vote Act of 2002	13
Elections Board	15
Voter Registration Methods	17
Current Registration Requirements	18
Proof of Residence and Identification	19
In-Person Registration with the Clerk	19
Registration by Mail	20
Special Registration Deputies	21
Election Day Registration	22
Changing the Voter Registration Process	24
Concerns with Late Registration	24
Improving Oversight and Training for Special Registration Deputies	26
Establishing Uniform Voter Registration Requirements	29
Address Verification Cards	31
The Verification Process	31
Returned Address Verification Cards	33
District Attorney Review	36
Enhancing the Usefulness of Address Verification Cards	38
Voter Registration Lists	41
Maintaining Voter Registration Lists	41
Inactive Electors	42
Name and Address Changes	43
Ineligible Voters	45
Deceased Individuals	46
Felons Serving Sentences	47
Noncitizens	49
Voting Irregularities	50
Improving Oversight of Voter Registration Lists	51

Future Considerations	55
Municipal Clerk Training	56
City of Milwaukee Recommendations	57
Future Audits	58

Appendices

Appendix 1—Municipalities with Voter Registration Lists	
Appendix 2—State of Wisconsin Voter Registration Form	
Appendix 3—Voter Registration in States with Election Day Registration	

Response

Response from the Executive Director of the Elections Board	
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State Auditor

September 16, 2005

Senator Carol A. Roessler and
Representative Suzanne Jeskewitz, Co-chairpersons
Joint Legislative Audit Committee
State Capitol
Madison, Wisconsin 53702

Dear Senator Roessler and Representative Jeskewitz:

We have completed an evaluation of voter registration in Wisconsin, as requested by the Joint Legislative Audit Committee. Currently, voter registration is required by statute in only 172 large municipalities. Another 167 smaller municipalities choose to maintain voter registration lists. However, the federal Help America Vote Act of 2002, which requires all states to develop a computerized voter registration system, will require voter registration statewide beginning in January 2006.

We found great variation in the implementation of existing voter registration laws. For example, 46.0 percent of municipalities that responded to our survey did not send address verification cards to individuals who registered by mail or at the polls on Election Day in November 2004, although doing so is an important step in verifying the residency of voters and detecting improper registrations. Only 85.3 percent of survey respondents reported updating their voter registration lists to remove inactive voters, as required by law.

Current voter registration practices are not sufficient to ensure the accuracy of voter registration lists used by poll workers or to prevent ineligible persons from registering to vote. We identified 105 instances of voting irregularities in six municipalities, including 98 ineligible felons who may have voted. The names of these individuals have been forwarded to appropriate district attorneys for investigation.

Implementation of the statewide voter registration system may address some concerns, but we make numerous recommendations to the Elections Board to improve the voter registration process. We also present policy options for the Legislature's consideration, including establishing uniform voter registration requirements, limiting the use of outside parties to register voters, and requiring enhanced training for municipal clerks.

We appreciate the courtesy and cooperation provided to us by the municipal clerks we interviewed and surveyed, as well as by Elections Board staff. A response from the Executive Director of the Elections Board follows the appendices.

Respectfully submitted,

Janice Mueller
State Auditor

JM/JR/ss

Report Highlights ■

Voter registration requirements differ depending on how and when individuals register.

Address verification cards are not consistently used as required to verify residency or investigate improper registrations.

Current efforts to maintain accurate voter registration lists are insufficient.

Wisconsin's voter registration process will change significantly beginning January 1, 2006.

Voter registration helps to ensure that qualified electors are allowed to vote and to prevent ineligible persons from voting. In Wisconsin, it is required by statute in 172 municipalities with populations of more than 5,000, and locally in 167 smaller municipalities. Currently, 28.9 percent of the voting-age population is not required to register before voting. However, beginning in January 2006, the federal Help America Vote Act (HAVA) of 2002 and 2003 Wisconsin Act 265 will require voter registration statewide.

Individuals whose names appear on the voter registration list are presumed to meet all eligibility requirements and, in general, are neither required to provide identification or proof of residence nor to otherwise demonstrate eligibility at the polls. Following the November 2004 elections, concerns were raised about voter registration in the City of Milwaukee and elsewhere, including the use of address verification cards to confirm residency; the use of special registration deputies, who are appointed by municipal clerks to assist in registering voters; and the adequacy of processes in place for verifying voter eligibility. To address these concerns, and at the direction of the Joint Legislative Audit Committee, we evaluated:

- voter registration requirements and the methods by which voters register, including requirements in other states;
- the address verification process, including the use of address verification cards to confirm the residency of those who register by mail or at the polls;

- procedures and practices for updating voter registration lists; and
- the role of the Elections Board.

Registration Methods

To encourage voter participation, Wisconsin allows qualified electors to register in person, by mail, or with a special registration deputy before Election Day, and at the polls on Election Day. In municipalities where registration is required by statute, 20.3 percent of Wisconsin voters registered at the polls on Election Day in November 2004.

Municipal clerks rely on registrants to affirm their eligibility, including citizenship and age. However, requirements for providing identification or proof of residence vary depending on when an individual registers and by which method.

Municipal clerks may appoint special registration deputies to assist with voter registration, but they are not required to track which individuals register through special registration deputies. Some special registration deputies are municipal officials, but many work for interest groups or political parties. Problems have been identified with registrations completed by some special registration deputies, including inaccurate, illegible, and falsified registration forms.

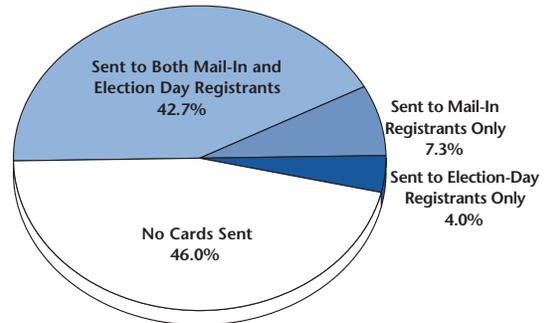
Of the 150 municipalities responding to our survey, 95 indicated they had appointed special registration deputies before the November 2004 elections. Those appointing the most were Milwaukee (2,597), Green Bay (1,500), and Madison (824).

Address Verification Cards

Address verification cards are the primary tool available to municipal clerks for verifying the residency of registered voters and detecting improper registrations by mail or at the polls. Statutes require that clerks send cards to everyone who registers by mail or on Election Day. However, as shown in Figure 1, only 42.7 percent of the 150 municipalities we surveyed sent cards to both groups, and 46.0 percent did not send any address verification cards.

Figure 1

Address Verification Cards Sent November 2004 Elections



Statutes also require clerks to provide the local district attorney with the names of any Election Day registrants whose cards are undeliverable at the address provided. However, only 24.3 percent of the clerks who sent cards also forwarded names from undeliverable cards to district attorneys. District attorneys we surveyed indicated that they require more information than is typically provided to conduct effective investigations.

Sufficient information was available to analyze undeliverable address verification cards in four municipalities: the cities of Madison, Waukesha, and Eau Claire and the Village of Ashwaubenon. These municipalities sent 45,864 address verification cards to Election Day registrants; 1,887 were returned. Most were undeliverable because voters had moved after the November 2004 elections.

Voter Registration Lists

To ensure that voter registration lists contain only the names of qualified electors, municipal clerks are required by statute to remove or inactivate the names of individuals who have not voted in four years, to update registration information for individuals who move or change their names, and to remove or inactivate the names of deceased individuals. They are also required to notify registered voters before removing their names from registration lists.

We found that statutory requirements are not consistently followed. Among our survey respondents:

- only 85.3 percent of municipalities removed the names of inactive voters from their voter registration lists;
- only 71.4 percent sometimes or always notified registered voters before removing their names; and
- only 54.0 percent reported removing the names of ineligible felons.

Because of such inconsistencies, registration lists contain duplicate records and the names of ineligible individuals. For example, when we reviewed more than 348,000 electronic voter registration records from eight municipalities, we identified 3,116 records that appear to show individuals who are registered more than once in the same municipality.

In six municipalities where sufficient information was available, we identified 105 instances of potentially improper or fraudulent voting in the November 2004 elections. These included:

- 98 ineligible felons who may have voted;
- 2 individuals who may have voted twice;
- 1 voter who may have been underage; and
- 4 absentee ballots that should not have been counted because the voters who cast them died before Election Day.

We have forwarded names to the appropriate district attorneys for investigation.

For Future Consideration

Wisconsin's voter registration process will change significantly beginning January 1, 2006, when all new registrants will be required by federal law and Wisconsin Statutes to provide their Wisconsin driver license number, a Wisconsin Department of Transportation identification card number, or the last four digits of their Social Security number, and a computerized voter registration system will be implemented statewide.

Elections Board officials believe the new computer system will improve the accuracy of voter registration lists by standardizing registration procedures, preventing duplicate registrations across municipalities, and enhancing the ability of local election officials to detect improper registrations and ineligible voters.

However, the system alone will not be sufficient if municipal clerks and other local officials do not detect and prevent common data entry errors, appropriately revise and update voter registration information, and follow uniform procedures for identifying improper registrations and ineligible voters.

We include a number of recommendations to address these concerns. In addition, the Legislature may wish to consider:

- adjusting the early registration deadline to provide clerks more time to prepare registration lists;
- establishing more stringent requirements for special registration deputies, including prohibiting compensation based on the number of individuals registered;
- establishing uniform requirements for demonstrating proof of residence for all registrants;
- providing municipal clerks with more flexibility in the use of address verification cards;
- authorizing civil penalties for local election officials and municipalities that fail to comply with elections laws; and
- implementing mandatory elections training requirements for municipal clerks.

Recommendations

Our recommendations address the need for the Elections Board to use its existing authority to:

- promulgate rules for the appointment and training of special registration deputies (*p. 28*);
- promulgate rules for the use of address verification cards (*p. 38*);
- revise the voter registration form to require disclosure of felony conviction status (*p. 48*);

- ☑ promulgate rules to minimize data entry errors, and automate processes for identifying ineligible voters (*p. 53*);
- ☑ promulgate rules to clarify the responsibilities of election officials and, if authorized by statute, specify civil penalties for noncompliance (*p. 53*); and
- ☑ provide voter registration training designed specifically for municipal clerks (*p. 57*).

In addition, we include a recommendation for the City of Milwaukee Election Commission to:

- ☑ report to the Joint Legislative Audit Committee on its implementation of recommendations from the mayor's task force for improving the election process in Milwaukee (*p. 58*).

■ ■ ■ ■

Introduction ■

Municipal clerks are responsible for registering voters in Wisconsin.

Municipal clerks in cities, villages, and towns are responsible for registering voters in Wisconsin. They also create the voter registration lists used by poll workers to verify that each individual who requests a ballot on Election Day is qualified to vote and for tracking both who has voted and the number of ballots issued. Following the November 2004 elections, concerns were raised about Wisconsin's voter registration system based on allegations of improprieties in the City of Milwaukee and questions about the use of address verification cards, the role of special registration deputies, and the adequacy of processes for verifying voter eligibility.

To address these concerns, we:

- surveyed municipal clerks in the 172 municipalities that are currently required by statute to maintain voter registration lists concerning voter registration practices, including their use of address verification cards and other processes to verify voter eligibility, special registration deputies, and training provided to local election officials;
- interviewed local government officials in nine municipalities we selected to provide a diverse sample based on population and location, and reviewed 1,887 address verification cards that were returned as undeliverable within four of these municipalities;

- interviewed officials of the Elections Board, which oversees the implementation of election and campaign finance laws, investigates complaints, and provides election administration training to local officials;
- surveyed district attorneys whose offices should have received information about undeliverable address verification cards; and
- interviewed organizations and associations that represent municipal governments in Wisconsin, as well as election officials in other states.

Our survey of municipal clerks had a response rate of 87.2 percent.

Clerks representing 33 towns, 34 villages, and 83 cities responded to our survey, for a response rate of 87.2 percent. The nine municipalities selected for additional review—the cities of Appleton, Eau Claire, Madison, Milwaukee, and Waukesha; the villages of Ashwaubenon and Plover; and the towns of Minocqua and Onalaska—are shown in Figure 2. These municipalities included 26.2 percent of Wisconsin’s voting-age population in 2004.

Figure 2

Municipalities Selected for Review



Our evaluation focused on voter registration processes and procedures in place at the time of the November 2004 elections. We did not evaluate the Elections Board's progress in implementing various federal requirements, including the statewide voter registration system required under HAVA, the federal Help America Vote Act of 2002. Moreover, our evaluation was not intended to identify problems related to canvassing election results, nor was it intended to identify specific instances of voter fraud. However, we compared names and birth dates on voter registration lists from six municipalities to vital statistics kept by the federal Social Security Administration and records of felons kept by the Department of Corrections. We were unable to determine whether ineligible felons or deceased individuals were present on the registration lists from the Town of Minocqua and the Village of Plover because birth dates were not available electronically in these municipalities.

We could not review City of Milwaukee voter registration information because of an ongoing criminal investigation.

An ongoing criminal investigation by the Milwaukee County district attorney and the U.S. Attorney for the Eastern District of Wisconsin prevented us from reviewing voter registration information for the City of Milwaukee, including its voter registration list and address verification cards for the November 2004 elections. On May 10, 2005, preliminary findings from this investigation included widespread record-keeping failures and more than 100 instances of individuals who may have voted twice, voted using false names or addresses, voted using the name of deceased individuals, or voted in Milwaukee although they were not residents. The investigation also identified 200 ineligible felons who may have voted, and it determined that the vote count for the City of Milwaukee exceeded the number of recorded voters by more than 4,500, most likely because of poor record-keeping. As of August 2005, 14 individuals had been charged with violations of election law as a result of this investigation, including 10 ineligible felons who appear to have voted and 4 individuals who may have voted twice.

Milwaukee's mayor appointed a task force after the November 2004 elections to review that city's election processes. The task force released a report in June 2005 that included specific recommendations for improving voter registration and election administration in Milwaukee. Further, the Joint Legislative Council Special Committee on Election Law Review, which convened in 2004, has been reviewing Wisconsin's election laws and is expected to complete its work in fall 2005.

Mandatory Voter Registration

In the 172 larger municipalities where voter registration is mandatory, all qualified electors except for members of a uniformed military service, are required to register in the ward or election

district where they have established residency. Municipal clerks register voters and prepare voter registration lists that poll workers use on Election Day, except in the City of Milwaukee, where a Board of Election Commissioners is responsible for voter registration. The Executive Director of the City of Milwaukee Election Commission, who is appointed by the mayor, is granted the same statutory authority and responsibilities as a municipal clerk.

Qualified electors are citizens who are at least 18 and meet residency requirements prescribed by law.

The Wisconsin Constitution and ch. 6, Wis. Stats., define “qualified electors” as persons who:

- are United States citizens;
- are at least 18 years old on the day of the election; and
- meet Wisconsin residency requirements prescribed by law.

Individuals currently serving a sentence for a felony conviction, including probation or parole, are ineligible to vote.

Individuals who otherwise meet these criteria are disqualified from voting if they:

- have been convicted of a felony and are currently serving their sentence, including probation or parole;
- have been adjudicated by a court to be incapable of understanding the objective of the election process; or
- have placed a bet or wager on the outcome of the election.

Wisconsin’s current system of voter registration is a patchwork of requirements that is confusing to municipal clerks, poll workers, and the public. Wisconsin law encourages voter participation by allowing qualified electors to register in a number of ways, including in person at the municipal clerk’s office, by mail, through special registration deputies appointed by the clerk, or at the polls on Election Day. Individuals must affirm their eligibility to vote, including citizenship, age, and residency, at the time they register. However, requirements for providing identification and proof of residence are not uniform, and procedures for maintaining voter registration lists are not consistently applied.

While 71.1 percent of Wisconsin's voting-age population was required to register in 2004, 1.2 million potential voters were not.

Furthermore, although voter registration was mandatory for 71.1 percent of the voting-age population in 2004, nearly 1.2 million individuals in 1,512 smaller municipalities were not required to register either by statute or local ordinance, as shown in Table 1. In the municipalities that do not require registration, individuals state their names and addresses to poll workers, who verify that they have not already voted at that location. Appendix 1 lists the 339 Wisconsin municipalities that currently maintain voter registration lists.

Table 1

**Voting-Age Population in Wisconsin Municipalities with Voter Registration Lists
(2004 Estimates)**

Type of Municipality	Number of Municipalities	Voting-Age Population	Percentage of Total
State-Required Voter Registration	172	2,664,214	64.7%
Locally Required Voter Registration	167	264,342	6.4
Subtotal	339	2,928,556	71.1
No Voter Registration	1,512	1,190,764	28.9
Total	1,851	4,119,320	100.0%

Help America Vote Act of 2002

HAVA requires a statewide voter registration list.

As noted, state and federal law will require voter registration in all Wisconsin municipalities beginning in January 2006. HAVA creates minimum standards for conducting federal elections that were incorporated into Wisconsin's election laws through 2003 Wisconsin Act 265, which:

- establishes a mandatory, centralized, statewide voter registration list to be maintained by the Elections Board and used by all municipalities in Wisconsin;
- requires individuals who register by mail to show identification before voting in a federal election for the first time in Wisconsin;
- requires that voting devices used at each polling place allow individuals with disabilities to vote without the need for assistance;

- directs the Elections Board to prescribe uniform standards for determining the validity of ballots cast with electronic voting systems;
- establishes standards for approving voting devices;
- directs the Elections Board, municipal clerks, and county clerks to provide information to voters through educational programs and postings at the polls;
- requires the Elections Board to develop a plan for implementing HAVA; and
- directs the Legislative Audit Bureau to conduct a program evaluation audit of state and local government implementation of HAVA and other election-related matters.

Although the general effective date of Act 265 was April 30, 2004, many provisions, including the statewide voter registration system, do not take effect until January 1, 2006.

Wisconsin received \$50.4 million in federal funds to implement HAVA.

HAVA provided each state with federal funding to improve the administration of elections for federal offices, implement a statewide voter registration system, educate voters, train election officials, replace outdated voting devices, improve the accessibility of polling places, and establish toll-free hotlines for reporting voter fraud and voting rights violations. To access these funds, each state was required to submit a plan to the new federal Election Assistance Commission. Wisconsin's initial plan was published in the Federal Register in March 2004 and approved by the Legislature's Joint Committee on Finance on April 14, 2005. Through fiscal year (FY) 2004-05, Wisconsin received \$50.4 million in federal funding to implement HAVA. These funds remain available until they are expended. The Elections Board anticipates using:

- \$25.7 million to develop and administer the statewide voter registration system;
- \$19.6 million to purchase updated and accessible voting systems for disabled persons;
- \$2.9 million for ongoing management and administrative support; and
- \$2.2 million for voter outreach and election official training.

Elections Board

The Elections Board is responsible for administering and enforcing election laws.

Although it is responsible for administering and enforcing Wisconsin's election and campaign finance laws, the Elections Board has a limited role in registering voters. The Elections Board's responsibilities related to voter registration include:

- publishing a manual that explains the election process and the duties of local election officials;
- promulgating rules for the appointment, training, and revocation of authority of special registration deputies who assist municipal clerks with voter registration;
- conducting informational meetings, training sessions, and conferences for local election officials, including certifying chief election inspectors who work at the polls;
- prescribing the necessary forms for voter registration required under state law;
- compiling information about registration and voting statistics; and
- investigating complaints related to voter registration and election law violations.

The Elections Board's voter registration responsibilities will increase with implementation of the computerized statewide voter registration system that is required by HAVA and is being designed under contract with a private vendor. Elections Board officials indicate that they intend to begin training municipal clerks and other election officials on the new system, which will incorporate existing municipal voter registration records, in fall 2005.

The Elections Board has 17 federally funded staff to implement HAVA.

As shown in Table 2, the Elections Board is currently staffed by 11 full-time equivalent (FTE) employees whose positions are funded with general purpose revenue, and by 17 project employees whose positions are federally funded. Federally funded staff are responsible for implementing HAVA, and the majority work on the statewide voter registration system. The federally funded positions are scheduled to begin expiring in June 2006, with the last to expire in January 2009.

Table 2

Elections Board Staff
June 2005

Area of Responsibility	State-Funded FTE Positions	Federally Funded Project Positions	Total
Executive and Administrative	4	0	4
Campaign Finance	4	0	4
Elections Administration	2	4	6
Statewide Voter Registration Project	1	13	14
Total	11	17	28

Elections Board expenditures were approximately \$4.7 million in FY 2004-05.

As shown in Table 3, Elections Board expenditures almost tripled from FY 2000-01 through FY 2004-05. The increase primarily reflects spending related to HAVA, including \$1.2 million in professional services contracts and \$1.5 million in supplies and services to purchase computer equipment and software related to the statewide voter registration system. The Elections Board anticipates spending the remaining federal funds during the 2005-07 biennium to implement HAVA-related requirements.

Table 3

Elections Board Expenditures

Category	FY 2000-01	FY 2001-02	FY 2002-03	FY 2003-04	FY 2004-05
Salary and Fringe Benefits	\$ 772,400	\$ 756,300	\$ 776,100	\$ 801,900	\$1,111,900
Supplies and Services	191,400	137,800	147,700	181,500	1,934,600
Professional Services	218,400	89,500	234,100	495,700	1,229,600
Election Campaign Fund ¹	462,500	3,900	595,100	10,700	327,400
Travel and Training	21,100	17,600	31,000	42,700	62,900
Total	\$1,665,800	\$1,005,100	\$1,784,000	\$1,532,500	\$4,666,400

¹ The Election Campaign Fund provides public financing for campaigns for legislative and statewide offices and is funded by a voluntary \$1 check-off on the Wisconsin individual income tax form.

Voter Registration Methods ■

Chapter 6, Wis. Stats., provides four methods of voter registration: in person at the municipal clerk's office, by mail, with a special registration deputy appointed by the municipal clerk, or at the polls on Election Day. Although all registrants are required to complete a registration form, requirements for providing identification or proof of residence vary depending on when an individual registers and the registration method. For example:

- an individual who registers with a municipal clerk more than 13 days before an election is not required to provide either identification or proof of residence; however, proof of residence is required for those registering with a clerk within 13 days of an election;
- an individual who registers by mail at any time is required to provide identification before voting in a federal election for the first time in Wisconsin;
- an individual who registers with a special registration deputy more than 13 days before an election is not required to provide either identification or proof of residence; and
- an individual who registers at the polls on Election Day is required to provide proof of residence.

These differences are confusing to municipal clerks, poll workers, and the public. In addition, municipal officials have expressed concerns with the statutory deadline for registration and the use and training of special registration deputies. To improve the accuracy and completeness of voter registration lists, we provide a number of options for the Legislature to consider, including adjusting the early registration deadline, increasing the oversight and training of special registration deputies, and establishing uniform requirements for providing proof of residence.

Current Registration Requirements

Registrants must certify that they are eligible to vote.

Individuals registering to vote may use either a form designed specifically for their municipality or the state voter registration form available from the Elections Board, which is shown in Appendix 2. Regardless of the form used, s. 6.33, Wis. Stats., requires each registrant to provide his or her name, address of residence, and date of birth. Registrants must also indicate whether they are currently registered to vote at another location and affirm that they are United States citizens and will be at least 18 years old on Election Day. Finally, they must certify with their signature that they meet all other eligibility requirements and that all information provided is true under penalty of perjury.

The statutory registration deadline is 5 p.m. on the second Wednesday preceding an election.

Before Election Day, qualified electors may register in person, by mail, or with a special registration deputy who is appointed by a municipal clerk. They may also register at the polls on Election Day. Wisconsin is one of six states that allow Election Day registration. The other five are Idaho, Maine, Minnesota, New Hampshire, and Wyoming. Section 6.28, Wis. Stats., establishes an early registration deadline—5 p.m. on the second Wednesday preceding an election—to give municipal clerks time to prepare a list of registered voters, verify the eligibility of individuals on the list, and manage other pre-election duties. As noted, individuals whose names appear on the registration list are presumed to meet all eligibility requirements and, in general, are neither required to provide identification or proof of residence nor to otherwise demonstrate eligibility on Election Day.

Qualified electors may continue to register after the statutory deadline if the clerk can add their names to the list.

Municipal clerks may continue to accept both in-person and mailed registration forms after the statutory registration deadline (that is, within 13 days of an election) if they determine that the registration list can be revised in time for the election. When revision is no longer feasible, municipal clerks are required to issue certificates to individuals registering in person that list the name and address of the prospective voter and inform poll workers that the bearer is properly registered and should be allowed to vote. Instead of

issuing certificates to late registrants, the City of Milwaukee requires that they vote by absentee ballot at the time of registration. Absentee ballots submitted in this fashion are sent to the appropriate polling locations to be counted with other absentee ballots on Election Day.

Proof of Residence and Identification

As shown in Table 4, Wisconsin’s requirements for providing identification or proof of residence differ depending on both how and when individuals register to vote.

Table 4

Proof of Residence or Identification Required to Register

Method of Registration	More than 13 Days Before the Election	Within 13 Days of the Election
In Person with Clerk	None	Proof of Residence
Mail-In Form ¹	Identification	Identification
Special Registration Deputy	None	Not Applicable
Election Day	Not Applicable	Proof of Residence

¹ Mail-in registrants are required to provide federally mandated identification before voting in a federal election for the first time in Wisconsin.

In-Person Registration with the Clerk

Early registrants at the municipal clerk’s office are not required to provide identification or proof of residence.

Individuals who register in person at the municipal clerk’s office before the statutory registration deadline are required to complete a registration form but are not required to provide identification or proof of residence. Similarly, registered voters who have changed their names or moved within the same municipality may appear in person before the municipal clerk and provide their new name or address. Because neither identification nor proof of residence is required, municipal clerks rely upon early registrants to truthfully report information on the registration form and to affirm they are qualified electors at the time they register. However, one of the municipal clerks we interviewed requests all in-person registrants to provide proof of residence at the time they register.

Individuals who register in person with the clerk within 13 days of an election must provide proof of residence.

In contrast, individuals who register at the municipal clerk's office within 13 days of an election must provide proof of residence or have their eligibility corroborated in a signed statement by another qualified elector of the municipality. As required by s. 6.55(7)(a), Wis. Stats., the document used as proof of residence must include the individual's current and complete name and residential address. However, if a qualified elector's address has changed since the identifying document was issued, s. 6.55(7)(b), Wis. Stats., allows the individual to type or hand-print a correction on the document. Section 6.55(7)(c), Wis. Stats., lists examples of documents that can be used as proof of residence, which include:

- a Wisconsin driver license or another official identification card or license issued by a Wisconsin governmental unit, or by an employer in the normal course of business;
- a credit card or library card;
- a check-cashing or courtesy card issued by a merchant in the normal course of business;
- a real estate tax bill or receipt for the current year or the year preceding the date of the election;
- a residential lease that is effective for the period that includes Election Day;
- a university, college, or technical institute identification or fee card;
- an airplane pilot's license; or
- a gas, electric, or telephone service statement for the period beginning 90 days or less from Election Day.

Registration by Mail

HAVA requires individuals who register by mail to provide identification before they vote in any state for the first time.

As shown in Appendix 3, all six of the states that allow Election Day registration also allow qualified electors to register by mail. Wisconsin law does not require individuals who register by mail before the statutory registration deadline to provide proof of residence, unless the clerk has reliable information indicating a person is not qualified. However, since January 2003, HAVA has required individuals who register by mail and have not previously voted in a federal election in Wisconsin to provide identification before voting. Under HAVA, acceptable forms of identification include:

- a current and valid photo identification, such as a driver license; or
- a utility bill, bank statement, government check, paycheck, or government document that contains the name and address of the voter.

The federally required identification may be submitted along with the mail-in registration form, or it may be presented either to the municipal clerk before Election Day or to the poll worker on Election Day. Individuals who submit registration forms by mail and are unable to provide the required identification at the polling place may cast a provisional ballot under s. 6.97, Wis. Stats., which complies with a federal requirement to allow provisional ballots. Provisional ballots are not included in the official vote tally unless the municipal clerk is able to determine, by 4 p.m. the next day, that the individuals who cast them are qualified electors. For the November 2004 elections, 376 provisional ballots were cast, but only 120 were counted statewide.

Some municipal clerks experienced heavy workloads before the November 2004 elections, when they received many registration forms by mail as a result of voter registration drives. Municipal clerks did not typically track the number of mail-in registrations they received. However, all of the municipal clerks we interviewed reported noting whether or not each registrant provided the federally required identification. Registrants who failed to provide identification were notified by mail that they would be required to do so at the polls, and clerks indicated that they made notes on their registration lists so that poll workers knew these individuals were required to provide identification before voting.

Special Registration Deputies

Municipal clerks may appoint special registration deputies to assist with registering voters.

To reduce the burden on municipal clerks and provide additional opportunities for registration, s. 6.28, Wis. Stats., requires that voter registration be offered both at register of deeds offices and at public high schools. In addition, municipal clerks may appoint special registration deputies who are authorized to register qualified electors at other locations. Beginning in 2006, the Elections Board is also authorized to appoint special registration deputies to assist municipal clerks. The other states that allow Election Day registration, with the exception of Wyoming, allow the appointment of election officials similar to special registration deputies.

Special registration deputies must be qualified electors in Wisconsin, and they are required to take an oath. They must be deputized by the clerk of each municipality in which they wish to register voters. In practice, clerks appoint three types of special registration deputies:

- individuals who are appointed for an indeterminate amount of time, such as high school employees;
- individuals who are appointed for a specific term, such as those working for voter registration drives immediately before an election; and
- individuals who are appointed to register voters only on Election Day at the polls.

Special registration deputies are considered local election officials acting on behalf of the municipal clerk, and they must follow the same registration requirements municipal clerks do. Accordingly, they are not required to obtain identification or proof of residence from qualified electors before the registration deadline.

Except when they have been appointed to work at polling locations, special registration deputies are not allowed to register voters within 13 days of an election. However, in some municipalities registration forms completed by special registration deputies after the statutory registration deadline are treated as mail-in registrations, and these registrants are required to provide the same documentation required for other mail-in registrants. In addition, individuals who have not been appointed as special registration deputies may independently distribute and collect voter registration forms, which are also treated as mail-in registrations. Special registration deputies who are authorized to register voters at the polls are required to follow the procedures for Election Day registration.

Election Day Registration

Individuals registering at polling places on Election Day must provide proof of residence.

Individuals who register at the polls on Election Day must complete a voter registration form and provide proof of residence using the same documents required of those who register within 13 days of an election. Alternatively, residency may be corroborated in a signed statement by another qualified elector of the municipality. The names of voters who register at their polling place on Election Day are tracked in a separate, supplemental registration list.

Nearly one-quarter of survey respondents did not properly record proof of residence for Election Day registrants.

Poll workers, including those appointed as special registration deputies, are responsible for processing Election Day registrations. As required by s. 6.79(4), Wis. Stats., they must note the type of document provided as proof of residence and record any unique identification number found on that document. However, 33 of the 150 municipalities responding to our survey did not follow this requirement. Such failure limits clerks’ ability to verify after the election that the information provided on registration forms is accurate.

One-fifth of Wisconsin voters in the November 2004 elections registered to vote on Election Day.

Wisconsin has a long-standing tradition of encouraging voter participation by allowing qualified electors to register at the polls on Election Day. For the November 2004 elections, the Census Bureau estimated voter turnout in Wisconsin at 76.6 percent of eligible voters, second only to Minnesota (79.2 percent), and above the national average of 63.8 percent. In the 172 municipalities where voter registration is required by statute, 20.3 percent of voters in the November 2004 elections registered on Election Day. As shown in Table 5, this is a smaller percentage, but a larger number, than for the November 2000 elections.

Table 5

Election-Day Registration
(Municipalities with State-Required Voter Registration Lists)

Election	Number of Municipalities	Individuals Registering on Election Day	All Registered Voters ¹	Individuals Voting	Percentage of Voters Registering on Election Day
November 2000	171	379,926	2,459,007	1,683,861	22.6%
November 2004	172	390,789	2,702,378	1,925,373	20.3

¹ Includes individuals who registered before the deadline, registered late, and registered on Election Day.

Source: Elections Board

In interviews and surveys, municipal clerks have noted that Election Day registration poses challenges for verifying voter eligibility because it is difficult to independently validate information provided by registrants—such as their age, address, or felony conviction status—before allowing them to vote. However, unlike those who register in person with the clerk or through special registration deputies before the statutory registration deadline, all

individuals registering on Election Day must provide proof of residence or have their residency corroborated in a signed statement by another qualified elector.

Changing the Voter Registration Process

Driver license or Social Security numbers will be required for all registrants beginning in January 2006.

Voter registration in Wisconsin will change significantly beginning January 1, 2006, as a result of changes mandated by HAVA. Specifically, s. 6.33(1), Wis. Stats., will require all new registrants to provide their Wisconsin driver license number, a Wisconsin Department of Transportation identification card number, or the last four digits of their Social Security number. In anticipation of this change, the Elections Board has already modified its voter registration form to request this information, which will assist municipal clerks in verifying voter identity and eligibility. The Legislature may wish to consider additional changes to the voter registration process to address other concerns raised by local election officials and ensure consistent requirements statewide, such as:

- adjusting the statutory registration deadline so that clerks have sufficient time both for verification and to ensure that all qualified electors who have registered are included in the voter registration lists distributed to the polls;
- increasing the oversight and training of special registration deputies, who may be short-term appointees working for voter registration drives or individuals who are appointed only to register voters at the polls on Election Day; and
- establishing uniform requirements for all registrants that reduce confusion without discouraging qualified electors from voting.

Concerns with Late Registration

More than 54,000 individuals registered after the statutory deadline for the November 2004 elections.

As shown in Table 6, in the 172 municipalities where voter registration is required by statute, more than 54,000 individuals registered within 13 days of the November 2004 elections. The increase compared to the November 2000 elections is likely attributable to pre-election voter registration drives.

Table 6

Late Registration
(Municipalities with State-Required Voter Registration Lists)

Election	Number of Municipalities	Individuals Registered Before the Deadline	Individuals Registered After the Deadline	All Registered Voters Before Election Day	Percentage of Individuals Registered After the Deadline
November 2000	171	2,050,462	28,619	2,079,081	1.4%
November 2004	172	2,257,404	54,185	2,311,589	2.3

Source: Elections Board

Municipal officials expressed concerns with allowing individuals to register after the statutory deadline, because adding names to their registration lists in time to make them publicly available and distribute them to the polling places can be difficult. Late registration is particularly burdensome for the City of Milwaukee because s. 6.48(2), Wis. Stats., requires the City Election Commission to hold a public meeting on the Wednesday immediately before each election to hear objections regarding any individuals on the registration list. Milwaukee election officials reported that it was difficult to meet this deadline while continuing to process late registrations.

Closing registration more than 13 days before the election would allow municipal clerks more time to prepare the voter registration list.

The Legislature may wish to consider options to reduce municipal clerks' workload generated by late registrations. For example, some of the clerks we surveyed believe that the statutory deadline should be moved forward to allow them more time to prepare the registration list, verify the eligibility of individuals on the list, and manage other pre-election duties. Closing registration sooner is consistent with the practices of several other states that allow Election Day registration. For example, the registration deadline is 21 days before an election in Minnesota, and 30 days before an election in Wyoming.

Maine is the only other state with Election Day registration that also allows late registration.

Another option is to eliminate late registration, which would allow municipal clerks additional time to verify that everyone on the registration list is a qualified elector without having to continuously add late registrants. Maine is the only other state with Election Day registration that also allows late registration; Idaho, Minnesota, New Hampshire, and Wyoming require individuals who miss the deadline to register at the polls. The elimination of late registration may inconvenience some individuals who wish to register at their municipal clerk's office after the statutory registration deadline, but

these individuals could still register at their polling place on Election Day. This change would likely increase registration at the polls and therefore, result in additional work for poll workers. Furthermore, additional Election Day registrations are likely to be unpopular with some municipal clerks. Of the 150 municipal clerks responding to our survey, 22 indicated a desire to eliminate Election Day registration because of their concerns with delays and confusion at the polls.

Improving Oversight and Training for Special Registration Deputies

Of the 150 municipalities responding to our survey, 114 provided information about the number of special registration deputies they appointed before the November 2004 elections. As shown in Table 7, most municipalities appointed 100 or fewer special registration deputies, including 19 that did not appoint any deputies for the November 2004 elections. However, 6 municipalities appointed more than 100 special registration deputies for the November 2004 elections. The three municipalities appointing the most were the cities of Milwaukee (2,597), Green Bay (1,500), and Madison (824).

Table 7

Special Registration Deputies November 2004 Elections

Number of Deputies Appointed	Municipalities Reporting	Percentage Reporting
None	19	16.7%
1 to 10	57	50.0
11 to 50	24	21.0
51 to 100	8	7.0
More than 100	6	5.3
Total	114	100.0%

Seven of the 2,597 special registration deputies appointed in Milwaukee were not Wisconsin residents.

Some of the special registration deputies appointed for the November 2004 elections were municipal officials, but many worked for special interest groups or political parties interested in increasing voter turnout. We reviewed lists of individuals appointed to serve as special registration deputies in the cities of Madison and Milwaukee and found that 7 of the 2,597 individuals who were appointed in

Milwaukee were not residents of Wisconsin, despite the requirement that only individuals qualified to vote in Wisconsin be appointed. Milwaukee election officials stated that the appointment of these individuals was an error, and Election Commission staff have been informed that only individuals eligible to vote in Wisconsin may be appointed in the future.

Some of the municipal clerks we interviewed are concerned that improper or inaccurate registrations could be added to voter registration lists because special registration deputies are not required to request identification or proof of residence from individuals who register before the statutory deadline. Other investigators in Milwaukee have found that special registration deputies submitted 65 falsified names for the November 2004 elections, and the district attorneys in Milwaukee and Racine counties have charged four individuals with submitting fraudulent registration forms while serving as special registration deputies during the November 2004 elections. These special registration deputies were reportedly paid by their employer on a per registrant basis, which may have encouraged them to submit fraudulent registration forms to increase their compensation.

Most municipal clerks do not track which individuals have registered through special registration deputies.

Although no other municipal clerks reported to us that special registration deputies had submitted improper names before the November 2004 elections, we note that most municipal clerks do not track which individuals have registered through special registration deputies. Despite the fact that the registration form must be signed by the special registration deputy helping to complete it, only one of the nine municipalities we selected for detailed review recorded this information in its computerized registration list. Tracking this information could assist clerks in identifying patterns of duplicate, inaccurate, or fraudulent voter registrations submitted by particular special registration deputies.

Nineteen of the municipalities responding to our survey indicated a desire to eliminate or reform the special registration deputy system, and the municipal clerks with whom we spoke identified several other concerns, including:

- special registration deputies submitting voter registration forms to the wrong municipality, such as to the City of Appleton for residents of surrounding municipalities;
- special registration deputies submitting large batches of voter registration forms within 13 days of an election, which results in additional work to obtain the necessary identification required of mail-in registrations; and

- special registration deputies submitting duplicate registration forms for the same person or for individuals who were already registered, which results in additional work to identify and remove duplicate registrations.

Some of the concerns with special registration deputies—such as submitting inaccurate or duplicate registration forms or submitting registration forms to the wrong municipality—may have been avoided if these individuals had received better instruction. Representatives of all nine of the municipalities we interviewed stated that they provide special registration deputies with either verbal or written instructions explaining their responsibilities and duties. However, such training is provided at the discretion of each clerk, and we were unable to determine whether all special registration deputies received instruction because clerks are not required to track this information.

The Elections Board has not promulgated rules for training and appointing special registration deputies.

Section 6.26(3), Wis. Stats., requires the Elections Board to develop rules for appointing, training, and revoking the appointments of special registration deputies. Although this requirement took effect in 1988 as part of 1987 Wisconsin Act 391, the Elections Board has not promulgated these rules.

Recommendation

We recommend the Elections Board promulgate administrative rules, as required by s. 6.26(3), Wis. Stats., that:

- *specify procedures for appointing and revoking the appointments of special registration deputies; and*
- *establish training requirements and procedures to verify that all special registration deputies are properly instructed.*

Alternatively, given the concerns with special registration deputies, the Legislature may wish to limit these appointments to individuals who are county officials, municipal officials, high school employees, or other qualified individuals who have received appropriate training. Independent groups interested in increasing voter participation could still encourage registration by distributing mail-in registration forms to qualified electors.

Additionally, the Legislature may wish to consider changes to reduce the likelihood that special registration deputies submit duplicate, inaccurate, or improper registration forms, including:

- prohibiting special registration deputies from being compensated based on the number of registration forms they submit;
- requiring municipal clerks to track the registration forms submitted by each special registration deputy; and
- requiring municipal clerks to maintain and make publicly available a list of individuals appointed to serve as special registration deputies, including names, addresses, and employers or affiliations.

Establishing Uniform Voter Registration Requirements

As noted, Wisconsin's requirements for providing identification or proof of residence differ depending on how an individual registers to vote. Further, some documents that are acceptable as proof of residence under Wisconsin law differ from those that are acceptable as identification for mail-in registrants under federal law. In some cases, the types of documents specified in statute are inconsistent with the requirement that documents used as proof of residence contain a current name and address. For example, credit cards and library cards, which are allowable under s. 6.55(7)(c), Wis. Stats., do not typically contain a residential address.

Maine, New Hampshire, and Wyoming require proof of residence for everyone registering to vote.

Proof-of-residence requirements, including the documents that are acceptable as proof, differ among other states that allow Election Day registration. Like Wisconsin, Idaho and Minnesota do not require individuals who register in person before the registration deadline to show proof of residence or other identification. In contrast, Maine, New Hampshire, and Wyoming require all registrants, regardless of whether they are registering in person or by mail, to provide proof of residence. Both general and Election Day requirements in all six states are shown in Appendix 3.

Uniform proof-of-residence requirements could reduce confusion among voters and improve the accuracy of voter registration lists.

Municipal clerks must track whether the appropriate documents have been submitted with voter registration forms for some registrants, but not others. In addition, the ability of clerks to verify that individuals registering to vote are, in fact, qualified electors may be limited in instances where proof of residence is not required. In order to reduce confusion, improve the accuracy of voter registration lists, and limit opportunities for ineligible persons to register to vote, the Legislature may wish to consider establishing uniform proof-of-residence requirements. However, any changes would need to be considered carefully to avoid creating barriers to voting that could discourage participation.

In addition, the Legislature may wish to consider other changes to improve the voter registration process, including:

- clarifying the requirement in s. 6.36(1), Wis. Stats., that municipal clerks track the method by which an individual registers to vote, such as in person in the clerk’s office, by mail, or through a special registration deputy, to help ensure that the appropriate proof of residence is provided, if required;
- repealing s. 6.55(7)(b), Wis. Stats., which allows individuals registering to vote to type or hand-print address corrections on documents that are used as proof of residence, because this provision conflicts with the purpose of requiring third-party verification; and
- amending s. 6.55(7)(c), Wis. Stats., so that the list of documents allowable under state law is more clearly defined and is consistent with documents that are acceptable under federal law.

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Address Verification Cards ■

Address verification cards are the clerks' primary tool for verifying residency.

Address verification cards are the primary tool available to municipal clerks for verifying the residency of registered voters and detecting improper registrations by mail or at the polls. In some communities, the cards are also used to notify voters of their polling location. Chapter 6, Wis. Stats., requires municipal clerks to send address verification cards to individuals who register by mail or at the polls and to provide the local district attorney with the names of any Election Day registrants whose cards are undeliverable at the address provided. However, nearly one-half of the municipal clerks responding to our survey did not send address verification cards for the November 2004 elections, and fewer than one-quarter of those who sent cards to Election Day registrants reported that they notified the district attorney if cards were undeliverable. District attorneys have suggested that additional information is needed to investigate improper or illegal voting by individuals whose cards are returned.

The Verification Process

Current law requires municipal clerks to send an address verification card to the address provided on a registration form submitted by mail or at the polls on Election Day. Wisconsin law does not require address verification cards for individuals who register in person at the municipal clerk's office or through special registration deputies.

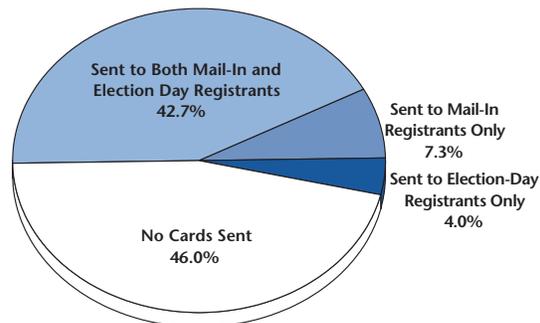
Address verification cards are sent either as post cards or as letters by first class mail, with return service requested. If the addressee has moved, or if the address does not exist or is incomplete, the United States Postal Service is required to return the card to the municipal clerk, usually along with an endorsement stating why the card was not delivered. By statute, the clerk must then remove the name from the voter registration list and, if the individual registered at the polls on Election Day, forward the name to the district attorney for investigation. If cards for individuals who registered by mail are undeliverable, there is no statutory requirement to inform the local district attorney.

Only 42.7 percent of clerks surveyed sent address verification cards to both Election Day and mail-in registrants, as required by law.

As shown in Figure 3, only 42.7 percent of municipal clerks we surveyed complied with existing law and sent address verification cards to both mail-in and Election Day registrants for the November 2004 elections. A larger percentage—46.0 percent—did not send any address verification cards. Another 4.0 percent sent address verification cards only to Election Day registrants, and 7.3 percent sent cards only to mail-in registrants.

Figure 3

Address Verification Cards Sent
November 2004 Elections



Some clerks were unaware of the requirement to send cards to Election Day registrants.

Among the municipalities that sent address verification cards, municipal clerks reported using the cards inconsistently. For example:

- in 12 municipalities, cards were not mailed when individuals changed addresses within the same municipality;

- in 11 municipalities, cards were not mailed when individuals changed their names;
- in 3 municipalities, clerks were unaware of the requirement to mail address verification cards to Election Day registrants; and
- in 2 municipalities, cards were not sent to individuals whose addresses could be verified using other sources of information, such as tax records or utility bills.

Returned Address Verification Cards

Undeliverable cards were available from four of the nine municipalities selected for review.

We attempted to determine why address verification cards sent to individuals who registered at the polls for the November 2004 elections were undeliverable. However, undeliverable cards were available from only four of the nine municipalities we selected for detailed review: the Village of Ashwaubenon and the cities of Eau Claire, Madison, and Waukesha. The towns of Minocqua and Onalaska and the Village of Plover did not send address verification cards for the November 2004 elections, and the City of Appleton filed its returned cards in a manner that did not allow us to distinguish the 2004 cards from those returned after subsequent elections. As noted, address verification cards were not available in the City of Milwaukee because of an ongoing investigation. None of the municipal clerks we interviewed tracked the number of cards returned for mail-in registrants.

We reviewed 1,887 returned address verification cards.

As shown in Table 8, we reviewed 1,887 address verification cards that were returned as undeliverable. The number of undeliverable cards ranged from 18 in the Village of Ashwaubenon to 1,295 in the City of Madison. On average, in these four municipalities, 4.1 percent of the cards were returned.

Table 8

Undeliverable Address Verification Cards for Election Day Registrants
November 2004 Elections

Municipality	Cards Sent	Undeliverable Cards	Percentage of Cards Returned
City of Madison ¹	31,261	1,295	4.1%
City of Waukesha	6,600	323	4.9
City of Eau Claire	6,299	251	4.0
Village of Ashwaubenon	1,704	18	1.1
Total	45,864	1,887	4.1%

¹ The City of Madison was the only municipality we reviewed that sent cards to individuals who were registered but changed their names or addresses at the polls. The other municipalities did not send cards in these instances.

Most address verification cards are returned because voters move after an election.

As shown in Table 9, 62.5 percent of address verification cards we reviewed were returned because the registrant had moved after the November 2004 elections and left a forwarding address, but postal regulations prohibit mail for which return service is requested from being forwarded. An additional 32.3 percent of the verification cards were undeliverable as addressed because the registrant moved and left no forwarding address, the forwarding address had expired, or the postal worker did not know whether the individual was living at the address provided. Another 47 verification cards were not delivered because the address was incorrect or incomplete, including 36 cards addressed with the wrong street number, 2 with an incorrect street name, and 9 with a missing apartment number or otherwise insufficient address. We identified 51 cards that were returned for other reasons, including:

- 19 that were sent to individuals who were temporarily away;
- 9 that were sent to an address with no mail box;
- 7 that were returned for no identified reason;
- 3 that were unclaimed;
- 2 that were sent to vacant addresses; and
- 11 that were returned for some other reason.

Table 9

Number of Undeliverable Address Verification Cards for Election Day Registrants
November 2004 Elections

Reason for Return	City of Madison	City of Waukesha	City of Eau Claire	Village of Ashwaubenon	Total	Percentage of Grand Total
Moved, Forwarding Address Provided	849	212	118	0	1,179	62.5%
Not Deliverable as Addressed	408	79	105	18	610	32.3
No Such Address	17	10	20	0	47	2.5
Other	21	22	8	0	51	2.7
Grand Total	1,295	323	251	18	1,887	100.0%

Only 69.1 percent of municipalities removed the names found on undeliverable cards from their registration lists.

Although statutes require names to be removed from voter registration lists when address verification cards are undeliverable, only 69.1 percent of municipalities that mailed address verification cards to mail-in or Election Day registrants reported doing so. Instead, 50.6 percent of municipalities that sent address verification cards reported attempting to correct errors by reconciling information from returned cards with other municipal databases before removing names from their registration list.

City of Milwaukee officials could not provide us with the number of address verification cards returned from among those sent to more than 73,000 Election Day registrants because these cards have been turned over to the Milwaukee County district attorney and the U.S. Attorney for the Eastern District of Wisconsin, who are reviewing them as part of an ongoing investigation into voting irregularities. However, in May 2005, the investigators identified more than 1,300 unverifiable Election Day registrations for which votes were cast. Among these:

- 548 did not include the voter's address;
- 141 included addresses outside of the City of Milwaukee;
- 48 did not include the voter's name;
- 28 lacked the voter's signature;

- 23 had other illegible information; and
- 517 had other unspecified problems.

In the City of Milwaukee, like other municipalities, the poll worker who accepts a voter registration form is responsible for verifying that the information provided is complete and legible. It should be noted that none of the municipalities whose address verification cards we reviewed reported difficulties with verifying addresses because of illegible or insufficient information. Nevertheless, the existence of incomplete or illegible registration forms for Election Day registrants in the City of Milwaukee raises concerns about the extent to which poll workers follow Election Day registration procedures, including verifying that registrants provide legible and complete information.

District Attorney Review

To determine the usefulness of address verification cards for investigating improper or illegal voting, we conducted a telephone survey of district attorneys whose offices should have received information about undeliverable cards after the November 2004 elections. Section 6.56, Wis. Stats., requires municipal clerks to provide district attorneys with the names of Election Day registrants whose cards are returned, but as noted, there is no similar requirement for mail-in registrants.

Only 24.3 percent of municipalities forwarded names from undeliverable cards to the district attorney, as required by law.

Only 9 of the 37 district attorneys' offices we spoke with reported having received lists of names based on undeliverable address verification cards. Similarly, of the 70 municipalities that reported mailing address verification cards to Election Day registrants, only 17, or 24.3 percent, reported forwarding the names from returned cards to the district attorney after the November 2004 elections.

According to district attorneys, address verification cards alone are not sufficient for investigating improper and illegal voting.

There are no statutory requirements or guidelines for district attorneys to act upon the information they receive, and many of the offices we surveyed indicated that an effective investigation cannot be conducted based solely on a list of names from undeliverable address verification cards because:

- the cards do not prove that an individual actually voted, and additional information, such as the list of voters from the polling place, is needed to determine whether a vote can be attributed to a specific name;

- additional information is needed to determine whether the individual who submitted the voter registration form is the same person as the name indicated on the card; and
- most of the cards are undeliverable because of a recent change of address or a missing apartment number, and such investigations are likely to be an inefficient use of resources.

One-third of the municipalities that sent cards to Election Day registrants did not do so until three or more months after the election.

Furthermore, district attorneys often do not receive information about returned cards until well after an election. As shown in Table 10, among the 70 municipalities that reported mailing verification cards to Election Day registrants, one-third did not mail the cards until three or more months after the election. Delays in mailing the address verification cards not only increase the number of cards that are undeliverable because of address changes, they can make it more difficult for district attorneys to find evidence of improper or illegal voting.

Table 10

**Completion of Mailing for Election Day Address Verification Cards
November 2004 Elections**

Month Mailing Completed	Municipalities Reporting	Percentage Reporting
November	7	10.0%
December	20	28.6
January	20	28.6
February	16	22.9
March	3	4.2
April or later	4	5.7
Total	70	100.0%

None of the district attorneys we spoke with reported identifying election law violations based on returned address verification cards. Further, several district attorneys suggested that additional information would be helpful to them when investigating returned address verification cards, including copies of the actual cards rather than a list of names, copies of lists of voters, and copies of the original signed registration forms.

Enhancing the Usefulness of Address Verification Cards

Because address verification cards are not sent to individuals who register at the polls until after an election, they cannot prevent ineligible persons from registering on Election Day and voting. Nonetheless they can, if properly implemented, serve as a check to ensure that voter registration information is correct and has been accurately recorded by the municipal clerk. Three of the five other states with Election Day registration use notices similar to address verification cards, including Minnesota, which sends address verification cards to all registrants. In contrast, Maine and Wyoming send notices only to individuals who register at the polls but cannot demonstrate proof of residence, while Idaho and New Hampshire do not use address verification cards.

Additional guidance is needed to ensure that municipal clerks use address verification cards consistently.

Some municipalities have questioned the cost-effectiveness of sending address verification cards to registrants who may have moved, rather than using other sources of information to verify whether the address provided on the registration form is valid. However, unless the Legislature amends ch. 6, Wis. Stats., address verification cards will continue to be required when the new statewide voter registration list becomes effective in 2006. We believe that improvements could be made to reduce the cost of mailing the cards, enhance their usefulness, and ensure more consistent practices statewide. For example, it may be more desirable, consistent, and timely to have the Elections Board send address verification cards on behalf of municipalities that request such assistance than to have each municipality send the cards individually. Cards could still be returned to the municipalities for follow-up. In addition, the Elections Board has the authority to promulgate administrative rules and to provide guidance to clerks in how to use the cards consistently.

Recommendation

We recommend the Elections Board:

- *specify procedures in administrative rules for sending address verification cards, validating returned cards, and forwarding questionable cards, including cards returned from addresses provided by mail-in registrants, to district attorneys; and*
- *conduct post-election reviews to ensure that municipalities are sending cards consistently.*

In addition, to improve the accuracy of voter registration lists, the Legislature may wish to:

- require that address verification cards be mailed to each individual who registers to vote, including those who register in person with the municipal clerk or a special registration deputy, unless the clerk can verify that the individual has moved using other sources of information, such as municipal tax records or change of address data available from the Postal Service;
- establish a deadline for mailing address verification cards, so that improper registrations can be identified promptly; and
- give municipal clerks greater flexibility in the disposition of returned address verification cards by, for example, requiring only cards that cannot be reconciled through other sources of information to be turned over to district attorneys.

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Voter Registration Lists ■

Municipalities do not consistently follow procedures for updating registration lists.

Accurate and complete voter registration lists safeguard the integrity of election results by ensuring that qualified electors are allowed to vote while helping to prevent ineligible persons from voting. Chapter 6, Wis. Stats., establishes procedures by which clerks are to maintain and revise their municipalities' voter registration lists, but we found that the statutory requirements for list maintenance are not consistently followed. As a result, registration lists include both duplicate records and the names of individuals who are ineligible to vote, and we identified 105 instances of potential voting irregularities during the November 2004 elections. Some concerns related to inaccurate voter registration lists may be addressed by the statewide voter registration system that is currently under development, but additional efforts are necessary to ensure the accuracy of voter registration information.

Maintaining Voter Registration Lists

Because individuals whose names appear on the voter registration list are presumed to meet all eligibility requirements, it is important that the list contain the names of only qualified electors. Section 6.50, Wis. Stats., requires municipal clerks to remove or inactivate the names of individuals who have not voted in four years, to update registration information for individuals who move or change their names, and to remove or inactivate the names of deceased individuals. To evaluate the effectiveness of these procedures for

maintaining voter registration lists, we reviewed voter registration data from eight municipalities we selected for detailed analysis. We were unable to review the City of Milwaukee’s list because of the ongoing criminal investigation.

Inactive Electors

Under s. 6.50(1), Wis. Stats., municipal clerks are required within 90 days following each general election to identify and send notices to electors who have not voted at least once in the past four years in that municipality. If no response is received, the clerk is required to remove that name from the list of eligible voters. In many instances, individuals who have not voted in recent elections have moved out of the municipality and should no longer be included on the registration list. Nonetheless, it is important to notify electors before removing them from the list, because some may choose not to participate in every election.

The names of inactive electors were removed from registration lists by 85.3 percent of survey respondents.

In our survey, 85.3 percent of municipalities reported inactivating or removing the names of electors who have not voted within the last four years. However, all nine municipal clerks we interviewed stated that after the November 2004 elections, the Elections Board advised them not to remove the names of individuals who had not voted within the last four years so that the largest number of addresses would be incorporated into the new statewide voter registration list. Consequently, we identified individuals who had not voted since 1998, rather than 2000, in determining whether these municipalities had removed inactive electors in the past.

We found no inactive electors on the City of Eau Claire’s voter registration list. The information provided by three municipalities—the City of Appleton and the towns of Minocqua and Onalaska—was insufficient for a determination, although Town of Minocqua officials reported that they had only recently removed the names of individuals who had not voted in the last ten years. In the remaining four municipalities—the cities of Madison and Waukesha and the villages of Ashwaubenon and Plover—we identified 2,730 individuals who had not voted within the last 6 years, including some who had not voted in more than 20 years.

Of those responding to our survey, 28.6 percent of municipalities do not notify individuals before removing them from the registration list.

Some of the inactive electors we identified may have requested that they be kept on voter registration lists. Except when individuals have died, municipal clerks are required to notify registered voters before removing their names, and inactive electors may request that their registrations be kept active. Nonetheless, only 71.4 percent of the municipalities responding to our survey sometimes or always notify registered voters before removing their names from

registration lists. Further, 28.6 percent reported that they never notify individuals before their names are removed. This practice could result in the improper removal of qualified electors, although Election Day registration ensures that they could still vote.

Change-of-address information from the Postal Service may help municipalities identify individuals who have moved.

Instead of removing the names of electors who have not voted in four years, s. 6.50(8), Wis. Stats., allows municipalities to revise their voter registration lists based on change-of-address information available from the United States Postal Service. If this procedure is followed, a review must be completed at least once every two years in the 60 days preceding the close of registration for each September primary election. Although none of the nine municipalities we interviewed use Postal Service change-of-address information to revise their voter registration lists, this option could reduce mailing costs because it does not require electors to be notified before their names are removed from the lists.

According to Elections Board officials, the statewide voter registration system will be designed to make it easier for municipal clerks to identify individuals who have not voted in recent elections through better voter history tracking. In addition, the system is intended to automatically identify outdated registration information when a person registers at a new address within Wisconsin.

Name and Address Changes

Section 6.40, Wis. Stats., requires municipal clerks to revise registration lists to reflect name or address changes requested by individuals appearing on the lists. In addition, s. 6.50(3), Wis. Stats., allows clerks to revise registration lists based on reliable information that an individual has moved, even without a request from that person, and requires clerks to notify a new registrant's previous municipality so that its voter registration list can be corrected.

More than one-quarter of municipalities do not send cancellation notices when voters register in their jurisdiction.

In our survey, 92.7 percent of municipalities reported updating information for individuals who move within their municipality. However, only 72.7 percent reported that they always send cancellation notices to other municipalities when a new voter registers, while 27.3 percent reported that they sometimes or never send such notices.

Most of the 3,116 duplicate records we found were caused by poor record-keeping procedures.

To determine whether clerks properly update the voter registration records of individuals who move or change their names, we reviewed registration lists from eight of the nine municipalities we selected for more detailed analysis, excluding the City of Milwaukee. We identified 3,116 records that appear to show individuals who are registered more than once in the same

municipality, representing 0.9 percent of the records we reviewed. These duplications occur for three primary reasons:

- an individual changed his or her name, but the clerk did not remove the previous name from the voter registration list;
- a previous address was not deleted when an individual moved and registered at a new address within the municipality; and
- records included misspellings or other clerical errors.

As shown in Table 11, the City of Eau Claire had the largest number of duplicate records, representing 2.6 percent of the names on its voter registration list. City officials explained that in October 2004, they began entering the full middle name, rather than just the middle initial, for some registration forms, and the registration system did not recognize duplications to the existing list. This practice stopped after the errors were identified.

Table 11

Duplicate Records on Voter Registration Lists

Municipality	Records Reviewed	Records Identified as Duplicates	Percentage of Records Identified as Duplicates
City of Appleton	42,255	396	0.9%
Village of Ashwaubenon	12,027	138	1.1
City of Eau Claire	52,471	1,367	2.6
City of Madison	186,438	755	0.4
Town of Minocqua ¹	4,619	8	0.2
Town of Onalaska	4,195	38	0.9
Village of Plover ¹	6,768	54	0.8
City of Waukesha	39,403	360	0.9
Total	348,176	3,116	0.9

¹ Complete information, including birth dates, was not available, making it more difficult to identify duplicate records.

Duplicate registration records may provide an opportunity for individuals to vote more than once.

Although only 0.9 percent of the voter registration records we reviewed were found to be duplicates, duplicate records present opportunities for individuals to vote more than once. Poll workers might identify a duplicate record and prevent someone from voting twice if both addresses appear in the same ward; however they are unlikely to detect attempts to vote in different municipalities or different wards within the same municipality. Therefore, it is important for municipal clerks to promptly and accurately process address and name changes, remove or inactivate prior registration records, and notify other municipalities when a new voter registers.

Some municipalities have implemented procedures beyond what is specified by law to assist in updating name and address information on their voter registration lists. For example, the cities of Appleton and Waukesha use property tax records, and the Village of Ashwaubenon uses water utility bill information to verify addresses and identify electors who may have moved. Other municipalities may wish to consider adopting similar practices.

Ineligible Voters

According to municipal clerks, the identification of ineligible voters has been hindered in the past by a lack of timely, accurate, and complete information. The identification and removal of these names from voter registration lists is important so that ineligible individuals are not allowed to vote. Therefore, we requested information about procedures used to verify voter eligibility requirements such as citizenship, felony status, and age from the nine municipalities we selected for detailed review. We also compared voter registration lists from six of these municipalities with the names and birth dates of deceased individuals listed in vital statistics records kept by the Social Security Administration and records of felons kept by the Wisconsin Department of Corrections.

We were unable to determine whether ineligible voters were present on the registration lists of the Town of Minocqua and the Village of Plover because birth dates were not available electronically in these municipalities, and we did not have access to Milwaukee's voter registration list. Because information was not readily available, we were unable to determine whether voter registration lists contained the names of noncitizens, individuals who have been adjudicated mentally incompetent, or individuals who have placed bets on the outcome of elections, all of whom are ineligible to vote.

Deceased Individuals

We found the names of 783 deceased individuals on voter registration lists.

Section 6.50(4), Wis. Stats., requires municipal clerks to check vital statistics records and cancel the registration of individuals who are deceased. Of the municipalities that replied to our survey, 98.7 percent reported implementing some procedures to identify deceased individuals. Nevertheless, in six municipalities we reviewed, we identified 783 deceased persons whose names and birth dates matched those of individuals on the voter registration lists, as shown in Table 12.

Table 12

Deceased Persons’ Names Matching Those on Voter Registration Lists

Municipality	Deceased Persons Potentially Registered to Vote
City of Appleton	11
Village of Ashwaubenon	48
City of Eau Claire	261
City of Madison	388
Town of Onalaska	9
City of Waukesha	66
Total	783

Municipalities other than the City of Milwaukee rely primarily on obituaries in local newspapers, information reported to poll workers on Election Day, and notifications by family members to identify deceased individuals on their registration lists. In contrast, the Milwaukee Election Commission has an agreement with the city health department to obtain death records monthly. Although statewide vital statistics records are available from the Department of Health and Family Services for a fee, none of the municipalities we interviewed relied on these data to identify deceased voters. According to Elections Board officials, Department of Health and Family Services vital statistics records will be available to municipal clerks as part of the statewide voter registration system, and it should be easier for municipal clerks to identify and remove deceased voters from their registration lists in the future.

Felons Serving Sentences

We found the names of 453 ineligible felons on voter registration lists.

Convicted felons are not eligible to vote until they have completed their sentences, including probation or parole. At that time, their right to vote is restored under s. 304.078(3), Wis. Stats. Although state law does not specify procedures for removing ineligible felons from voter registration lists, 54.0 percent of municipalities responding to our survey indicated that they did so. As shown in Table 14, we identified 453 felons whose names and birth dates matched those of individuals on the voter registration lists in six municipalities.

Table 13

Felons’ Names Matching Those on Voter Registration Lists

Municipality	Felons Potentially Registered to Vote
City of Appleton	44
Village of Ashwaubenon	3
City of Eau Claire	49
City of Madison	335
Town of Onalaska	1
City of Waukesha	21
Total	453

Municipal clerks are informed of federal, but not state, felony convictions.

Municipal clerks currently lack access to information that would allow them to verify whether a person registering to vote is a felon who has not completed his or her sentence. Under the National Voter Registration Act of 1993, the United States Department of Justice is required to notify state election officials when individuals are convicted of federal felonies. The Elections Board forwards these notices to the appropriate municipal clerk, based on the last known address of the federally convicted felon. In contrast, none of the municipalities we interviewed reported receiving information about individuals convicted of state felonies from either the Department of Corrections or the Elections Board.

According to Elections Board officials, the statewide voter registration system will be linked to felony conviction information available from the Department of Corrections. The system will be

designed to notify municipal clerks when an individual who attempts to register has been convicted of a felony and is under state supervision in Wisconsin. Despite potential improvements over current practices, the proposed system will still have limitations. For example, individuals convicted of federal felonies or convicted of state felonies but placed under county supervision will not be included in the automated data available from the Department of Corrections. Furthermore, although the new system will allow clerks to identify felons who try to register before an election, it will not prevent felons from registering to vote at the polls on Election Day.

It has been suggested that municipal clerks be required to print the names of felons and other ineligible voters on their registration lists to notify poll workers that these individuals should not be allowed to vote. Currently, municipalities in Minnesota include the names of felons on their registration lists, and three municipalities—the Village of Ashwaubenon and the cities of Eau Claire and Madison—indicated to us in interviews that their voter registration systems could inactivate ineligible felons without deleting them from their databases. However, this practice will not prevent an ineligible felon from re-registering at the polls unless the address used to identify that felon is printed on the registration list used in the ward where he or she attempts to vote.

Ineligible felons could be prevented from unknowingly violating voting laws with revisions to the voter registration form. The current form does not require registrants to declare that they are not serving a sentence, including probation or parole, for a felony conviction. Rather, it requires them to certify only that they “meet the eligibility requirements of the State of Wisconsin.” In contrast, voter registration forms in Idaho and Minnesota clearly state that individuals who have been convicted of felonies and have not had their rights restored are ineligible to vote.

Wisconsin’s registration form does not inform felons that they are ineligible to vote.

Because the statement on the Wisconsin form is vague, ineligible felons may be unaware that they are restricted from voting. A revised registration form that clearly states felons serving sentences are ineligible, and that requires all registrants to certify that they are not currently serving a sentence for a felony conviction, could help in preventing felons from voting. Such a statement could also serve as evidence for prosecutors seeking to prove that an ineligible felon who voted knowingly violated the law.

Recommendation

We recommend the Elections Board change the voter registration form so that registrants must certify that they are not currently serving a sentence, including probation or parole, for a felony conviction.

Noncitizens

Municipal clerks lack the necessary information to verify citizenship.

United States citizenship is a basic requirement for voting, but there are no readily available, comprehensive sources of information for municipal clerks to use in verifying citizenship. Although s. 6.325, Wis. Stats., allows clerks to require naturalized citizens to show their naturalization certificates when registering, none of the municipalities we interviewed have procedures in place to verify a voter's citizenship status. Instead, municipal clerks rely on the registrant's affirmation of citizenship on the registration form.

The difficulty of verifying citizenship is not unique to Wisconsin. In a June 2005 review of procedures for verifying the eligibility of persons on voter registration lists in seven states, including Wisconsin, the United States Government Accountability Office (GAO) reported that all of these states rely solely on voter self-affirmation to verify citizenship. In 2004, Arizona passed a ballot initiative that requires proof of citizenship to register to vote, but the documents that will be acceptable as proof have not yet been finalized.

Federal data sources may assist municipal clerks in identifying noncitizens who attempt to vote.

The GAO report identified several federal data sources that can help election officials identify registrants who may be noncitizens, including federal juror information and information maintained by the Department of Homeland Security. However, GAO notes that the usefulness of these data may be limited by restrictions on the release of some information that could be used as identifiers, and by the unreliability of self-reported information such as name, birth date, and address. Nonetheless, California is exploring the use of a Department of Homeland Security database that contains more than 60 million records and was developed to allow state, local, and federal governments to obtain information about the immigration status of individuals applying for public benefits.

Wisconsin's noncitizen population is relatively small compared to those of many other states. According to the 2000 census of the United States, only 2.2 percent of Wisconsin residents are foreign-born noncitizens, compared to the nationwide average of 6.6 percent. However, the number of foreign-born noncitizens in Wisconsin has more than doubled since 1990. Therefore, the Elections Board may wish to consider obtaining federal data to assist municipal clerks in verifying the citizenship of individuals registering to vote in Wisconsin.

Voting Irregularities

We reviewed more than 348,000 electronic voter registration records in eight selected municipalities that did not include Milwaukee. As part of our review, we compared the names, addresses, and birth dates of individuals credited with voting in November 2004 to a list of felons provided by the Department of Corrections and to vital statistics records provided by the U.S. Social Security Administration. We also reviewed voter registration lists to determine whether individuals may have voted twice in the same municipality and to verify birth dates.

We identified 105 instances of potentially improper or fraudulent votes.

In six municipalities where sufficient information was available, we identified 105 instances of potentially improper or fraudulent votes during the November 2004 elections. We have forwarded the names of the individuals we identified to the appropriate district attorneys for additional investigation, which is needed to verify that these irregularities are not attributable to clerical errors or to different individuals with the same names and birth dates.

We identified two instances in which individuals appear to have voted twice. One occurred in the City of Madison, and the other in the City of Waukesha. In Madison, one individual cast an absentee ballot and also voted in person at a polling place using the same address. In Waukesha, one individual registered at a new address and voted by absentee ballot at the clerk's office three days before the election, but also appears to have voted at the polling location for a previous address on Election Day.

We also found four instances of voters who had cast absentee ballots that were included in the official election results despite the fact that these voters died during the two weeks preceding the election. According to ss. 6.21 and 6.88(3)(b), Wis. Stats., absentee ballots cast by individuals who die before Election Day should be rejected at the polls if a poll worker has proof that the voter is deceased.

In one instance, it appears that someone who was born in 1987 and who would have been 17 years old on Election Day voted in the City of Madison. According to municipal officials, this individual registered at the polls, gave a birth year of 1987, and checked the box on the registration form indicating he was 18 years old. The discrepancy was not discovered by the poll worker.

We identified 98 ineligible felons who may have voted in the November 2004 elections.

Finally, as shown in Table 14, we identified 98 ineligible felons whose names and birth dates matched those of individuals who were recorded as voting in the November 2004 elections. According to the clerks, many of these felons registered at the polls on the day of the election or voted absentee. For example, in the City of Madison, 28 of the 57 felons registered at the polls, while 9 voted absentee.

Table 14

Felons' Names Matching Those Recorded as Voting

Municipality ¹	Felons Recorded as Voting in November 2004
City of Appleton	16
Village of Ashwaubenon	1
City of Eau Claire	15
City of Madison	57
Town of Onalaska	0
City of Waukesha	9
Total	98

¹ Birth dates were not available from the Town of Minocqua and the Village of Plover; therefore there was insufficient information to identify felons who may have voted in these municipalities.

Currently, state law requires felons to be notified at sentencing that they cannot vote until they have completed their sentences, including any probationary or parole periods. In addition, clerks are required to post notices at polling locations informing felons who have not completed their sentences that they are ineligible to vote. Despite these requirements, current procedures to inform felons of their loss of voting rights and to prevent them from voting appear to be inadequate.

Improving Oversight of Voter Registration Lists

The statewide voter registration system may improve the accuracy of voter registration lists.

Elections Board officials believe the new statewide voter registration system will improve the accuracy of voter registration lists by standardizing registration procedures, preventing duplicate registrations across municipalities, and enhancing the ability of local election officials to detect improper registrations and ineligible voters. According to Elections Board officials, the new system is being designed to:

- identify potential duplicate records when new registrations are entered;
- verify the identity of individuals registering to vote based on driver licensing information from the Department of Transportation;

- identify ineligible felons based on information from the Department of Corrections;
- identify electors who are deceased based on vital statistics records from the Department of Health and Family Services;
- perform statutorily required procedures for maintaining voter registration lists, such as notifying voters if their registrations are canceled, automatically sending address verification cards, and canceling registrations for individuals who have not voted in four years;
- track voter history, including absentee ballots and the method by which every registration form was received; and
- allow for public access through the Internet to verify registration information and polling locations.

Nevertheless, the statewide voter registration list alone will be insufficient to prevent errors and inaccuracies from occurring in voter registration data. A number of other errors in the municipal voter registration lists we reviewed raise questions about the accuracy of the information upon which the new statewide system will be based. For example, we found:

- 91 records of individuals who voted in the November 2004 elections but whose birth dates were recorded incorrectly as later than November 2, 1986;
- 97 instances of individuals who were mistakenly recorded as voting twice in the November 2004 elections; and
- more than 15,000 records, or 4.3 percent of those we reviewed, that were missing birth dates, making it difficult to compare these names to individuals on lists of deceased individuals and felons under state supervision.

Additional efforts are needed to prevent data entry errors and other inaccuracies on voter registration lists.

Because the statewide voter registration system will continue to rely on data entry by municipal clerks and other local officials, we believe additional procedures are needed to prevent incomplete and erroneous data from being included on the statewide list. The Elections Board could be directed to promulgate administrative rules, as authorized by s. 5.05(1)(f), Wis. Stats., to clearly outline the procedures that local election officials, including municipal clerks, should follow in registering voters and maintaining voter registration lists.

☑ Recommendation

We recommend the Elections Board, in cooperation with local election officials, promulgate administrative rules specifying procedures for:

- *detecting and preventing common data entry errors, such as duplicate registration records and invalid birthdates;*
- *revising and updating voter registration information; and*
- *automating the identification of improper registrations and illegal votes.*

There are currently no civil penalties for election officials who do not perform their duties.

The Elections Board has limited options for enforcing voter registration requirements and other election laws. Currently, only criminal—not civil—penalties exist in statute for election officials who fail to perform their duties. Given the variations in voter registration practices we identified, these penalties appear to be ineffective in ensuring that municipalities comply with elections laws. To improve compliance with existing election laws, the Legislature may wish to consider granting the Elections Board authority to pursue civil penalties, including fines against municipalities or election officials who fail to comply with election laws.

☑ Recommendation

We recommend the Elections Board promulgate administrative rules to clarify the responsibilities of all local election officials in registering voters and, if authorized by statute, specify civil penalties for noncompliance.

Future Considerations ■

Our audit confirms that voter registration practices vary among municipalities. We also found that voter registration requirements are confusing, registration lists contain ineligible voters and duplicate records, and address verification cards are not used consistently. As a result, current voter registration practices are not sufficient to ensure the accuracy of voter registration lists used by poll workers. However, Wisconsin's voter registration process will change significantly with the implementation of a computerized statewide voter registration system in January 2006. While that system is expected to address many of the concerns identified in this report, additional training for municipal clerks would help to ensure that existing laws are followed and that the statewide system is implemented consistently.

To address any remaining concerns about the voter registration process and voting irregularities in Milwaukee, the City of Milwaukee Election Commission could be asked to report to the Legislature on its progress in implementing recommendations issued by a task force in June 2005. Finally, we have been asked to undertake future projects to evaluate Wisconsin's election laws—including an evaluation of HAVA implementation and compliance with polling place accessibility requirements—following the November 2006 elections.

Municipal Clerk Training

Municipal clerks currently are not required to attend elections-related training.

Chapter 7, Wis. Stats., requires the Elections Board to prescribe by rule both initial and continuing training requirements for chief election inspectors who supervise activities at polling locations. However, there are no training requirements for municipal clerks, who have greater responsibilities for election administration. Optional training opportunities that are currently available to municipal clerks include:

- a summer training session for county and municipal clerks offered each year through the University of Wisconsin-Green Bay;
- presentations by Elections Board staff at county and municipal clerk association meetings;
- training sessions organized by county clerks; and
- informational meetings organized by the Elections Board.

In addition, many municipal clerks have attended a three-hour training session required for chief election inspectors, who serve as the lead poll workers on Election Day. From August 2004 through October 2004, the Elections Board held 143 training sessions for a total of 7,570 attendees. The number of clerks attending these training sessions is unknown because the Elections Board did not specifically track this information.

The training for chief election inspectors provides an overview of Election Day responsibilities for poll workers, such as counting absentee ballots, issuing provisional ballots, and conducting post-election activities. However, it does not include specific information related to voter registration, such as requirements for list maintenance and the responsibility for sending address verification cards. Elections Board officials have indicated that even past training sessions designed specifically for clerks have included little instruction on voter registration requirements, because this information did not apply to more than 1,500 municipalities that are not required to register voters.

Because the chief election inspector training curriculum is intended for a different audience, mandating attendance by municipal clerks would not address the deficiencies we identified relating to the voter registration process. A separate training curriculum, designed specifically for municipal clerks, could offer useful instruction on their voter registration responsibilities. The Elections Board has

begun offering training on the new statewide voter registration system to municipal clerks and other local election officials. Since voter registration will be required in all municipalities, additional information on voter registration requirements, address verification cards, and list maintenance procedures could be included in these training sessions.

Minimum training requirements could be established to ensure consistent implementation of election laws.

However, to ensure consistency among municipalities in implementing election laws, including voter registration, the Legislature may wish to establish minimum training requirements for the municipal clerks. Some states, including Minnesota and Maine, require municipal clerks to meet minimum training requirements. For example, Minnesota requires municipal clerks to attend five hours of initial elections training, and four hours of continuing elections training every two years.

Recommendation

We recommend the Elections Board:

- *develop a training curriculum for municipal clerks that explains their roles and responsibilities in elections, including voter registration requirements; and*
- *ensure that municipal clerks have access to sufficient training opportunities, including Internet-based courses or courses offered through other organizations such as technical colleges or the University of Wisconsin System.*

City of Milwaukee Recommendations

The Milwaukee task force found numerous problems with voter registration in that city.

This audit was prompted, in part, by concerns about voting irregularities in the City of Milwaukee in the November 2004 elections. A task force established by Milwaukee’s mayor in January 2005 released its findings and recommendations in June 2005. The task force identified numerous problems with voter registration in Milwaukee, including insufficient staff and training, outdated registration lists, poll worker and data entry errors, illegible registration forms, inadequate written procedures for election staff to follow, and an inability to adequately identify ineligible felons who register at the polls. Its recommendations related to voter registration include:

- reorganizing staff responsibilities in the City of Milwaukee Election Commission;

- developing standard operating procedures;
- implementing formal training for both staff and poll workers, and cross-training staff to help improve voter registration practices;
- revising voter registration forms to include a clear statement that felons are ineligible to vote unless they have completed their sentences, including probation or parole;
- ensuring that address verification cards are sent consistently, as required by law; and
- establishing tighter controls over special registration deputies, including requiring deputies to identify themselves on registration forms and prohibiting deputies from being compensated based on the number of new registrations submitted.

The task force recommendations mirror many of the findings and recommendations identified in this report, including some that require legislative action. To ensure that voter registration and other election problems are being addressed in Milwaukee, the City of Milwaukee Election Commission could be asked to report formally on its progress in implementing these recommendations.

Recommendation

We recommend the City of Milwaukee Election Commission report to the Joint Legislative Audit Committee by March 1, 2006, on its implementation of the task force's recommendations.

Future Audits

This office has two pending projects relating to election law administration in Wisconsin. First, 2005 Wisconsin Act 25, the 2005-07 Biennial Budget Act, requests that the Joint Legislative Audit Committee approve an evaluation of recent information technology projects undertaken by the Elections Board, including the statewide voter registration system. Second, 2003 Wisconsin Act 265 directs this office to evaluate:

- state and local government compliance with election laws and the appropriateness of procedures used to implement those laws, specifically including compliance with polling place accessibility requirements;

- the treatment of any elector complaints concerning alleged violations of law, specifically including complaints relating to denial of the right to vote and denial of the right to corroborate registration information on behalf of electors;
- attempts to require electors to provide identification that is not authorized by law;
- any incidences of inadequate availability of ballots for all electors who wish to vote;
- any allegations of elector fraud and the treatment of those allegations; and
- the appropriateness and legality of procedures used to identify ineligible electors whose names appear on the registration list.

We currently expect to begin work on this evaluation in 2007, following the November 2006 elections, which will be the first elections for federal office following implementation of the statewide voter registration system.

■ ■ ■ ■

Appendix 1

Municipalities with Voter Registration Lists

November 2004

Municipality	Type	County	Estimated Population 2004 ¹	Voting-Age Population 2004 ¹	State-Required Voter Registration List
Akan	Town	Richland	453	330	
Algoma	Town	Winnebago	6,024	4,164	Yes
Allouez	Village	Brown	15,494	12,063	Yes
Altoona	City	Eau Claire	6,719	5,088	Yes
Antigo	City	Langlade	8,586	6,478	Yes
Appleton	City	Outagamie, Calumet, Winnebago	71,895	52,191	Yes
Arbor Vitae	Town	Vilas	3,261	2,581	
Arena	Village	Iowa	764	533	
Ashippun	Town	Dodge	2,383	1,772	
Ashland	City	Ashland, Bayfield	8,577	6,670	Yes
Ashwaubenon	Village	Brown	17,661	13,195	Yes
Baraboo	City	Sauk	11,188	8,403	Yes
Barnes	Town	Bayfield	647	537	
Barton	Town	Washington	2,587	1,921	
Bass Lake	Town	Sawyer	2,340	1,633	
Bayside	Village	Ozaukee, Milwaukee	4,286	3,290	
Beaver Dam	City	Dodge	15,366	11,530	Yes
Beaver Dam	Town	Dodge	3,665	2,672	
Bellevue	Village	Brown	13,836	10,111	Yes
Beloit	City	Rock	36,058	26,085	Yes
Beloit	Town	Rock	7,293	5,593	Yes
Berlin	City	Green Lake, Waushara	5,326	3,988	Yes
Big Flats	Town	Adams	1,016	798	
Black Wolf	Town	Winnebago	2,423	1,875	
Bloomfield	Town	Walworth	6,039	4,312	Yes
Blooming Grove	Town	Dane	1,744	1,344	
Boulder Junction	Town	Vilas	985	813	
Brighton	Town	Kenosha	1,504	1,101	
Bristol	Town	Kenosha	4,692	3,478	
Brookfield	City	Waukesha	39,607	28,989	Yes
Brookfield	Town	Waukesha	6,418	5,007	Yes
Brown Deer	Village	Milwaukee	11,845	9,521	Yes
Brussels	Town	Door	1,142	829	

¹ Wisconsin Department of Administration population estimates.

Municipality	Type	County	Estimated Population 2004 ¹	Voting-Age Population 2004 ¹	State-Required Voter Registration List
Buchanan	Town	Outagamie	6,715	4,378	Yes
Burke	Town	Dane	3,081	2,342	
Burlington	City	Racine, Walworth	10,183	7,350	Yes
Burlington	Town	Racine	6,511	4,833	Yes
Cable	Town	Bayfield	844	657	
Caledonia	Town	Racine	24,452	18,102	Yes
Campbell	Town	La Crosse	4,417	3,367	
Cedarburg	City	Ozaukee	11,331	8,247	Yes
Cedarburg	Town	Ozaukee	5,720	4,113	Yes
Center	Town	Outagamie	3,328	2,427	
Chippewa Falls	City	Chippewa	13,155	9,977	Yes
Clay Banks	Town	Door	418	314	
Clintonville	City	Waupaca	4,675	3,529	
Cloverland	Town	Vilas	984	819	
Coloma	Town	Waushara	722	579	
Commonwealth	Town	Florence	425	324	
Conover	Town	Vilas	1,183	924	
Cottage Grove	Village	Dane	4,559	3,098	
Crandon	City	Forest	1,962	1,440	
Crescent	Town	Oneida	2,099	1,561	
Cudahy	City	Milwaukee	18,315	14,099	Yes
Darien	Town	Walworth	1,851	1,381	
De Forest	Village	Dane	8,061	5,550	Yes
De Pere	City	Brown	22,038	16,634	Yes
Dekorra	Town	Columbia	2,406	1,839	
Delafield	City	Waukesha	6,720	4,931	Yes
Delafield	Town	Waukesha	8,210	5,549	Yes
Delavan	City	Walworth	8,158	5,787	Yes
Delavan	Town	Walworth	4,767	3,582	
Denmark	Village	Brown	2,017	1,466	
Dousman	Village	Waukesha	1,757	1,271	
Doylestown	Village	Columbia	337	232	
Dunn	Town	Dane	5,280	4,054	Yes
Eagle River	City	Vilas	1,481	1,194	
East Troy	Town	Walworth	3,888	2,946	
East Troy	Village	Walworth	3,850	2,777	
Eau Claire	City	Eau Claire, Chippewa	63,897	50,064	Yes
Egg Harbor	Town	Door	1,323	1,032	
Egg Harbor	Village	Door	261	235	

¹ Wisconsin Department of Administration population estimates.

Municipality	Type	County	Estimated Population 2004 ¹	Voting-Age Population 2004 ¹	State-Required Voter Registration List
Elkhorn	City	Walworth	8,191	5,901	Yes
Elm Grove	Village	Waukesha	6,250	4,691	Yes
Elmwood Park	Village	Racine	464	382	
Enterprise	Town	Oneida	275	227	
Erin	Town	Washington	3,802	2,782	
Evansville	City	Rock	4,409	3,126	
Farmington	Town	Jefferson	1,522	1,124	
Fitchburg	City	Dane	22,030	16,766	Yes
Florence	Town	Florence	2,365	1,830	
Fond du Lac	City	Fond du Lac	42,865	32,511	Yes
Fontana	Village	Walworth	1,842	1,471	
Forestville	Village	Door	427	330	
Fort Atkinson	City	Jefferson	11,943	9,049	Yes
Fox Point	Village	Milwaukee	6,886	5,240	Yes
Franklin	City	Milwaukee	31,804	24,361	Yes
Freedom	Town	Outagamie	5,466	3,827	Yes
Fulton	Town	Rock	3,220	2,455	
Gardner	Town	Door	1,234	965	
Genesee	Town	Waukesha	7,502	5,286	Yes
Geneva	Town	Walworth	4,858	3,744	
Genoa City	Village	Walworth, Kenosha	2,466	1,628	
Germantown	Village	Washington	19,001	13,855	Yes
Gibraltar	Town	Door	1,156	970	
Glendale	City	Milwaukee	13,024	10,499	Yes
Grafton	Village	Ozaukee	11,160	8,222	Yes
Grand Chute	Town	Outagamie	19,723	15,108	Yes
Grand Rapids	Town	Wood	7,960	5,686	Yes
Green Bay	City	Brown	103,653	77,280	Yes
Greendale	Village	Milwaukee	14,128	10,968	Yes
Greenfield	City	Milwaukee	36,059	29,246	Yes
Greenville	Town	Outagamie	7,634	5,154	Yes
Hales Corners	Village	Milwaukee	7,682	5,985	Yes
Harrison	Town	Calumet	7,917	5,463	Yes
Hartford	City	Washington, Dodge	12,068	8,741	Yes
Hartland	Village	Waukesha	8,267	5,815	Yes
Hayward	City	Sawyer	2,230	1,726	
Hayward	Town	Sawyer	3,440	2,459	
Hazelhurst	Town	Oneida	1,320	1,043	
Hobart	Village	Brown	5,486	3,850	Yes

¹ Wisconsin Department of Administration population estimates.

Municipality	Type	County	Estimated Population 2004 ¹	Voting-Age Population 2004 ¹	State-Required Voter Registration List
Holland	Town	La Crosse	3,168	2,180	
Holmen	Village	La Crosse	6,984	4,775	Yes
Homestead	Town	Florence	388	300	
Howard	Village	Brown, Outagamie	15,208	10,974	Yes
Howards Grove	Village	Sheboygan	2,926	2,071	
Hudson	City	St. Croix	10,561	7,977	Yes
Hudson	Town	St. Croix	7,214	4,821	Yes
Hull	Town	Portage	5,544	4,005	Yes
Hunter	Town	Sawyer	826	653	
Hurley	City	Iron	1,805	1,477	
Jackson	Town	Burnett	805	682	
Jackson	Village	Washington	5,678	4,123	Yes
Jacksonport	Town	Door	759	581	
Janesville	City	Rock	61,310	45,252	Yes
Janesville	Town	Rock	3,264	2,540	
Jefferson	City	Jefferson	7,458	5,761	Yes
Juneau	City	Dodge	2,656	2,100	
Kaukauna	City	Outagamie, Calumet	13,926	10,065	Yes
Kenosha	City	Kenosha	92,808	67,541	Yes
Kimberly	Village	Outagamie	6,362	4,718	Yes
King	Town	Lincoln	869	708	
Koshkonong	Town	Jefferson	3,514	2,624	
Kronenwetter	Village	Marathon	5,791	4,144	Yes
La Crosse	City	La Crosse	51,507	41,804	Yes
La Grange	Town	Walworth	2,495	1,890	
La Pointe	Town	Ashland	275	222	
Lac du Flambeau	Town	Vilas	3,136	2,201	
Lafayette	Town	Chippewa	5,662	4,159	Yes
Lake Geneva	City	Walworth	7,276	5,606	Yes
Lake Hallie	Village	Chippewa	5,345	3,839	Yes
Lake Mills	City	Jefferson	4,971	3,621	
Lake Nebagamon	Village	Douglas	1,017	757	
Lake Tomahawk	Town	Oneida	1,186	990	
Lakewood	Town	Oconto	916	744	
Land O'Lakes	Town	Vilas	918	746	
Lannon	Village	Waukesha	962	742	
Liberty Grove	Town	Door	1,958	1,583	
Lincoln	Town	Eau Claire	1,121	766	
Lincoln	Town	Forest	1,021	753	

¹ Wisconsin Department of Administration population estimates.

Municipality	Type	County	Estimated Population 2004 ¹	Voting-Age Population 2004 ¹	State-Required Voter Registration List
Lincoln	Town	Vilas	2,708	2,158	
Lisbon	Town	Waukesha	9,630	6,960	Yes
Little Chute	Village	Outagamie	10,775	7,638	Yes
Madison	City	Dane	217,935	178,904	Yes
Madison	Town	Dane	6,936	5,641	Yes
Maine	Town	Marathon	2,419	1,784	
Manitowish Waters	Town	Vilas	669	561	
Manitowoc	City	Manitowoc	34,612	26,263	Yes
Marinette	City	Marinette	11,638	8,881	Yes
Marion	Town	Waushara	2,163	1,748	
Marshfield	City	Wood, Marathon	19,012	14,666	Yes
Mayville	City	Dodge	5,164	3,831	Yes
Mazomanie	Village	Dane	1,543	1,122	
McFarland	Village	Dane	7,051	4,988	Yes
Medary	Town	La Crosse	1,478	1,066	
Menasha	City	Winnebago, Calumet	16,779	12,451	Yes
Menasha	Town	Winnebago	16,695	12,658	Yes
Menomonee Falls	Village	Waukesha	33,660	25,245	Yes
Menomonie	City	Dunn	15,247	12,880	Yes
Mequon	City	Ozaukee	23,416	16,845	Yes
Merrill	City	Lincoln	10,144	7,582	Yes
Merrill	Town	Lincoln	3,076	2,277	
Merton	Town	Waukesha	8,220	5,705	Yes
Middleton	City	Dane	16,446	12,708	Yes
Middleton	Town	Dane	5,230	3,666	Yes
Milton	City	Rock	5,419	3,925	Yes
Milwaukee	City	Milwaukee, Waukesha, Washington	593,920	423,811	Yes
Minocqua	Town	Oneida	5,128	4,121	Yes
Monico	Town	Oneida	378	256	
Monona	City	Dane	7,965	6,332	Yes
Monroe	City	Green	10,973	8,282	Yes
Mosinee	City	Marathon	4,162	3,069	
Mount Horeb	Village	Dane	6,244	4,446	Yes
Mount Morris	Town	Waushara	1,121	894	
Mount Pleasant	Village	Racine	24,347	18,916	Yes
Mountain	Town	Oconto	873	685	
Mukwonago	Town	Waukesha	7,391	5,072	Yes
Mukwonago	Village	Waukesha, Racine, Walworth	6,428	4,787	Yes

¹ Wisconsin Department of Administration population estimates.

Municipality	Type	County	Estimated Population 2004 ¹	Voting-Age Population 2004 ¹	State-Required Voter Registration List
Muskego	City	Waukesha	22,203	16,094	Yes
Namakagon	Town	Bayfield	295	266	
Nasewaupee	Town	Door	1,949	1,540	
Nashville	Town	Forest	1,182	874	
Necedah	Town	Juneau	2,349	1,676	
Neenah	City	Winnebago	25,193	18,255	Yes
New Berlin	City	Waukesha	38,896	29,255	Yes
New London	City	Outagamie, Waupaca	7,232	5,390	Yes
New Richmond	City	St. Croix	7,244	5,338	Yes
Nokomis	Town	Oneida	1,417	1,095	
North Bay	Village	Racine	260	178	
North Prairie	Village	Waukesha	1,815	1,273	
Norway	Town	Racine	7,860	5,550	Yes
Oak Creek	City	Milwaukee	31,029	23,279	Yes
Oconomowoc	City	Waukesha	13,194	9,937	Yes
Oconomowoc	Town	Waukesha	7,646	5,704	Yes
Onalaska	City	La Crosse	15,782	11,652	Yes
Onalaska	Town	La Crosse	5,406	3,786	Yes
Oneida	Town	Outagamie	4,298	2,869	
Oostburg	Village	Sheboygan	2,773	1,953	
Oregon	Town	Dane	3,276	2,253	
Oregon	Village	Dane	7,976	5,546	Yes
Oshkosh	City	Winnebago	65,095	51,598	Yes
Oshkosh	Town	Winnebago	2,808	2,239	
Ottawa	Town	Waukesha	3,822	2,812	
Otter Creek	Town	Eau Claire	532	368	
Paddock Lake	Village	Kenosha	3,106	2,177	
Palmyra	Town	Jefferson	1,163	903	
Palmyra	Village	Jefferson	1,779	1,297	
Paris	Town	Kenosha	1,514	1,137	
Pelican	Town	Oneida	2,602	1,946	
Pewaukee	City	Waukesha	12,425	9,559	Yes
Pewaukee	Village	Waukesha	8,864	6,900	Yes
Phelps	Town	Vilas	1,438	1,174	
Phillips	City	Price	1,676	1,295	
Pine Lake	Town	Oneida	2,827	2,187	
Platteville	City	Grant	10,109	8,657	Yes
Pleasant Prairie	Village	Kenosha	18,122	13,193	Yes
Plover	Village	Portage	11,074	7,883	Yes

¹ Wisconsin Department of Administration population estimates.

Municipality	Type	County	Estimated Population 2004 ¹	Voting-Age Population 2004 ¹	State-Required Voter Registration List
Plum Lake	Town	Vilas	509	408	
Plymouth	City	Sheboygan	8,080	5,988	Yes
Popple River	Town	Forest	90	82	
Port Washington	City	Ozaukee	10,683	7,928	Yes
Portage	City	Columbia	9,966	7,647	Yes
Prairie du Chien	City	Crawford	6,053	4,586	Yes
Prescott	City	Pierce	3,873	2,849	
Presque Isle	Town	Vilas	552	476	
Preston	Town	Adams	1,429	1,102	
Quincy	Town	Adams	1,283	1,103	
Racine	City	Racine	80,806	57,578	Yes
Randall	Town	Kenosha	3,098	2,231	
Raymond	Town	Racine	3,639	2,670	
Reedsburg	City	Sauk	8,573	6,281	Yes
Rhineland	City	Oneida	8,041	6,158	Yes
Rib Falls	Town	Marathon	968	695	
Rib Mountain	Town	Marathon	7,635	5,515	Yes
Rice Lake	City	Barron	8,490	6,494	Yes
Richfield	Town	Washington	11,195	8,217	Yes
Richland Center	City	Richland	5,151	4,039	Yes
Richmond	Town	Walworth	1,899	1,423	
Ripon	City	Fond du Lac	7,619	5,846	Yes
River Falls	City	Pierce, St. Croix	13,067	10,727	Yes
River Hills	Village	Milwaukee	1,625	1,226	
Riverview	Town	Oconto	869	768	
Rome	Town	Adams	2,888	2,390	
Rothschild	Village	Marathon	5,071	3,731	Yes
Round Lake	Town	Sawyer	1,040	838	
Russell	Town	Lincoln	723	525	
Salem	Town	Kenosha	10,767	7,578	Yes
Saratoga	Town	Wood	5,457	4,021	Yes
Schoepke	Town	Oneida	353	289	
Schofield	City	Marathon	2,250	1,771	
Scott	Town	Brown	3,519	2,709	
Scott	Town	Burnett	630	553	
Sevastopol	Town	Door	2,790	2,154	
Shawano	City	Shawano	8,425	6,399	Yes
Sheboygan	City	Sheboygan	50,672	37,680	Yes
Sheboygan	Town	Sheboygan	7,013	5,065	Yes

¹ Wisconsin Department of Administration population estimates.

Municipality	Type	County	Estimated Population 2004 ¹	Voting-Age Population 2004 ¹	State-Required Voter Registration List
Sheboygan Falls	City	Sheboygan	7,139	5,432	Yes
Shelby	Town	La Crosse	4,772	3,495	
Sherman	Town	Iron	345	315	
Shorewood	Village	Milwaukee	13,535	10,696	Yes
Sister Bay	Village	Door	914	814	
Slinger	Village	Washington	4,143	3,034	
Somers	Town	Kenosha	9,294	7,289	Yes
South Milwaukee	City	Milwaukee	21,360	16,245	Yes
Sparta	City	Monroe	8,994	6,663	Yes
St. Francis	City	Milwaukee	8,728	7,040	Yes
Stettin	Town	Marathon	2,243	1,688	
Stevens Point	City	Portage	25,094	20,517	Yes
Stockton	Town	Portage	2,974	2,109	
Stoughton	City	Dane	12,654	9,078	Yes
Sturgeon Bay	City	Door	9,696	7,416	Yes
Sturtevant	Village	Racine	5,451	4,360	Yes
Suamico	Village	Brown	10,067	7,091	Yes
Sugar Creek	Town	Walworth	3,624	2,594	
Sullivan	Village	Jefferson	691	537	
Summit	Town	Waukesha	5,068	3,665	Yes
Sun Prairie	City	Dane	23,226	16,599	Yes
Superior	City	Douglas	27,221	21,043	Yes
Sussex	Village	Waukesha	9,576	6,768	Yes
Thiensville	Village	Ozaukee	3,278	2,601	
Three Lakes	Town	Oneida	2,388	1,873	
Tomah	City	Monroe	8,648	6,419	Yes
Turtle	Town	Rock	2,423	1,852	
Twin Lakes	Village	Kenosha	5,388	3,930	Yes
Two Rivers	City	Manitowoc	12,599	9,378	Yes
Union	Town	Door	901	666	
Union Grove	Village	Racine	4,459	3,184	
Vernon	Town	Waukesha	7,358	5,292	Yes
Verona	City	Dane	8,888	6,098	Yes
Verona	Town	Dane	2,150	1,596	
Vienna	Town	Dane	1,307	962	
Vilas	Town	Langlade	250	189	
Wales	Village	Waukesha	2,547	1,775	
Washburn	City	Bayfield	2,284	1,676	
Washington	Town	Door	698	530	

¹ Wisconsin Department of Administration population estimates.

Municipality	Type	County	Estimated Population 2004 ¹	Voting-Age Population 2004 ¹	State-Required Voter Registration List
Washington	Town	Eau Claire	7,227	5,238	Yes
Washington	Town	Vilas	1,624	1,293	
Waterford	Town	Racine	6,281	4,490	Yes
Watertown	City	Jefferson, Dodge	22,732	16,827	Yes
Watertown	Town	Jefferson	1,914	1,440	
Waukesha	City	Waukesha	66,816	50,320	Yes
Waukesha	Town	Waukesha	8,659	6,096	Yes
Waunakee	Village	Dane	10,002	6,792	Yes
Waupaca	City	Waupaca	5,821	4,344	Yes
Waupun	City	Dodge, Fond du Lac	10,670	8,537	Yes
Wausau	City	Marathon	38,912	29,033	Yes
Wausau	Town	Marathon	2,257	1,710	
Wauwatosa	City	Milwaukee	46,511	35,674	Yes
Webb Lake	Town	Burnett	412	344	
West Allis	City	Milwaukee	60,607	47,579	Yes
West Bend	City	Washington	29,204	21,758	Yes
West Bend	Town	Washington	4,835	3,674	
West Milwaukee	Village	Milwaukee	4,142	3,279	
Weston	Town	Marathon	567	415	
Weston	Village	Marathon	13,003	9,306	Yes
Westport	Town	Dane	3,761	2,980	
Wheatland	Town	Kenosha	3,354	2,452	
Whitefish Bay	Village	Milwaukee	13,979	9,866	Yes
Whitewater	City	Walworth, Jefferson	13,996	11,952	Yes
Whitewater	Town	Walworth	1,446	1,145	
Williams Bay	Village	Walworth	2,566	1,939	
Winchester	Town	Vilas	487	426	
Wind Point	Village	Racine	1,834	1,402	
Windsor	Town	Dane	5,607	4,002	Yes
Winneconne	Town	Winnebago	2,252	1,729	
Wisconsin Rapids	City	Wood	18,410	13,857	Yes
Woodruff	Town	Oneida	2,049	1,602	
Wyoming	Town	Waupaca	298	231	
Yorkville	Town	Racine	3,310	2,503	

¹ Wisconsin Department of Administration population estimates.

Appendix 2

VOTER REGISTRATION APPLICATION¹

For Wisconsin Residents

You can use this form to: <input type="checkbox"/> register to vote <input type="checkbox"/> report that your name or address has changed Please print in blue or black ink.		This space for office use only.				
1	Mr. Mrs. Miss Ms.	Last Name	First Name	Middle Name(s)	(Circle One) Jr Sr II III IV	
2	Address (see instructions) - Street (or route & box number)		Apt. or Lot #	City/Town	State	Zip Code
3	Address Where You Get Your Mail if Different From Above (See Instructions)			City/Town	State	Zip Code
4	Date of Birth _____/_____/_____		6	ID Number - Check the applicable box and provide the appropriate number. <input type="checkbox"/> WI Department of Transportation-issued driver's license or identification card number _____ <input type="checkbox"/> Last 4 digits of social security number _____ (only if you do not have a WI driver's license or I.D.) <input type="checkbox"/> I have neither a WI driver's license or I.D., nor a social security number.		
5	Telephone Number (Optional)					
7	Please answer the following questions by checking "yes" or "no." Are you a citizen of the United States of America? <input type="checkbox"/> Yes <input type="checkbox"/> No Will you be 18 years of age on or before election day? <input type="checkbox"/> Yes <input type="checkbox"/> No If you checked "no" in response to either of these questions, do not complete this form. <input type="checkbox"/> I certify that I meet the eligibility requirements of the State of Wisconsin, and that the information I have provided is true to the best of my knowledge under penalty of perjury. If I have provided false information, I may be subject to a fine or imprisonment or both under Federal or State laws.					
▶	Signature of elector – Please sign full name or put mark.			Date _____/_____/_____		
8	Signature and address of corroborating witness. Or, if the applicant is unable to sign, signature and address of the assistant who helped the applicant fill out this application.					
9	Signature of election official or special registration deputy.					

Please fill out the sections below as they apply to you. MAIL REGISTRANTS: PLEASE SEE SECTION D.

If this application is for a change of name, what was your name before you changed it?

A	Mr. Mrs. Miss Ms.	Last Name	First Name	Middle Name(s)	(Circle One) Jr Sr II III IV	
If you were registered before but this is the first time you are registering from the address in Box 2, what was your address where you were registered before?						
B	Street (or route and box number)		Apt. or Lot #	City/Town	State	Zip Code

If you live in a rural area but do not have a street number, or if you have no address, please show on the map where you live.

<p>C</p> <ul style="list-style-type: none"> <input type="checkbox"/> Write in the names of the crossroads (or streets) nearest to where you live <input type="checkbox"/> Draw an X to show where you live. <input type="checkbox"/> Use a dot to show any schools, churches, stores, or other landmarks near where you live, and write the name of the landmark. <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%; border: 1px solid black;">Example</td> <td style="width: 10%; border: 1px solid black;">E I m</td> <td style="width: 50%; border: 1px solid black;">Grocery Store ●</td> <td style="width: 10%; border: 1px solid black;">North ▲</td> </tr> <tr> <td colspan="4" style="border: 1px solid black; text-align: center;">Woodchuck Road</td> </tr> <tr> <td style="border: 1px solid black;">Public School ●</td> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black;">x</td> <td style="border: 1px solid black;"></td> </tr> </table> </div>	Example	E I m	Grocery Store ●	North ▲	Woodchuck Road				Public School ●		x		<p style="text-align: center;">IDENTIFICATION REQUIREMENTS</p> <ul style="list-style-type: none"> <input type="checkbox"/> If you are registering to vote in Wisconsin for the first time, and submitting this application by mail, you must provide identification with this application. <input type="checkbox"/> If you do not provide identification with this application, you will be asked for identification the first time you vote. <input type="checkbox"/> See the instructions in "Box D" on the reverse side of this form for a list of acceptable forms of identification.
Example	E I m	Grocery Store ●	North ▲										
Woodchuck Road													
Public School ●		x											

¹Although the information in box 6 is not yet required under Wisconsin law, it has been requested since the form was revised in August 2003, in anticipation of a requirement that will take effect January 1, 2006.

VOTER REGISTRATION APPLICATION INSTRUCTIONS

Box 1 - Name

Put in this box your full name in this order - Last, First, Middle. Do not use nicknames or initials.

Note: If this application is for a change of name, please tell us in **Box A** (*on the bottom half of the form*) your full name before you changed it.

Box 2 - Home Address

Put in this box your home address (legal voting address). Do **not** put your mailing address here if it is different from your home address. Do **not** use a post office box or rural route without a box number.

Note: If you were registered before *but* this is the first time you are registering from the address in Box 2, please tell us in **Box B** (*on the bottom half of the form*) the address where you were registered before. Please give us as much of the address as you can remember.

Also note: If you live in a rural area but do not have a street address, or if you have no address, please show where you live using the map in **Box C** (*at the bottom of the form*).

Box 3 - Mailing Address

If you get your mail at an address that is different from the address in Box 2, put your mailing address in this box.

Note: If you have no address in Box 2, you **must** write in Box 3 an address where you can be reached by mail.

Box 4 - Date of Birth

Put in this box your date of birth in this order – Month/Day/Year. *Be careful not to use today's date!*

Box 5 - Telephone Number

Most states ask for your telephone number in case there are questions about your application. However, you do **not** have to fill in this box.

Box 6 - ID Number

Provide your WI Department of Transportation-issued driver's license number or identification card number. If you do not have a WI driver's license or I.D., provide the last 4 digits of your social security number. Check the box that indicates which number you will be providing.

Box 7 - Signature

To register in Wisconsin you must:

- be a citizen of the United States;

EB-131 Instructions (Rev. 08/2003)

- be a resident of Wisconsin for at least 10 days;

- be 18 years old;

- not have been convicted of treason, felony or bribery, or, if you have, your civil rights have been restored;

- not have been found by a court to be incapable of understanding the objective of the electoral process;

- not make or benefit from a bet or wager depending on the result of an election;

- not have voted at any other location, if registering on election day.

Answer the questions by checking the appropriate boxes. Sign your **full** name or make your mark, and print today's date in this order – Month/Day/Year.

Box 8 – Signature and Address of Assistant

■ Name of Assistant

If you are unable to sign, put in this box the name and address of the person who helped you.

Box D - Identification

If you are registering to vote for the first time, and submitting this registration form by mail, attach a copy of one of the following forms of identification:

- a copy of a current and valid photo identification;

- a copy of a current utility bill, bank statement, government check, pay check, or government document that shows the name and address of the voter.

**STOP HERE IF REGISTRATION IS BY MAIL!
REMEMBER TO INCLUDE A COPY OF YOUR FORM OF
IDENTIFICATION.**

Box 8 – Signature and Address of Corroborating Witness

- Required when registering in person only.

- Required only if elector cannot provide acceptable proof of residency.

Box 9 – Signature of Election Official or Special Registration Deputy

- Required when registering in person only.

Mail or deliver completed form to:
Municipal Clerk
(applicant's municipality)

Appendix 3

Voter Registration in States with Election Day Registration

	Wisconsin	Minnesota	Idaho	Maine	New Hampshire	Wyoming
Millions of Registered Voters in 2004	2.9 ¹	3.6	0.8	1.0	0.9	0.2
Government Unit Responsible for Voter Registration	Municipal	County	County	Municipal	Municipal	County
Registration Deadline	13 days	21 days	25 days	10 days	10 days	30 days
Registration After the Deadline	Yes	No	No	Yes	No	No
Special Registration Deputies	Yes	Yes	Yes	Yes	Yes	No
Mail-In Registration	Yes	Yes	Yes	Yes	Yes ²	Yes

¹ The number of registered voters in Wisconsin includes only 339 municipalities with required voter registration in 2004; in the other states, totals are statewide. For the November 2004 election, Wisconsin's remaining 1,512 municipalities did not register voters.

² New Hampshire allows mail-in registration only for persons unable to register in person due to physical disability, religious belief, military service, or temporary absence.

Proof of Residence or Identification Required to Register on Election Day

Wisconsin	Minnesota	Idaho
<p>Wisconsin driver license or other official identification card or license issued by a Wisconsin governmental unit, or by an employer in the normal course of business.</p> <p>Credit card or library card.</p> <p>Check-cashing or courtesy card issued by a merchant in the normal course of business.</p> <p>Real estate tax bill or receipt for the current year or the year preceding the date of the election.</p> <p>Residential lease effective for a period that includes the day of the election.</p> <p>University, college, or technical institute identification or fee card.</p> <p>Airplane pilot's license.</p> <p>Gas, electric, or telephone service statement for the period commencing not earlier than 90 days before Election Day.</p>	<p>Minnesota driver license, learner permit, identification card, tribal identification, or receipt for one, with a current address.</p> <p>Tribal identification with utility bill.¹</p> <p>U.S. passport with utility bill.¹</p> <p>U.S. military photo identification card with utility bill.¹</p> <p>Student identification, registration, or fee statement with a current address.</p> <p>Student photo identification with utility bill.¹</p> <p>Student identification for students listed on a housing list on file at the polling place.</p>	<p>Valid Idaho driver license or Idaho identification card issued through the Department of Transportation.</p> <p>Any document that contains a valid address in the precinct and photo identification.</p> <p>Current student identification card from a post-secondary educational institution in Idaho, accompanied with a current fee statement that contains the student's valid address in the precinct and valid photo identification.</p>

¹ In Minnesota, utility bill must include name and current address and must be due within 30 days of the election. Utility bills may be for electric, gas, water, solid waste, sewer, telephone, or cable.

Maine	New Hampshire	Wyoming
<p>Acceptable identification or proof of residence is determined at the discretion of local election officials. Examples of acceptable documents include photo identification, along with one of the following:</p> <ul style="list-style-type: none"> ▪ current motor vehicle registration; ▪ current income tax return; or ▪ current resident hunting and fishing license. 	<p>Acceptable identification or proof of residence is determined at the discretion of local election officials. Examples of acceptable documents include photo identification, along with one of the following:</p> <ul style="list-style-type: none"> ▪ motor vehicle registration; ▪ utility bill; or ▪ pay checks showing current address. 	<p>One of the following if address is current:</p> <ul style="list-style-type: none"> ▪ U.S. passport; ▪ driver license or identification card issued by any state or outlying possession of the United States; ▪ identification card issued by a federal, state, or local government agency; ▪ photo identification card issued by the University of Wyoming, a Wyoming community college, or a Wyoming public school; ▪ U.S. military card; or ▪ identification card issued to a dependent of a member of the U.S. armed forces. <p>Any two or more of the following documents together:</p> <ul style="list-style-type: none"> ▪ certification of U.S. citizenship; ▪ certificate of naturalization; ▪ U.S. military draft record; ▪ voter registration card from another state or county; ▪ U.S. Social Security card; ▪ certification of birth abroad issued by the Department of State; ▪ original or certified copy of a birth certificate bearing an official seal; and ▪ any other form of identification issued by the U.S. federal government or another state.

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September 9, 2005

Janice Mueller, State Auditor
Legislative Audit Bureau
22 East Mifflin Street, Suite 500
Madison, WI 53703

Subject: Response to Legislative Audit Bureau Report on Voter Registration in Wisconsin

Dear Ms. Mueller:

We have reviewed the report prepared by the Legislative Audit Bureau (LAB) on voter registration in Wisconsin requested by the Joint Legislative Audit Committee. The LAB documents a wide variation in the implementation of existing voter registration laws and includes a number of recommendations to improve the voter registration process. The report provides a thorough analysis of the existing voter registration practices. The findings of the LAB buttress the federal mandate for a single statewide voter list controlled by the state set out in the Help America Vote Act of 2002 (HAVA).

Many of the issues identified by the LAB will be addressed by the implementation of the Statewide Voter Registration System (SVRS) required by HAVA and Wisconsin law. S. 6.36, Wis. Stats. The range of issues described in the report also illustrates the complexity of voter registration. It is much more than producing a list of names of eligible voters.

Our response addresses the recommendations and suggestions set out in the Report and provides additional comment. The response was prepared by the State Elections Board staff under the direction of its Executive Director, Wisconsin's chief election official. It does not represent a formal position taken by the Board or its members. We have organized the response according to the contents of the report.

Introduction

Mandatory Voter Registration

The report accurately describes the current system of voter registration as "a patchwork of requirements that is confusing to municipal clerks, poll workers, and the public..." and that "procedures for maintaining voter registration lists are not consistently applied." The Statewide Voter Registration System (SVRS) will provide the tool for ensuring that voter registration lists are maintained in a consistent manner that eliminates much of the confusion of the current system and provides the public with a readily accessible portal into the election process.

Municipal clerks will follow the same procedures for reviewing and processing voter registration forms. There will be a single registration record for each registered voter in the

state. The list of voters will be matched against existing state records to verify identity and identify ineligible voters.

Help America Vote Act of 2002

One of the complexities added to the registration process by HAVA is the identification requirement for first-time voters. First-time voters are individuals who register to vote by mail and have not voted in a federal election in Wisconsin. They are required to provide identification before voting. State and federal law permit the state to verify a voter's identity by matching the information on the voter registration form with existing state records using SVRS.

Elections Board

HAVA has provided funding to enable the State Elections Board to hire short-term employees to meet deadlines mandated by federal law. The 17 federally funded HAVA positions include three individuals on loan from the Department of Administration's Division of Enterprise Technology. HAVA funding was designed as an infrastructure investment. State and local government will have to add resources to maintain and operate SVRS once it is implemented.

Voter Registration Methods

Current Registration Requirements

The LAB notes that "On Election Day, individuals whose names appear on the registration list are presumed to meet all eligibility requirements and ... are neither required to provide identification or proof of residence nor to otherwise demonstrate eligibility." Wisconsin law permits any elector to challenge a voter's eligibility at the polling place. S. 6.92 et. seq., Wis. Stats., ElBd Chapter 9, Wis. Adm. Code.

Changing the Voter Registration Process

The LAB suggests the Legislature may wish to consider changes to address the concerns of local election officials and ensure consistent requirements statewide such as:

- adjusting the statutory registration deadline so that clerks have sufficient time both for verification and to ensure that all qualified electors who have registered are included in the voter registration lists distributed to the polls;
- increasing the oversight and training of special registration deputies, who may be short-term appointees working for voter registration drives or individuals who are appointed only to register voters at the polls on Election Day; and
- establishing uniform requirements for all registrants that reduce confusion without discouraging qualified electors from voting.

These are excellent suggestions. The Legislative Council's Special Committee on Election Law Review may include the recommendation for adjusting the statutory registration deadline

in its proposed legislation. The Report of the National Task Force on Election Law Reform established by the Election Center also includes this recommendation.

SVRS will enable the State Elections Board and municipal clerks to track the source of voter registration forms, which will increase oversight of special registration deputies. The State Elections Board can include specific training requirements for special registration deputies in administrative rules. In July 2004, the State Elections Board provided municipal clerks with direction on training special registration deputies and setting standards for their performance.

The establishment of uniform registration requirements will not only reduce confusion, but will also engender confidence in the registration process. However, it is important to balance voter registration requirements with concerns about erecting barriers to the exercise of the right to vote.

Concerns with Late Registration

Wisconsin law permits a voter to register in person at the office of the municipal clerk after the close of registration 13 days before the election. This is called "late registration."

The LAB suggests that closing registration more than 13 days before the election would allow municipal clerks more time to prepare voter registration lists. As indicated above, this proposal has significant support.

The LAB also suggests that another option for dealing with late registration concerns is to eliminate late registration altogether. One problem with eliminating late registration is that unregistered electors wishing to vote absentee in the clerk's office will not be able to cast an absentee ballot if they are unable to register in the clerk's office.

Improving Oversight and Training for Special Registration Deputies

The LAB recommends the State Elections Board promulgate administrative rules as required by S. 6.26 (3), Wis. Stats., that:

- specify procedures for appointing and revoking the appointments of special registration deputies; and
- establish training requirements and procedures to verify that all special registration deputies are properly instructed.

We support this recommendation. The State Elections Board has not promulgated rules in this area because before 2004 it was not a high enough priority to devote limited staff resources. When the requirement was enacted, the agency's primary focus was on the administration and enforcement of campaign finance requirements. Voter registration was not required in all municipalities and local election officials had not described any significant concerns with special registration deputies.

The increased activity of voter registration groups brought these issues into focus in 2004. In July 2004, the State Elections Board provided municipal clerks with direction on training

special registration deputies and setting standards for their performance. The agency workload in 2004 did not permit the translation of this direction into administrative rules.

This is now a priority of the staff and proposed rules can be integrated into the operation of SVRS. We have discussed the development of a standard curriculum for use by municipal clerks to train special registration deputies.

SVRS will be able to capture a unique number assigned to a special registration deputy. This will enable better tracking of registration forms submitted by special registration deputies.

The LAB suggests the Legislature may wish to consider changes that will reduce the likelihood that special registration deputies will submit duplicate, inaccurate or improper registration forms such as:

- prohibiting special registration deputies from being compensated based on the number of registration forms they submit;
- requiring municipal clerks to track the registration forms submitted by each special registration deputy; and
- requiring municipal clerks to maintain and make publicly available a list of special registration deputies.

These are also excellent suggestions. The Legislative Council's Special Committee on Election Law Review may include the recommendation for prohibiting special registration deputies from being compensated based on the number of registration forms they submit in its proposed legislation. The Report of the National Task Force on Election Law Reform established by the Election Center also includes this recommendation.

SVRS will enable municipal clerks to track the source of voter registration forms. SVRS will also be able to track all appointed special registration deputies. The information will be publicly accessible.

Establishing Uniform Voter Registration Requirements

The LAB suggests the Legislature may wish to consider:

- establishing uniform proof of residence requirements;
- clarifying the requirement in S. 6.36 (1), Wis. Stats., that municipal clerks track the method by which an individual registers to vote;
- repealing S. 6.55 (7)(b), Wis. Stats., which allows individuals registering to vote to type or hand-print address corrections on documents used as proof of residence; and
- amending S. 6.55 (7)(c), Wis. Stats., so that the list of documents allowable under state law is more clearly defined and is consistent with documents that are acceptable under federal law.

The HAVA identification requirement for first-time voters registering by mail added complexity and confusion to the voter registration process. Election Day registrants and late registrants are required to provide proof of residence as defined in S. 6.55 (7), Wis. Stats. First-time voters are required to provide identification. With respect to identification containing a picture of the voter, the federal requirement is broader than state law governing proof of residence because it does not require a current address. Federal law also expands the use of certain government documents beyond what is permissible for proof of residence by including bank statements, government checks, other government documents and paychecks that are current and contain the voter's full name and current address.

Amending state law to make proof of residence more consistent with the identification requirement for first-time voters would alleviate some confusion. The language permitting updating information by hand on proof of residence documents needs to be eliminated along with items from the statutory list of acceptable forms of proof of residence such as credit cards, library cards and credit plates which do not have addresses and do not qualify as acceptable proof of residence.

When Election Day registration was enacted in 1976, the State Elections Board was directed to adopt emergency rules defining acceptable proof of residence. These rules were incorporated into the statutes in their current form. An administrative rule may provide a more flexible vehicle for addressing these concerns. It is more difficult to change a statute when a form of identification becomes outdated.

SVRS will enable clerks to track the method by which a voter registers to vote. This is a mandatory field that must be entered along with the information on a voter registration form.

Address Verification Cards

The report documents the inconsistencies among municipalities with respect to the use of address verification cards. The LAB recommends the State Elections Board:

- specify procedures in administrative rule for sending address verification cards, validating returned cards, and forwarding questionable cards to district attorneys; and
- conduct post election reviews to ensure municipalities are sending cards consistently.

The State Elections Board recognized address verification cards as a place to leverage the benefits of SVRS. The State Elections Board plans to mail the verification cards to ensure that this follow up is done consistently. We expect that this will reduce costs for municipalities. SVRS will have the capability to record municipal clerk follow up on address verification.

The LAB also suggests the Legislature may wish to consider the following steps to ensure the accuracy of registration lists:

- require address verification cards be mailed to every individual who registers to vote unless the municipal clerk can verify the registrant has moved using other sources of information;

- establishing a deadline for mailing address verification cards; and
- giving municipal clerks more flexibility in the disposition of returned address verification cards by allowing municipal clerks to reconcile returned cards through other sources rather than turning them over to district attorneys.

The Legislature may want to consider requiring all voters to provide their birth date and driver's license number as part of the voting process in 2006. This will enable municipal clerk's to capture essential identification information for all registered voters which can be added to SVRS and ensure more accurate matching of voter records.

Keeping SVRS current and accurate will require using additional sources for reconciliation. Municipal clerks are an essential partner in this process. It is important to provide state and local election officials with more flexibility to utilize other sources to reconcile registration discrepancies.

Voter Registration Lists

Maintaining Voter Registration Lists

The report describes the current practices for maintaining voter registration lists and discusses the treatment of inactive voters, name and address changes, and duplicate records. SVRS will bring added efficiencies to this process because each voter will have a single record and the individuals identifying information can be matched with existing state records.

Ineligible Voters

The report also discusses deceased individuals, felons serving sentences and non-citizens. The LAB recommends the State Elections Board change the registration form so that registrants must certify that they are not currently serving a sentence, including probation or parole, for a felony conviction. The SVRS Team is already working on including this change in the design of the voter registration and absentee ballot application forms.

However, there are limitations to the information available from the Department of Corrections. The Department of Corrections does not track convicted felons who are sentenced to county facilities and it does not track federal felons. The State Elections Board plans to create manual processes to ensure that SVRS is notified of both federal felons and state felons serving in county jails.

The interface with State Vital Statistics will allow records of deceased electors to be marked as inactive.

The LAB suggests the State Elections Board consider obtaining federal data to assist municipal clerks in verifying citizenship. The recent focus on Homeland Security may improve the quality of federal data on citizenship. Until that data can be validated as robust and reliable, it is not a viable use of limited SVRS resources.

Improving Oversight of Voter Registration Lists

The LAB sets out a series of recommendations to prevent data entry errors and other inaccuracies. The LAB recommends that the State Elections Board, in cooperation with local election officials, promulgate administrative rules specifying procedures for:

- detecting and preventing common data entry errors, such as duplicate registration records and invalid birth dates;
- revising and updating voter information; and
- automating the identification of improper and illegal votes.

This is not a good use of the administrative rulemaking process. As part of the operation of SVRS, municipal clerks will be given a detailed set of business processes that describe the procedures for handling voter registration forms, entering information into the system and reviewing reports generated by SVRS that identify data entry errors and inconsistencies. These processes will change with more experience on the system. It would significantly reduce administrative flexibility if administrative rules had to be promulgated and amended to reflect changes in business processes. Training has already begun in our pilot county (Dane) on SVRS business processes.

The LAB recommends that the State Elections Board promulgate administrative rules to clarify the responsibilities of all local election officials in registering voters. As a part of the implementation of SVRS, local election officials are required to enter into a memorandum of understanding (MOU) that delineates the responsibilities of local election officials and the State Elections Board with respect to the use of SVRS. These MOUs establish the roles and responsibilities, along with the associated costs for performing various functions related to voter registration, absentee voting and election administration.

The LAB also suggests the Legislature may wish to consider enacting civil penalties for a local election official's failure to comply with election laws. This may be an unpopular means of ensuring administrative accountability. It is definitely worth considering adding a civil penalty component to the election fraud laws which apply to voters as well as election officials. This may provide a useful tool for district attorneys that ensures more enforcement of election law violations.

Future Considerations

Municipal Clerk Training

The LAB recommends the State Elections Board:

- develop a training curriculum for municipal clerks that explains their roles and responsibilities in elections, including voter registration requirements; and
- ensure municipal clerks have access to sufficient training opportunities, including Internet-based courses or courses offered through other organizations such as technical colleges or the University of Wisconsin System.

This recommendation is consistent with the State Elections Board's plans. As part of the SVRS implementation, local election officials will receive approximately 40 hours of business process, application and advanced application training. This training program has already been developed and is being refined through the SVRS pilot program. The business process training was conducted in Dane County in the first week of September and will continue throughout the state this fall. The business process training consists of six hours of in-person instruction.

The State Elections Board will need to dedicate personnel and resources to coordinating ongoing SVRS training as well as continuing training on election administration for local election officials. Once federal funding has been exhausted, the state will need to commit additional resources to this ongoing need.

Conclusion

As we indicated in our appearance before the Joint Legislative Audit Committee on February 9, 2005, the State Elections Board welcomes this audit. At the time, we believed it would provide a vivid picture of voter registration in Wisconsin before the implementation of the Statewide Voter Registration System. The LAB Report provides a valuable benchmark for evaluating the success of SVRS in 2006.

Respectfully submitted,

State Elections Board



Kevin J. Kennedy
Executive Director