



April 7, 2020 Absentee Voting Report

May 15, 2020

Wisconsin Elections Commissioners

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I. Executive Summary

Absentee voting in the April 2020 election reached unprecedented levels but Wisconsin voters, local election officials and election administration systems largely adapted to the demand and managed the volume successfully. At a macro level, the processes to request, receive, return, and review absentee ballots proceeded normally and without inconsistencies. At a local level, the extraordinary volume placed enormous stress on election officials, elections systems, and the United States Postal Service (“USPS”).

Absentee voting remains a largely manual, labor-intensive process administered by each individual jurisdiction across the state. While voters can request a ballot and upload a photo ID on their smart phone in just a few minutes, behind the scenes clerks must still manually verify the IDs, stuff and seal envelopes by hand, apply postage, carry boxes of envelopes to the post office, and physically check off each request. These manual processes have worked well in the past, but they are not easy to scale up without advance warning or extensive preparation. When mail volume is up to ten times higher than anticipated, clerks must complete the same tasks without the benefit of having more staff, additional supplies or more hours to meet statutory deadlines.

Despite these challenges, clerks across the state did what was necessary to complete the task. Many jurisdictions hired and trained temporary staff, developed new procedures, and worked long nights and weekends to meet voter needs. The Wisconsin Elections Commission (“WEC” or “Commission”) likewise hired temporary staff, rapidly expanded technical systems, and worked around the clock to keep up with demand. The data in this report affirms that these efforts were successful, while still revealing opportunities for improvement and important lessons learned.

WEC staff, Wisconsin clerks, and the USPS are working together to make improvements to the absentee voting process and prepare for continued high vote-by-mail volume for the remainder of 2020 and beyond. Process improvements in development will revise the absentee ballot request application, ballot mailing, ballot tracking, and overall quality control. Every step in the process, from the application form, to the envelope, to the tracking tools, is under examination and being evaluated for potential improvements. The tools now in development will provide voters, clerks, and WEC staff with a simpler process and improved communication.

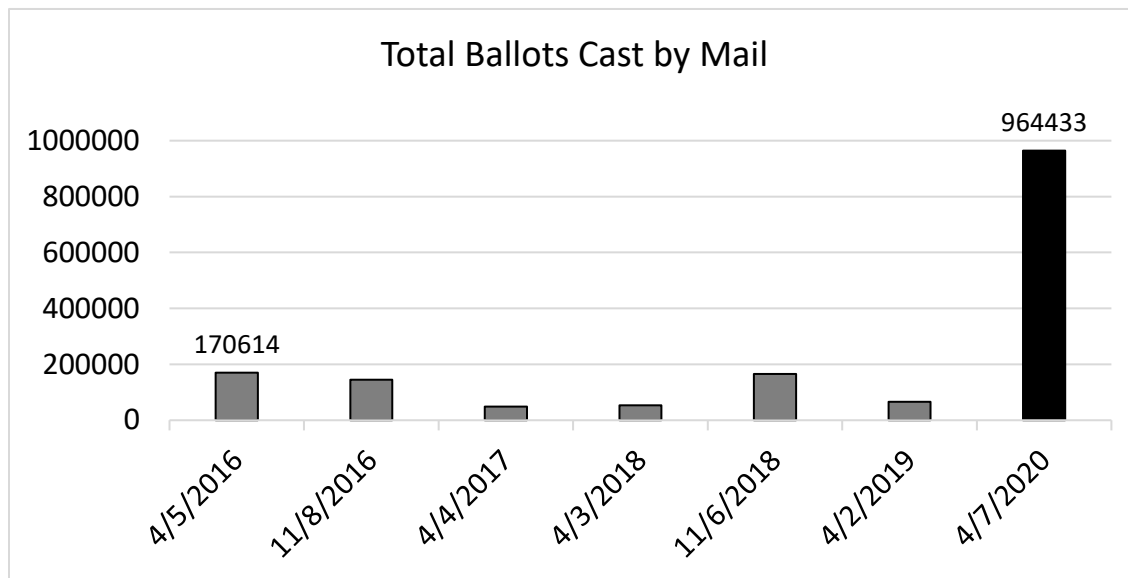
II. Facts: Absentee Voting Data

The April 2020 election broke absentee voting records in Wisconsin while maintaining relatively high turnout for a spring election. Indeed, the April 2020 election produced several state records, including:

- Most by mail ballots ever cast in any Wisconsin election
- Most absentee ballots ever cast in any Wisconsin election
- Second most total ballots ever cast in a Wisconsin Spring Election
- Most in-person absentee ballots in a Wisconsin Spring Election.

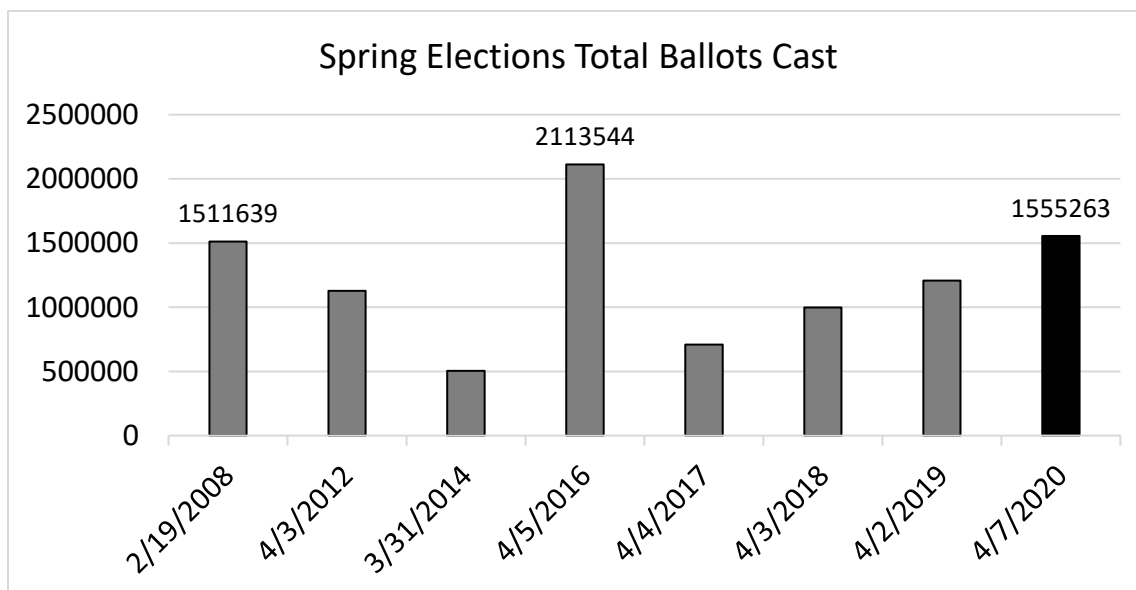
The total number of absentee ballots cast by mail easily surpassed the previous record set in April 2016.

Table 1.



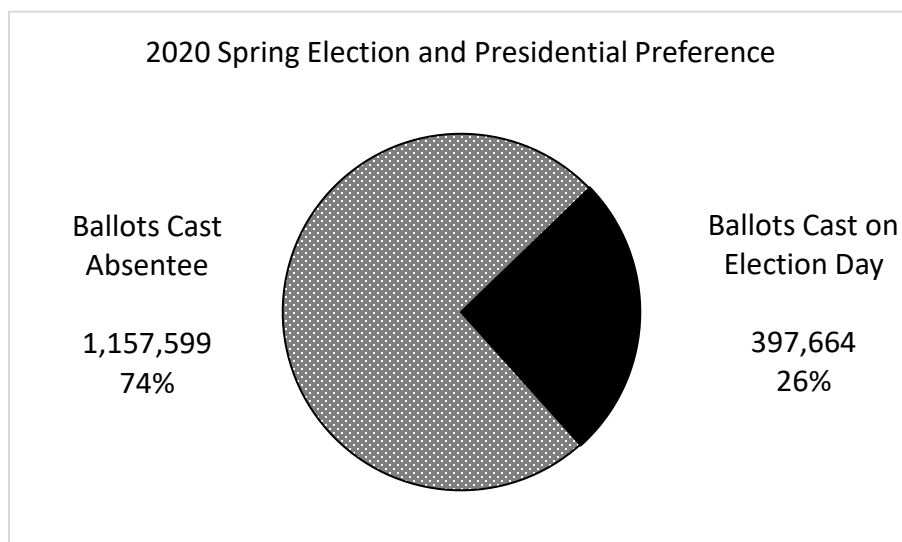
While the COVID-19 pandemic produced an exceptional shift to vote-by-mail, it is not clear that the crisis influenced overall participation. The total ballots cast in the Spring Election and Presidential Preference Vote were not markedly different from previous spring elections. While voter participation for this election was consistent with historic turnout numbers for similar elections, it is also impossible to determine how many voters were unable to cast a ballot for this election due to concerns and complications related to the COVID-19 pandemic. As demonstrated by the chart below, total ballots cast for this election were comparable to the 2008 Spring Election and Presidential Preference Vote and trailed only the same election in 2016 where both major political parties had competitive presidential primaries on the ballot in Wisconsin.

Table 2.



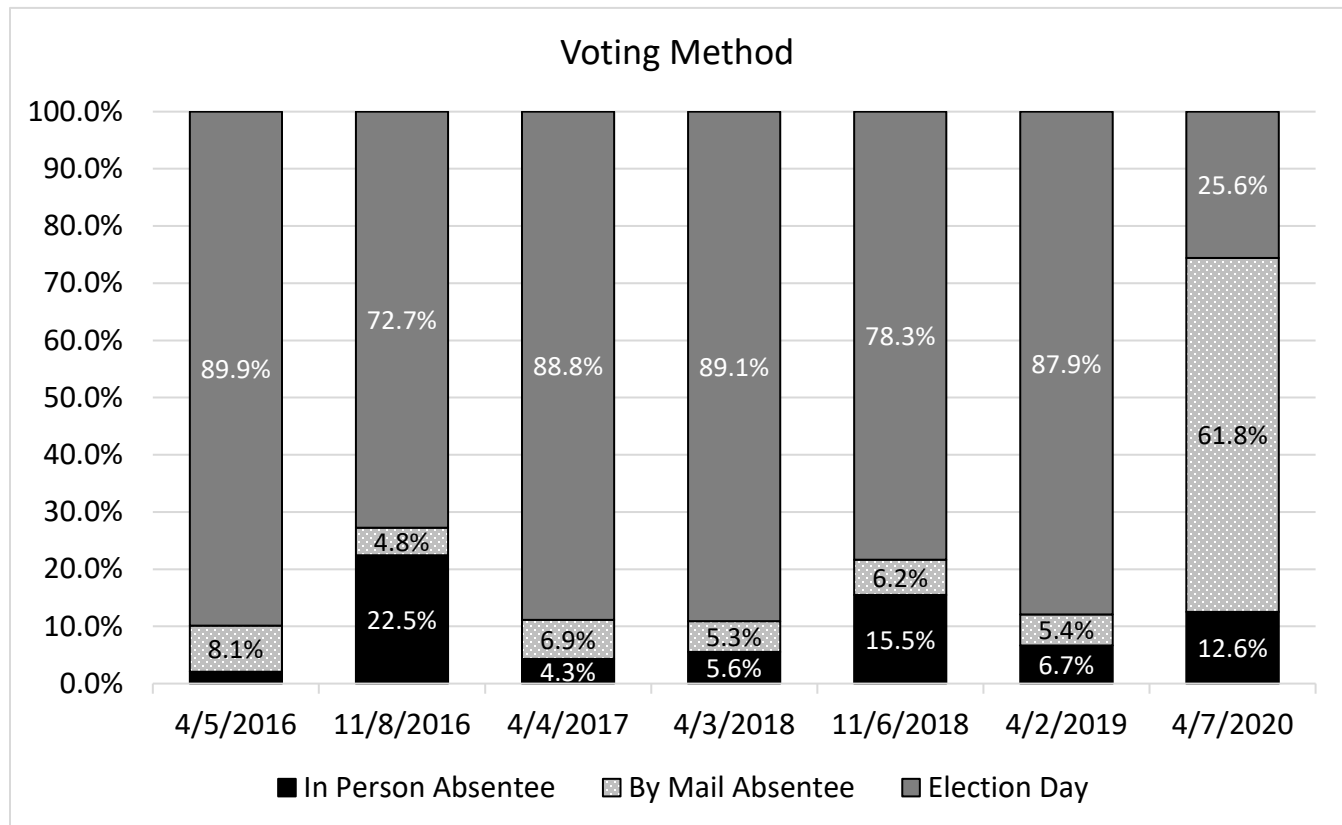
Absentee ballots cast for the April 2020 election also represented a far greater percentage of the ballots cast than is typical. More than three-quarters of the ballots cast were absentee and more than 60% were delivered by mail. Historically, over 80% of ballots in Wisconsin are cast in person on election day and only 6% are cast as by mail absentee ballots. Wisconsin has seen a steady rise in absentee voting percentages in recent years, but those gains could be attributed to an increase in in-person absentee voting, commonly referred to as early voting. For this election, almost 75% of all ballots cast were by absentee voters with over 60% issued and returned by mail. For this election, Wisconsin local election officials saw increases in both in-person absentee voting and absentee by mail, which created resource issues for a system primarily designed to support polling place voting on election day. Some smaller staffs were nearly overwhelmed by the demand and many had to recruit assistance from other municipal departments or secure temporary staff.

Table 3.



As compared with earlier elections, the 2020 shift to voting by mail is distinct, with barely one quarter of voters choosing to cast a ballot on election day. In person voting on election day was still required for this election and each municipality had to dedicate resources to securing, staffing and supplying polling places, while also processing the increased volume of absentee voting. Almost 400,000 voters cast their ballot at a Wisconsin polling place on election day and each municipality operated at least one polling place. The combination of increased by mail absentee voting and continued support of in person voting has resulted in many local election officials reporting that their 2020 municipal postal budgets have already been exhausted or are on pace for shortages.

Table 4.



Nearly 1.3 million absentee ballots were delivered to voters for the April election, either by mail or in person at local clerks' offices. While almost 90 percent of ballots were returned and counted, approximately 1 in 10 ballots were either not returned to the clerk or were returned but rejected. Almost 121,000 absentee ballots were issued by local election officials, but not returned by voters. This report will provide information about several factors that contributed to the number of unreturned ballots.

Table 5.

April 7, 2020 - Absentee Ballots	Absentee Ballot Count	% of Ballots
Total Absentee Ballots Sent ¹	1,303,985	100.00%
Absentee Ballots Returned and Counted	1,159,800	88.94%
Absentee Ballots Returned and Rejected – After 4/13	2,659	0.20%
Absentee Ballots Returned and Rejected - Other	20,537	1.57%
Absentee Ballots Not Returned	120,989	9.28%

¹ An additional 21,301 absentee ballot records were created by clerks but deactivated for administrative reasons (e.g. clerk error, voter error, voter request, ineligible voter, etc.). This represents approximately 1.6% of the total absentee ballot records. Since 2016, the median rate of administrative cancellations is approximately 2.3% of the total absentee ballot records created, with a range of 1.1% (November 2018) to 4.0% (April 2016).

The figures above are largely consistent with the percentage of ballots rejected or not returned in recent April elections. Both the ballot rejection and unreturned ballot rates were consistent with or lower than the previous rates. This comparison does not seek to downplay the concerns and experiences reported by voters who had difficulty receiving or returning their ballot or voters who could not meet the witness requirement due to COVID-19 concerns. It does demonstrate the Wisconsin vote by mail system for the April 7, 2020 election performed consistently with its performance in previous comparable elections, but there are still several opportunities for improvements. The State is currently pursuing multiple initiatives that will improve the by mail absentee process prior to the fall 2020 elections.

Table 6.

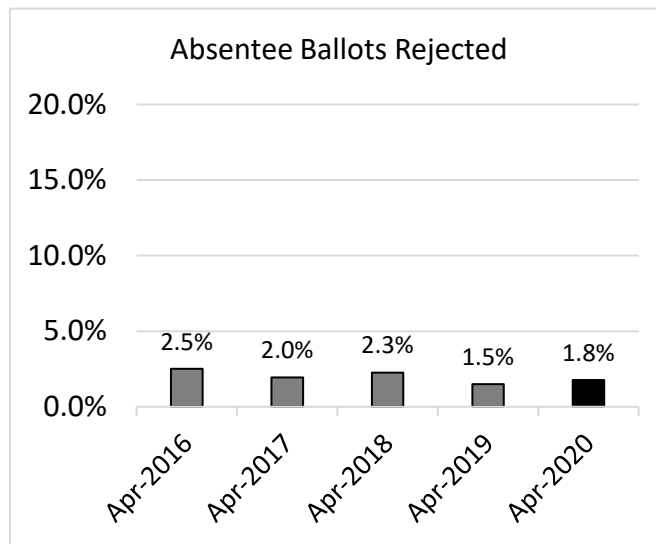
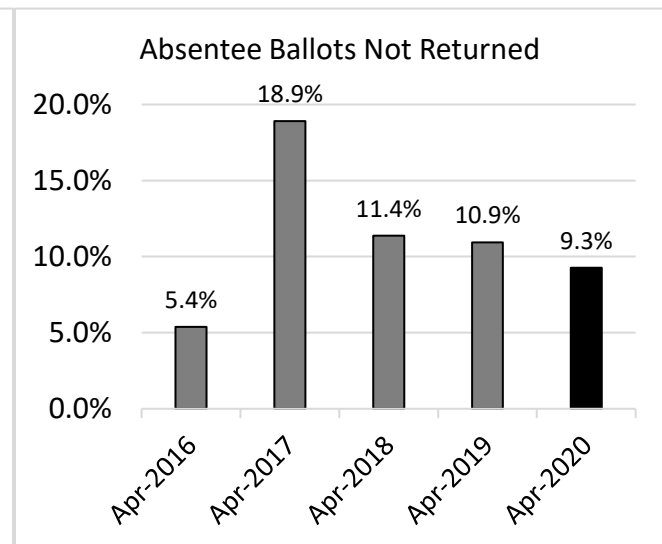


Table 7.



Likewise, most ballots were returned prior to Election Day, but nearly 7% arrived in the window between Election Day and the court ordered deadline of 4:00 p.m. on 4/13/2020. Over 1.1 million of the absentee ballots that were issued for this election were returned in accordance with current Wisconsin state law that requires ballots to be received by 8:00 PM on Election Day in order to be counted. Judge Conley's extension of the ballot return deadline to 4:00 PM on April 13, 2020 resulted in an additional 79,054 ballots being counted for this election. Local election officials have also reported 2,659 ballots that were returned after the April 13 deadline that were not counted due to their late arrival.

Table 8.

April 2020 Absentee Ballot Return Dates	Absentee Ballot Count	% of Ballots
Total Absentee Ballots Returned	1,182,996	100.00%
Ballots returned before 4/8/2020	1,101,324	93.09%
Ballots returned between 4/8/2020 and 4/13/2020	79,054	6.68%
Ballots returned after 4/13/2020	2,659	0.22%

Additional historical data is attached to this report as Exhibit A - Absentee Voting Data.

III. Findings: Absentee Performance During the April 2020 Primary

A. General Assessment

Wisconsin voters demonstrated an unprecedented commitment to the democratic process in the April 2020 election. In the midst of a COVID-19 pandemic and rapidly changing voting rules and protocols, nearly 1.2 million voters cast an absentee ballot in the Spring Election and Presidential Preference Primary. This section assesses the performance of the absentee voting process during the April 2020 election and examines the experiences of voters, election officials, and election systems. The assessment will consider both a broad overview and examine specific case studies from across the state.

1. The Absentee Process in Wisconsin

The Wisconsin Legislature has determined that the vigorous exercise of our constitutional right to vote should be strongly encouraged. The Legislature also recognizes that it is difficult for some individuals to get to their polling place on Election Day. In order to meet this need, the Legislature has established the privilege of absentee voting as an extension of the right to vote on Election Day. The Legislature recognized that the privilege of voting absentee is exercised wholly outside the traditional safeguards of the polling place. It has determined that the privilege of absentee voting must be carefully regulated to prevent the potential for fraud or abuse, overzealous solicitation of absent electors who may prefer not to participate in an election, and undue influence on an absentee elector to vote for or against a candidate or referendum. Wis. Stat. § 6.84(1).

Any qualified elector who is unable or unwilling to appear at the polling place on Election Day may vote by absentee ballot. Wis. Stat. § 6.85. Registered electors wishing to vote absentee must submit an absentee ballot request in writing to the municipal clerk. The request is made to the municipal clerk in writing or electronically using the Application for Absentee Ballot (EL-121), or a letter requesting an absentee ballot which provides the information required on the application form. The written request should include the elector's: 1. Name 2. Residential address 3. Mailing address, if different than residential address 4. Signature 5. Proof of identification, if necessary. Military and Overseas electors may also use the Federal Postcard Application (FPCA), which is a combination registration form and absentee ballot request. Voters may also apply for and vote an absentee ballot in person at the municipal clerk's office. Wis. Stat. § 6.86.

Municipal clerks prepare official absentee ballots for delivery to electors requesting them. An absentee ballot must be sent to any voter with an absentee application on file, no later than 47 days before a federal election, and no later than 21 days before a primary or other election. Otherwise, the municipal clerk shall send or transmit an official absentee ballot within one business day of the time the elector's request for such a ballot is received. Wis. Stat. § 7.15(1)(cm).

The municipal clerk or the clerk's designee is required to enter absentee applications and ballot information into the WisVote system maintained by the Commission within 48 hours after mailing or receiving an in-person absentee ballot application. Wis. Stat. § 6.33(5). Or, in the case where the

municipality relies on the county or another municipality, the clerk shall submit the information to the clerk's WisVote provider, and the provider shall enter the absentee information into the WisVote system within 24 hours. Wis. Stat. § 6.33(5).

2015 Wisconsin Act 261 charged the Government Accountability Board (G.A.B.), and later the Wisconsin Elections Commission, with developing a subscription service that would allow the public to access absentee ballot data that is tracked in WisVote. Given the implementation of the absentee subscription service available in BADGER Voters as well as increase in absentee voting and the growing public interest in obtaining absentee ballot data, it is important that clerks are able to timely and accurately enter absentee ballot data into WisVote including entry of absentee applications, issuance of ballots, and recording ballot statuses. The WEC staff plays an important role in assisting clerks with entering and tracking absentee ballots in the WisVote system.

a. Support Provided by the WEC

Commission staff do not process or send absentee ballots to voters in Wisconsin; all requests are required to be fulfilled by a local municipal clerk. However, Commission staff provide a range of both technical and direct support to municipalities for the absentee request process. The Commission provides access to and maintains the WisVote system and the MyVote website, along with technical support and training related to these products.

The WisVote system is the primary administrative means of tracking and supporting the absentee process in Wisconsin. Along with voter registration records, WisVote allows clerks to track absentee requests for single and multiple elections, create records for issued ballots, and record the final disposition of ballots. Centralized absentee tracking allows Commission staff to monitor and support clerk compliance with Federal and State UOCAVA requirements. It also allows Commission staff to gather and submit federally required absentee information to the U.S. Elections Administration Commission on behalf of all Wisconsin clerks.

WisVote has several built-in reports and report-building functions to further support clerks in the entering and tracking of absentee applications and ballot records. Commission development will also create new reports based on clerk feedback and needs, such as the recent Photo ID Not on File report created to assist clerks in finding and entering any absentee applications missed due to the large influx of requests. This report was created, tested, and deployed in less than one week.

The MyVote Wisconsin website is another integral piece of the absentee voting process. MyVote is a public-facing website that provides a central location for voters to submit an absentee ballot request regardless of where they reside in the state. All requests submitted via MyVote are then transmitted to the municipal clerk via an email notification that includes a copy of the photo ID file, if required, and a PDF version of the absentee request that includes election information, delivery method, and separate mailing address, if provided. MyVote reduces the number of misdirected absentee requests and speeds the absentee process by providing a standard email to assist in organizing emailed requests and

automatically assigning them to the correct jurisdiction based on the voter's address. When a photo ID is not required, the MyVote site will create the tracking record in WisVote automatically while still sending the notification, removing the data-entry requirement for these requests. Voters who do not use the MyVote site may send absentee requests to the incorrect jurisdiction, or even the Elections Commission directly, which leads to requests being delayed or even unfulfilled if the misdirected request is received after a statutory deadline.

Commission staff maintains and develops extensive training materials to update clerks on changes to WisVote and MyVote while also allowing new clerks to obtain the necessary training to use these systems effectively. All clerks and their support staff are given access to an elections training site referred to as The Learning Center ("TLC"). The site includes interactive training modules covering the various functions of WisVote and links to all training webinars produced by Commission training staff. Commission staff also publish and update a user manual for WisVote which includes detailed instructions on using the various functions and features of WisVote. Along with these existing materials, Commission training staff produce and record several training webinars during each election cycle to review topics of concern, preview/review recent updates to WisVote and solicit clerk feedback.

b. Processes at Individual Communities

The absentee request and fulfillment process will include many of the same processes regardless of municipal size or circumstances. Requests must be reviewed to determine type and period of request, if the voter is currently registered, within the jurisdiction, and if an acceptable photo ID was required/provided. All municipalities must mail/email/fax any ballot requests themselves and have a supply of envelopes and ballots to do so. Based on request volume and municipality size, clerks may use WisVote to generate mailing labels while other municipalities will opt for hand-written labels. If a clerk is a self-provider, has WisVote access and tracks their own information, they would also enter the necessary information into WisVote. In municipalities where the clerk is not a WisVote user, they will contract with another municipality or county to enter this information on their behalf while reviewing and fulfilling any absentee requests directly.

For a more detailed accounting of how various municipalities handled the absentee process, please see the Case Studies section below.

2. Voting for April 2020

The April 7 Spring Election and Presidential Preference Vote was by all definitions unprecedented. Wisconsin was the only state thus far to conduct a statewide election during a COVID-19 pandemic stay at home order. Wisconsin is also the most decentralized state for election administration, meaning that 1,850 municipal election officials and 72 county election officials had to adapt to significant changes from court rulings, public health guidance and voter behavior shifts towards vote by mail.

The surge in absentee voting was first felt on the MyVote Wisconsin website. On the MyVote website, voters can request an absentee ballot, track when their ballot was sent and received by their clerk,

register to vote online, find their polling place, view a sample ballot, view their voting history, and more. The site was built and updated regularly by WEC staff with extensive usability studies conducted with hundreds of voters to learn how they use the site.

Based on historical data, most voters went to MyVote to find their polling place or to view a sample ballot. Site analytics show this to be true in February 2020, where traffic to the polling place look up tool reached a new record high. Features like requesting an absentee ballot were previously used by voters, but never at the rate they were utilized in the lead up to the April 2020 election. As a result, the look up tools garnered more attention from developers prior to the COVID-19 pandemic.

To accommodate the rapidly evolving environment, WEC staff were required to make more than a dozen changes to the MyVote system in the 60 days prior to the election. Deadlines for online voter registration and for absentee requests were extended multiple times by court actions prior to this election and deadlines for ballots to be returned and witness requirements were also changed initially, but then changed back. Because this information is hardcoded in the MyVote system, each change required extensive reprogramming and testing to avoid unintended consequences.

The other statewide system supporting the absentee process is WisVote. The WisVote database is the system used by almost 3,000 local election officials to administer elections. While WisVote and the WEC do not issue ballots, the clerks use WisVote to record when they send and receive absentee ballots, generate an absentee ballot log, enter voter registrations, and record voter participation. The system was built by the WEC team and launched in 2016.

WisVote was built based on the way Wisconsin conducts elections, which involves mostly voting in-person at the polls and registering to vote at the polls on election day. By mail voting and registration options are accounted for in the system, but most municipalities had never received a large volume of absentee requests for a specific election prior to this election. Clerk activity in WisVote prior to the election was much higher than any prior election because clerks were all entering and issuing record numbers of absentee requests at the same time. The system performed very well but required around the clock monitoring and auditing to handle this unique and unprecedented user behavior and traffic.

Like MyVote, WisVote required several updates to accommodate extended deadlines for absentee requests and online voter registration. These extensions meant changing automation in the system to assign voter records and allow requests to new deadlines and elections. WEC staff also monitored capacity of the system to ensure adequate memory space. Multiple increases of memory were needed to keep pace with absentee requests and attached copies of photo ID's. WEC staff also created two significant new processes to assist local election officials with the new volume of absentee requests.

One change was to create an absentee ballot request report that documents when a voter submits a request that includes a photo ID. This change was significant because it allowed WisVote to view photo ID files within the system. This process is usually completed by email. Photo files are very large, therefore the storage and capacity in WisVote had to be significantly adjusted.

WEC staff also created “poll book” reports or pages so that jurisdictions with consolidated polling places could use the WisVote system to check in voters, produce and print an individual poll book page for them, and record new registrations and participation in real time on election day. These were not processes that had been conceptualized previously and required significant development and testing completed in one week.

As the enormous quantity of absentee ballots began entering the mail system, voters began asking more questions and expressing concerns about ballot deliveries. With nearly six times more ballots in circulation, the number of complaints and concerns increased by a similar amount. Some voters also reported not receiving their absentee ballots while others reported that their completed ballots were not returned to the clerk in a timely fashion. Starting on April 8, municipalities began reporting irregular or illegible postmarks on ballot return envelopes. WEC staff asked clerks to report their postmark and mailing issues to the USPS and the WEC for investigation. Findings from that research is discussed in the Case Studies section below.

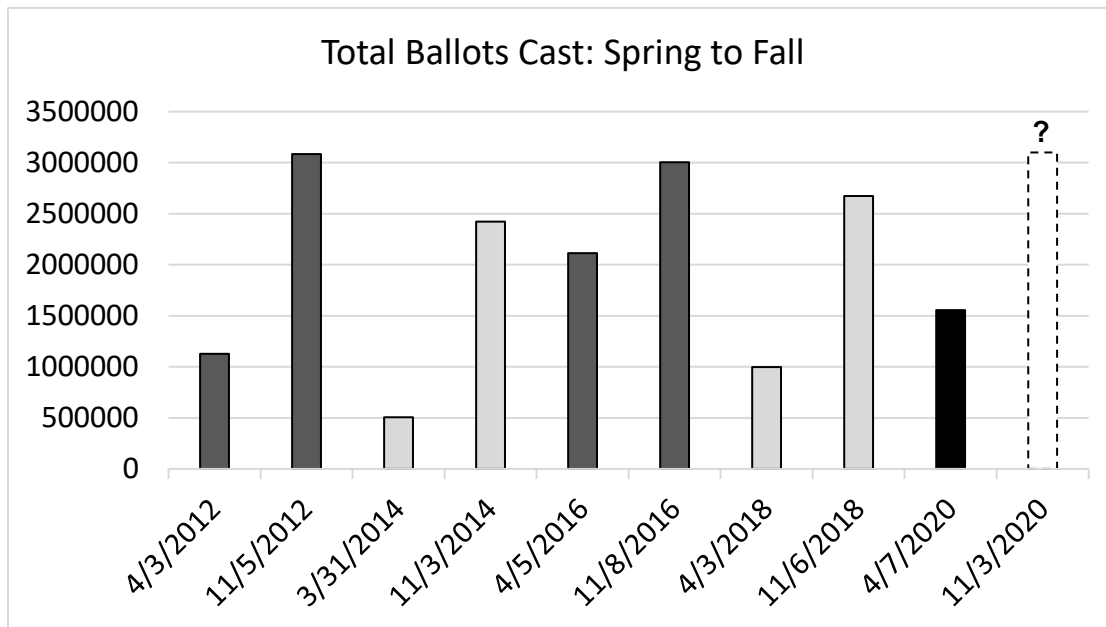
WEC staff also worked with local election officials to understand and collect postmark examples and postal issues. WEC then worked with USPS personnel at the local, state, regional, and national level to get information about the postmark process. Ultimately, USPS provided information that each postal branch made best attempts to postmark ballots on election day, but in the case of missing or illegible postmarks there was no way to determine what date the ballot was marked. WEC staff also sent a letter to local, state, regional, and national USPS representatives asking for them to provide additional information on ballots that were not received and on outgoing ballots that were returned to municipalities without explanation. A response has not yet been received.

Finally, any report on the April 2020 election must include mention of the tremendous support received from partners not typically involved in the elections process. In addition to our regular law enforcement partners, the WEC received exceptional support from the State Emergency Operations Center, Wisconsin Emergency Management, the Wisconsin National Guard, the Wisconsin Department of Health Services, and the federal Cybersecurity and Infrastructure Security Agency. These agencies, working closely with Wisconsin’s 72 county clerks, played a key role in distributing personal protective equipment, sanitization supplies, and even poll workers to more than 2,000 polling places across the State.

3. Other 2020 Elections

Looking ahead to the remainder of 2020, the WEC staff anticipate continued high demand for by mail absentee voting, even if the COVID-19 pandemic begins to subside. November elections generally see high turnout, particularly in presidential election years. The last three presidential general elections all saw more than 3 million ballots cast. If voting patterns from April hold true, the state could see more than 1.8 million requests for absentee ballots by mail. This kind of volume would present terrific challenges for Wisconsin election officials at all levels.

Table 9.



November presidential elections also tend to see a greater proportion of inexperienced voters. That is, voters who vote infrequently or are voting for the first time. These less-experienced voters are more likely to have difficulty navigating the absentee voting process. As a result, the clarification of the process may help voters in November.

B. Specific Case Studies

The absentee voting experiences of voters and election officials were as varied as the 1,850 jurisdictions in the state. Nearly every community experienced unprecedented absentee request volume, and many hired temporary staff to cope with demand. Many small and medium size jurisdictions learned to use WisVote absentee batch processing tools for the first time, having never previously needed any automation assistance to manage their workload. Larger cities, while used to higher volumes, were forced to work around the clock and conduct much larger batch mailings than previously experienced. For all jurisdictions, the statutory requirement to mail ballots within 24 hours of receiving a request presented a significant challenge.

This section examines specific challenges, problems, complaints, and solutions reported by municipal, county, and state election staff.

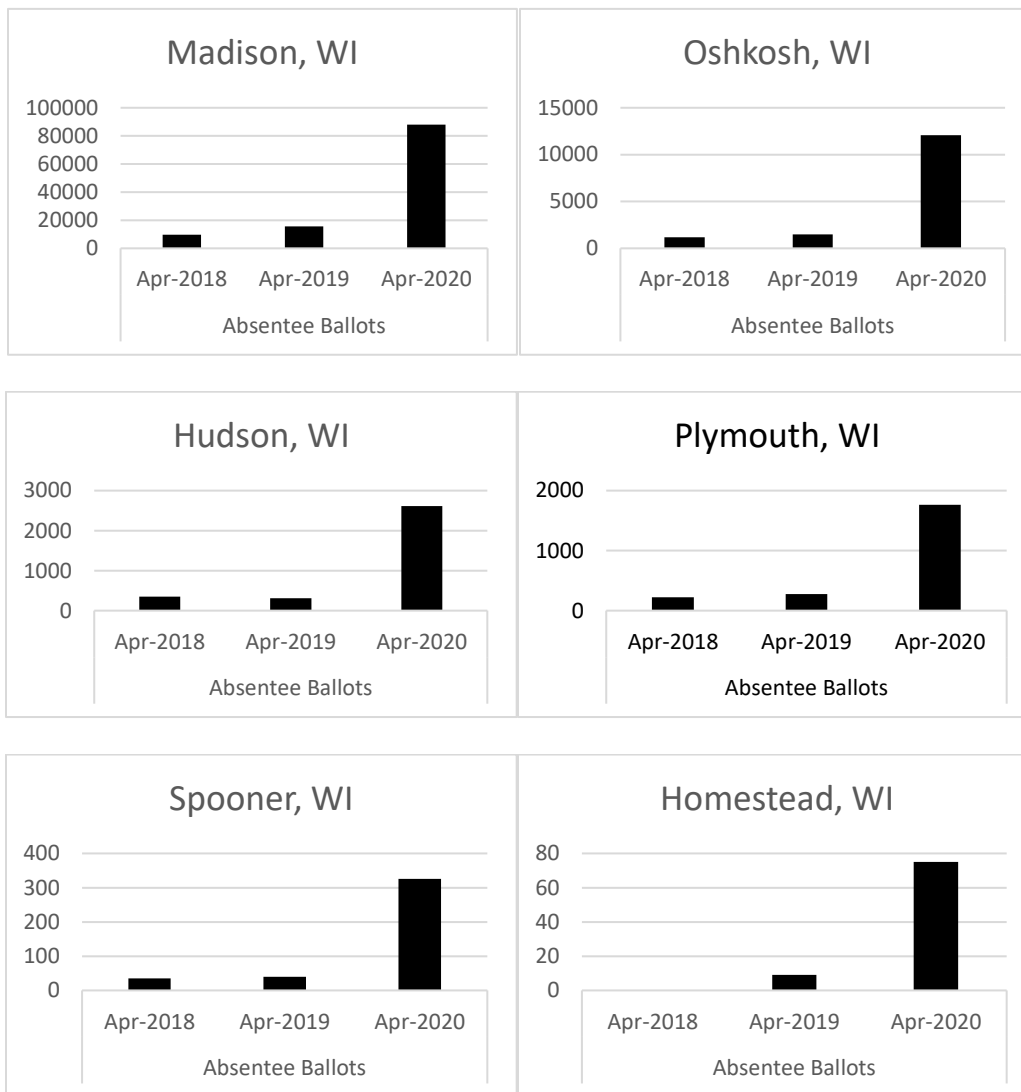
1. Meeting Overwhelming Demand

The most fundamental challenge faced by election officials was simply meeting the unprecedented demand. In addition to keeping up with the requests for mailed absentee ballots, clerks continued to service voters in their office wishing to participate through in-person absentee voting. On top of that, clerks were tasked with providing polling places with equipment on election day to meet appropriate

CDC guidelines, not to mention the challenge of recruiting and training new election inspectors taking the place of long-serving election inspectors, many of whom chose not serve due to their risk category to COVID-19. While meeting the requirements above, clerks had to remain in communication with the WEC on updates and changes applied by all levels of the legal system. Most critically, hundreds of Wisconsin clerks had to complete all the tasks above while working alone and part time.

The increase in demand appeared consistent across the state, with large, medium and small jurisdictions all showing similar patterns.

Table 10.



Rapidly changing guidance further complicated the environment for clerks. Multiple decisions in the weeks leading up to election day required clerks to communicate new deadlines and requirements impacting voters who may have received conflicting information made no longer relevant by late hour court decisions. No city, village, or town was able to avoid these extraordinary challenges presented in

addition to the increased demand for absentee voting – and their efforts navigating all the situations presented by the pandemic should not be overlooked.

For elections prior to the April 7 election, the City of Racine managed ballot requests received by email with just one election staffer who printed and distributed the requests to four additional staff members for entry into WisVote and for the records to be filed according to public records statutes. Once the pandemic hit and absentee request volume grew exponentially, the city quickly adapted by recruiting 20-30 additional city staff members to process absentee ballot requests from printing the request to sending the ballot out the door. Staff are still catching up on filing these documents appropriately.

Some communities, like the Village of Cottage Grove (Dane County), were fortunate to have hired and trained new elections staff just before the pandemic crisis began. Staff were able to manage the demand for absentee ballots by printing off every email notification of an absentee ballot request, whether it required photo ID or not. A staff of three processed each request individually, ensuring the steps of entering the request, issuing the ballot, printing the label, and applying it to the ballot occurred for every printed email. High school students were brought in to assist with the manual work of stuffing envelopes with ballots, while the clerk staff managed work in the voter registration system and fielded calls from voters with limited experience with absentee voting and navigating MyVote. Clerk staff found some success when directing voters to using smartphones (when available) to upload a copy of their photo to complete the absentee ballot request process.

Even the smallest of jurisdictions were not immune from the increased demand. While they did not have to contend with thousands of requests, individual town clerks often worked alone and with limited resources. In the Town of Washington in Shawano County, a part-time clerk went from managing eight absentee ballot requests in February to processing 312 in April. Many clerks were in a similar position of putting in extra hours to scale up their election's operations with no additional compensation, all while balancing a separate full-time job.

To provide clerks adequate time to complete all their election responsibilities, WEC is committed to reducing the administrative burden of data entry required by the current absentee ballot request process. Proposed adjustments to the system include generating a pending absentee request in WisVote that can be approved or denied once photo ID is reviewed. Additionally, WEC hopes to assist clerks with common issues with absentee ballot requests, such as “selfies” submitted as photo ID, by communicating that information back to the voter through MyVote or available email or phone contact information. Finally, the staff recommends conducting voter outreach programs as described in the CARES Grant memorandum associated with this Commission meeting.

2. Concerns about Mail Service

Clerks in some parts of the state encountered issues with absentee ballots reaching voters or being returned to their offices. In some cases, voters expected to receive a ballot when a request was not submitted or not completed. These issues are discussed further under Voter Experience & Education below. After ruling out cases of voter error, there remained cases that could not be explained or could

not be explained definitively. For example, the City of Oshkosh and other Fox Valley communities all reported voters complaining that their ballots were arriving late or not arriving at all. WEC staff investigated each complaint received where enough information was available to identify the voter.

On the morning of April 8, 2020, WEC staff received a telephone call from a Political and Election Mail Coordinator at the Great Lakes Regional office of the USPS in Chicago. The USPS official reported that the post office had located “three tubs” of absentee ballots for the Appleton/Oshkosh area and that the ballots were being processed. The official was unable to confirm how many ballots were in the three tubs but stated that “it could be quite a lot” as they were large two-handled tubs. In a follow up communication, the USPS indicated that there were approximately 1,600 ballots in the batch.

WEC staff attempted to follow up with the USPS to further identify the ballots and determine what happened but did not receive any further information about these ballots. Written inquiries to the USPS did not produce any specific information about these ballots. Wisconsin’s two U.S. Senators have asked the USPS Inspector General to investigate, but WEC staff have been unable to learn anything about the status of the inquiry.

The WEC also investigated reports from the City of Oshkosh suggesting that ballot requests were received but not fulfilled. While many of the cases involved incomplete requests (e.g. no photo ID provided) other records appeared complete. WEC staff researched several dozen Oshkosh area ballot requests that were entirely valid, including those of Assembly Representative Gordon Hintz (D – Oshkosh) and his spouse. The ballot records in question were generated as part of a batch on March 24, and analysis of the ballots associated with it showed that a large part of the batch was not returned by voters. Of the first quarter of records generated, more than 90% were returned. Of the remaining three-quarters of records, less than 1% were returned. This suggests that something happened to the ballots in the latter portion of the batch.

WEC and Oshkosh staff could find no evidence of a technical failure. The Oshkosh batch was produced very quickly by the system (two minutes and seven seconds), did not include any unexpected applications, and occurred during normal operating hours when no system maintenance was underway. Furthermore, the City of Oshkosh Clerk reports with confidence that the ballots were mailed to voters. Thus, in this case, there is no evidence of a system error and no evidence of a printing problem. Instead, one of two events are possible: either a user did not apply the mailing labels to ballot envelopes, or these ballots were bundled together and collectively encountered an issue in the mailing process.

As with the larger cities, smaller municipalities also reported issues with ballots reaching residents or being returned to the clerk in a timely fashion. The Village of Fox Point was among them and experienced an unusual chain of events that garnered some media attention. For two weeks, absentee ballots that were supposed to be mailed to Fox Point residents were repeatedly returned to the Fox Point Village Hall by the post office before reaching voters.

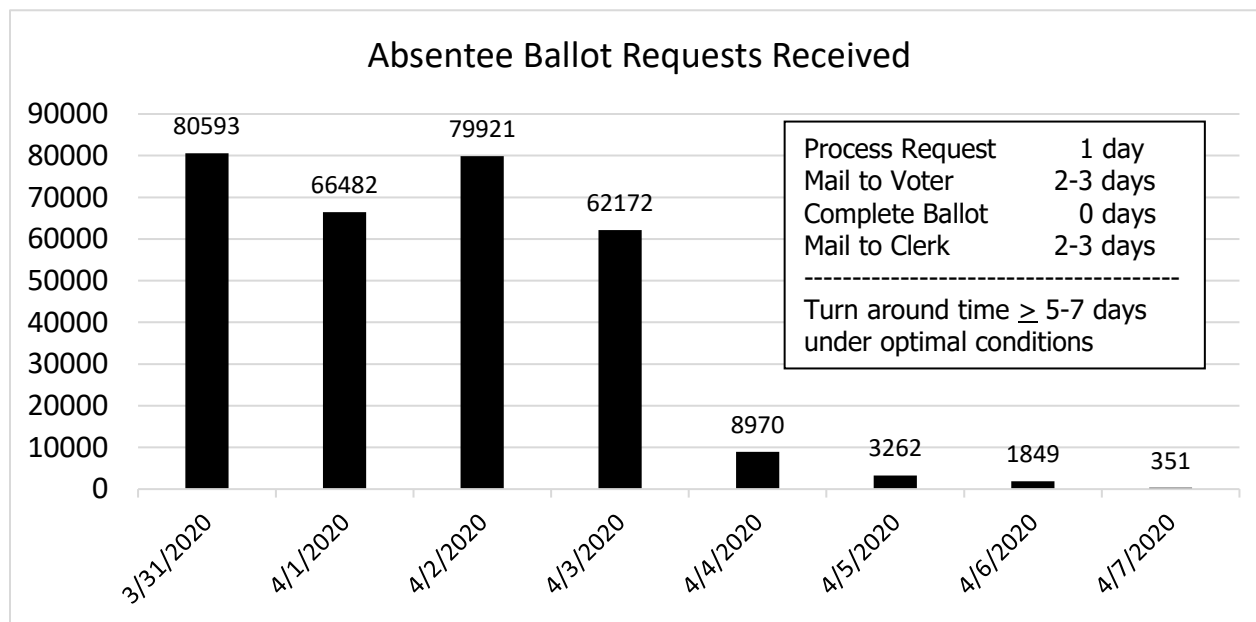
The village reported receiving anywhere from 20 to 50 of these returned absentee ballots per day two weeks ahead of the election. The problem continued to grow as election day neared. In the week prior

to the election, 100 to 150 ballots per day were returned to the village. On the morning of Election Day, Fox Point Village Hall received a plastic mail bin with 175 ballots. In each case, the returned ballots were unopened, unmarked and had not been received by voters. The postage was not cancelled, and no explanation was provided.

Each time they received a batch of absentee ballots, village officials immediately drove the ballots back to the nearest post office. They asked post office supervisors what was wrong with the ballots, but they did not receive any explanation. Fox Point Village Clerk Kelly Meyer reports it is unclear how many voters were affected by the undelivered ballots. Residents who did not receive an absentee ballot in the mail were advised to vote in person at their polling place on Election Day. Residents who called village hall inquiring about their absentee ballot on Election Day could retrieve their ballot from village hall if the ballot still un-sent and the resident could confirm their identity with a photo ID.

Statewide, the volume of absentee requests received remained high in the week prior to April 7th. Clerks received over 60,000 requests alone on the Friday before election day. Even if all these requests were mailed on Saturday, it is unknown how long those ballots took to reach voters. Current capabilities do not permit election officials to monitor the movement of ballots in the mail system. Thus, the next data point available to election officials is the date the completed ballot is returned to them.

Table 11.



The absence of information about ballots in the mail system is a significant concern for voters, clerks, and Commission staff. To improve visibility of these ballots, WEC staff are working to incorporate Intelligent Mail Bar Codes (IMBs) as a tracking tool for future absentee mailings. The IMB is a 65-bar USPS barcode that allows internal tracking information to be shared with the mailer and or recipient.

Although still dependent on the postal service, the IMB allows greater visibility of individual pieces in the mail stream. IMBs and tracking tools are discussed further in the Recommendations section below.

3. Process Improvements

The enormous volume of absentee requests for the April 2020 election magnified the effect of typically small concerns that ordinarily presented minor issues. Complex process flows that were a minor annoyance in prior elections became major headaches for April. Counties faced a particularly difficult challenge of attempting to complete the data entry for multiple relier communities where the absentee voting rates had previously been low. This data entry provides these voters with the opportunity to track their ballot on MyVote.

For example, in Shawano County, the clerk's office typically has three staffers but operated with just two as a result of the pandemic. This reduced staff of just two people was responsible for entering the absentee information for 25 municipalities. The Shawano County staff encountered problems working in the voter registration system, including the inability to pull reports at the county level. Additionally, the ballot count associated to an absentee application does not always immediately update due to allocation of system resources, creating confusion for users looking for confirmation a ballot was created and slowing the processing of information.

Grant County, located in southwest Wisconsin, also provides absentee processing support for its municipalities. Grant County is made up of 52 municipalities, 41 of which rely on the county to enter and update the status of their absentee ballots in WisVote. Previously the volume of absentee ballots was manageable through a simple absentee ballot log passed between the municipality and county. The county clerk's office revamped this absentee ballot log and asked all 41 reliers to stick with the standard format in the weeks leading up to April 7. The log asks for the necessary information to enter it correctly and efficiently in the voter registration system. The county also asks the reliers to highlight any changes from the last time the absentee ballot log had been sent so they could focus on the work to be completed.

Another contributor to processing time is the requirement to individually validate the photo identification of each voter. While validating any one request is quick, the manual nature of the process proved challenging when contending with high volume and simultaneously responding to hundreds of voter inquiries. Compounding the problem was the fact that MyVote shows only complete, accepted requests. Voters with a request pending ID approval are given no indication that their request is on file. Improving feedback to voters, and tools available to clerks, is therefore a top agency priority before the August 2020 election.

4. Technical Problems.

Some voters and clerks have questioned if technical failures caused absentee requests or ballots to be lost. As a result, WEC technical staff spent considerable time researching this possibility both before and after election day. Detailed auditing were performed on individual complaints and no technical problems were detected prior to election day. WisVote and its associated systems maintain meticulous

details of each and every transaction occurring in the system, precisely when it occurs to the fraction of a second, and who or what executed the transaction. These highly detailed records allow staff to retrace events, locate errors, and validate system operations. The records enabled staff to review tens of thousands of transactions from hundreds of jurisdictions. This research revealed one isolated and unique incident where technology and volume combined to create an error. Staff found no evidence of any technical error that could have caused an absentee ballot request or a completed ballot to be lost.

The single failure identified came to light after the City of Milwaukee's Election Commission (MEC) conducted a post election review that could only be identified after election participation was entered. Upon investigation, MEC staff discovered that the WisVote record for tracking this voter's ballot had been created in the middle of the night, at a time when MEC staff would not have been creating ballot records. They further determined that the ballot record was associated with a batch. A batch is a WisVote entity that allows clerks to select broad categories of absentee application records and request the system create ballot tracking records and subsequently generate mailing labels for each of those absentee applications. Many of the absentee ballots associated with this batch had been created in the middle of the night, and many of them had not been returned. MEC referred the issue to the WEC for further investigation during the post-election data reconciliation process.

Upon initial analysis of the batch, WEC staff identified trends that appeared similar to the Oshkosh case. As in Oshkosh, there was a sharp decline in ballot return rates for a specific subset of ballots. Of the 5,913 ballot records created on or before 10:42:32 p.m. on March 22, 5,237 were recorded as having returned in some way to the clerk's office. This is an 88.5% return rate. Of the 2,693 ballots generated after 10:42:32 p.m., only one was recorded as returned.

Further investigation disclosed several factors unique to Milwaukee. In particular:

- It was the largest batch processed by WisVote; ultimately including 8,607 absentee ballot request records. The median batch size for the same day was 32 records.
- It started at 5:16 p.m. on March 22 and did not complete until 1:31 a.m. on March 23. Typically, batches complete within a few minutes.
- Of the absentee application records associated with the batch, many were created **after** the batch was generated. Since the first thing the batch does is select the absentee application records that match its criteria, this should not be possible.

Upon review, it was determined that the timeframe of this particular batch overlapped with maintenance on a known server issue. On March 22, WEC staff observed high utilization rates in some WisVote servers that could potentially cause user interface degradation, such as slow page loads or poor performance of some tasks. In consultation with Microsoft, plans were made to implement server improvements to prevent further issues. In the interim, system resources were freed by restarting the servers that process background jobs, called asynchronous servers. Background jobs are intended to be short-running, and by restarting one server at a time during a period when few users would be interacting with the system, staff believed that WisVote's load balancing would shuffle background jobs as needed and there would be no impact. That has been staff's experience in past server restarts, and in

testing no impact was observed. However on subsequent code review it was determined that it is possible, if a batch workflow is restarted, for that workflow to select applicable ballot requests a second time, which would generate ballot tracking records for absentee applications not originally associated with the batch.

It is staff's belief that an extraordinary confluence of events resulted in additional ballot records being generated after MEC staff printed their mailing labels, leading MEC to believe those ballots had already been sent when in fact they had not. First, Milwaukee's extraordinarily large batch of more than 8,000 ballots, exacerbated by the high user load on the system in the run up to the April election, resulted in the processing of this batch taking several hours, instead of a few minutes. Second, unbeknownst to MEC, Commission staff conducted an unscheduled restart of the asynchronous servers to address an unrelated issue, interrupting this long-running job. Third, an oversight in the development of this process meant that the system failed to handle the restart gracefully, selecting an entirely new collection of absentee applications instead of continuing from where it had been interrupted.

Since the database contained detailed information tracking batch creation, staff could develop precise criteria to determine the impact and review transactions across the state. As a result, staff can conclusively determine that this restart issue only impacted this one batch in the City of Milwaukee. As a result of this issue, staff believes that 2,693 requested ballots were never sent to City of Milwaukee residents. Of the affected voters, 52.5% voted in the election either on a replacement absentee ballot or at the polls on election day.

Ensuring the voting rights of Wisconsin citizens is a hugely complex task without room for error. It requires, at a minimum, the ability to immediately identify and remedy errors before they affect the voting process. In this instance, detailed records enabled agency staff to retrace these events, they did not provide information in a proactive manner allowing a system problem to be identified in real time. Neither clerks nor the state would have been able to identify this issue in real-time or based on single voter reports. Staff are now adopting real-time performance tracking tools for IT professionals and building user-friendly audit tools for clerks and other election officials. Measures to identify and avoid technical failures like this one are discussed in the Recommendations section below.

5. Voter Experience & Education

The April 2020 election introduced hundreds of thousands of voters to the absentee process for the first time. Naturally, many were unfamiliar with the process and did not understand the requirements. Common errors included:

- providing a written request (letter or e-mail) with insufficient information
- submitting a personal photograph instead of an acceptable form of photo ID
- not completing the on-line application process

An additional complication resulted from third parties mailing absentee application request forms that did not adequately highlight the photo ID requirement. In these cases, the clerk was unable to fulfill the

request until they could follow up with the voter to obtain a valid photo ID. Most voters do not provide a phone number or email, so the clerk must rely on a mailed notification to the voter that their request is not yet valid. Clerks in these situations were often unfairly blamed for not fulfilling a request that was not valid in the first place.

WEC staff believes that the creation of voter outreach programs to explain the absentee voting process will be beneficial, particularly if demand for absentee ballots remains high.

IV. Recommendations: Proposed Courses of Action

A. Assessment Resources.

WEC staff is working with various partners to assess and improve the absentee voting experience. Changes to the voter registration system, public facing websites, paper forms, and envelopes will largely impact individuals outside of the agency, and the Commission should provide opportunities to receive and incorporate feedback from our core users.

In addition to the existing Clerk Advisory Committees, a new Clerk Advisory Committee dedicated to Vote by Mail revisions has been created and is meeting on a weekly basis to provide direction and feedback on staff proposals. The committee is composed of clerks from jurisdictions of various sizes and resources. A separate committee dedicated to “reliers” -- clerks who rely on the county or another municipality to complete some or all of their WisVote work -- will also be convened so that new workflows meet their unique needs.

Staff is also working with non-profits in the elections space who are stepping up their efforts to support the nationwide increase in absentee voting. Staff reached out to the Center for Civic Design for guidance on holding and recruiting inexperienced and first-time voters for remote, video conference usability sessions. The Center for Civic Design has previously trained staff on making user-centered design decisions through holding usability sessions, where voters are asked to test-drive new or updated products such as the absentee ballot request form. Staff is in the process of holding remote video conference sessions with voters.

WEC staff is also working with Democracy Works - a nonprofit that builds software applications to assist voters and election officials. WEC has been working with Democracy Works since 2011 in providing our Voting Information Project data feed, which serves as our alternate means for voters to locate Election Day polling places. Ballot Scout is another Democracy Works product that tracks absentee ballots using information from USPS via their Intelligent Barcode and Informed Visibility mail tracking system. Ballot Scout can be inserted as a "widget" or feature into a website like MyVote, allowing voters and clerks to track a ballot as it travels through the USPS mail system.

Since April 23, USPS Election Mail and Business Mail integration experts and WEC staff have been meeting weekly. The focus of these meetings is to provide WEC staff with guidance on the implementation of intelligent mail barcodes and support in absentee ballot envelope revisions. USPS is

committed to building a relationship with our agency with the goal of improving the experience of voting by mail in Wisconsin.

B. Ballot Request Process

Staff, clerks, and voters have provided ample observations on how to improve the absentee ballot request process. Voters are required to submit a written request to their municipal clerk to receive an absentee ballot. Requests can be submitted in a standard format when requested through MyVote and when using the Absentee Ballot Request form (EL-122) or can be submitted in an unstandardized format through an email or mail correspondence. No matter how the voter submits it, any request that gets to the clerk must be entered by hand into the voter registration system. Many first-time absentee voters visited MyVote in the weeks up to the April 7 election to request their ballots where they had to navigate unfamiliar language and requirements such as uploading a photo ID.

In response, WEC staff will focus on three specific improvements to the process of requesting an absentee ballot. First, we recognize that technology and internet is not accessible to all voters. WEC staff is revising the paper Absentee Ballot Request form (EL-122) to be more user friendly and is exploring the opportunity to mail this form to every registered voter without a current absentee ballot request on file for 2020. Additional directions on how to provide a copy of a valid photo ID will be required for this mailing. Second, while hundreds of thousands of voters successfully navigated the absentee ballot request process on MyVote, the process can be improved, particularly in the areas of photo ID upload and confirmation of submission. Finally, information submitted to clerks through MyVote should not require manual data entry into the voter registration system or rely on an email-based process for most users. WEC staff will work with clerks and voters to review new designs before implementation of these three improvements ahead of the 2020 Fall elections.

C. Mailing Process and Ballot Tracking

In its current state, the mailing process for absentee ballot requests allows each jurisdiction flexibility to approach the process in the manner that best meets their needs. As a result, there are situations that lead to less visibility of the ballot's mailing status that may not be ideal. One potential direction for improvements in WisVote is integration of USPS Intelligent Mail Barcodes. Integrating Intelligent Mail Barcodes would allow those who use the Absentee Ballot mailing label features within WisVote to track the delivery status of the absentee ballot.

The USPS has the ability to allow WEC to generate a unique serial number from within WisVote; once the unique serial number is generated, the Absentee Ballot mailing label can be printed using a font that translates the unique number into a bar code used to identify a mail piece as election mail. The bar code also enables scanning and tracking the mail piece as it progresses through USPS facilities. For those who choose to use this function within WisVote once it is developed, clerks will be able to generate and print a label with a barcode that the USPS would then scan once the mail pieces is received at a Postal Service location. Once the mail piece is received, tracking information can be updated as frequently as every hour to track the current location and projected arrival of the mail piece.

With tracking information provided by USPS, WEC can provide specific updates and enhanced transparency into the vote by mail process to clerks and voters. The hope is that with this addition, the number of calls and emails to clerks will be greatly reduced as voters will be able to track their ballot by accessing MyVote or receiving push notifications to an email or phone number. WEC staff is currently evaluating options for integrating this data and evaluating the effects this may have on existing clerk workflows as well as feasibility and timelines.

While evaluating these options and potential for tracking ballots and their return, we are also very cognizant of WisVote relier clerk access to this information and how reliers may be able to obtain the barcode for their mail pieces. This specific topic requires quite a bit more consideration and input from relier community clerks. WEC staff is actively pursuing input from those clerks in order to carefully assess their current workflow and any potential assistance that could be provided by the intelligent mail barcode tracking as well as any potential unintended workflow requirements that may be imposed on those reliers. Integration of tracking via the intelligent mail barcode will increase the transparency of the mailing process for absentee ballots as they are delivered to voters and as they are returned to their municipal clerk.

D. Reports and Audit Tools

Wisconsin's voter registration system serves many purposes for clerks and voters. It maintains the list of registered voters, the set of candidates and contests assigned to specific districts, tracks absentee ballot requests and ballots, houses the data displayed to voters on MyVote, and generally facilitates the administration of elections in Wisconsin. Due to the current pandemic environment, the administration of elections is changing to occur increasingly by mail and the voter registration system must be adjusted to support that shift.

The voter registration system currently offers multiple methods to manage absentee ballot request and ballot records, originally meant to meet the needs of all sizes of communities in Wisconsin. While meant to be helpful, multiple methods can create confusion among clerk staff using different methods within an office and require WEC staff to adequately train and support all methods. As utilization of absentee voting by mail increases all across the state, WEC staff will work with clerks to identify which method to process absentee ballot requests, ballot records, and absentee address labels is best in managing high volumes of absentees and then popularize and train clerk staff on this method.

Staff intends to implement additional tracing procedures and tools to enable early detection of issues such as the batch that restarted in Milwaukee. This will give technical staff greater insight into the internal processes of WisVote beyond what is presently visible in logs and reports and give near-real-time data on system performance in a more meaningful way. In addition, some tools under WEC evaluation can provide certainty that workflows and system processes are behaving as expected after system deployment and provide staff instant notifications if a change is detected.

In response to clerk and voter feedback, WEC staff is investigating numerous methods to improve the immediacy and accuracy of user feedback. In addition to increasing user satisfaction, improved

feedback should reduce the number of incomplete absentee applications from voters and increase confidence from both clerks and voters that requests are being correctly processed, and ballots are sent out timely.

Additionally, WEC staff will create reports to help clerks manage and audit absentee ballot requests and ballots coming into and leaving their office so that they identify issues, anomalies, and ensure all requests are successfully fulfilled and tracked. WEC staff hopes to provide clerk staff the tools to monitor their data so that they can identify and resolve issues. Maintaining and verifying data in the voter registration system database enables our critical role in providing accurate information to voters.

V. Conclusions

The April 7, 2020 election introduced countless challenges that Wisconsin clerks successfully overcame, enabling a record number of voters to cast their ballots through the absentee process. Moreover, the final election data conclusively indicates that the election did not produce an unusual number unreturned or rejected ballots. Despite the overwhelming success of absentee voting as a whole, the experiences leading up to election day were not trouble-free and illuminated several critical areas for improvement. The absentee voting process in Wisconsin can be complex for some users and the current system favors the technically savvy. Voters and clerks would benefit from more information about the status of their absentee ballots, particularly once they enter the mail system. Finally, clerks and WEC staff need more powerful but easy-to-use tools that will enable them to quickly identify and correct problems. The 2020 CARES Act affords Wisconsin the necessary resources to implement many of these improvements, but long-term sustainment will require additional support. With adequate backing, the challenges of April 2020 should ultimately yield voters, clerks, and WEC staff a much-improved absentee voting process.