



Wisconsin Elections Commission

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DATE: June 17, 2020

TO: Wisconsin Municipal Clerks
City of Milwaukee Election Commission
Wisconsin County Clerks
Milwaukee County Election Commission

FROM: Meagan Wolfe
Administrator

SUBJECT: WEC CARES Subgrant Program Announcement

1. **SUMMARY.** Under the Coronavirus Aid, Relief and Economic Security (CARES) Act, the Wisconsin Elections Commission (WEC) was awarded funds on April 6th to help “prevent, prepare for, and respond to coronavirus, domestically or internationally, for the 2020 Federal election cycle.” The WEC produced a plan to distribute a majority of these funds to municipalities through the WEC CARES Subgrant program to help them prepare for the remainder of the 2020 election year.
2. **PROGRAM DESCRIPTION.** The Elections Commission authorized a \$4.1 million WEC CARES subgrant program for municipalities to offset pandemic-related elections costs. The approved WEC CARES Subgrant program provides a \$200 base amount plus an additional \$1.10/per registered voter. This means that if a municipality has 100 registered voters, the municipality will receive the base \$200 plus \$1.10/per those 100 registered voters. That total amount the municipality would receive is \$310.00.
3. **AUTHORIZED USES.** The WEC CARES Subgrant is for pandemic-related expenditures for the 2020 elections. The following are the allowable uses under the WEC CARES Subgrant:
 - (1) **ADDITIONAL BALLOT SUPPLIES, PRINTING, AND POSTAGE COSTS** for higher levels of absentee or vote by mail processes, including printers, scanners, and envelope openers costing less than \$5000 per unit.
 - (2) **ADDITIONAL CLEANING SUPPLIES, CLEANING SERVICES AND PROTECTIVE EQUIPMENT** including additional disinfectants, wipes, paper towels, deep cleaning services for polling places pre- and post-election, masks, gloves, gowns, face shields, plexiglass, thermometers and other equipment for staff and poll workers’ virus protection for in-person absentee voting sites, election day polling places and absentee central-count locations.
 - (3) **ADDITIONAL STAFFING** for processing of higher levels of absentee ballot requests and absentee ballot tabulation, resulting in expanded hours, overtime, and associated benefits costs

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for election staff and poll workers or unbudgeted temporary election staff or poll workers and for additional staffing for cleaning polling locations and creating other protective measures.

- (4) **ADDITIONAL MAILINGS FOR PUBLIC COMMUNICATION** of changes in registration, absentee ballot request options, or voting procedures, including information on coronavirus precautions being implemented during the voting process.
 - (5) **ADDITIONAL ABSENTEE DROP-BOXES**, installation, and security.
 - (6) **ADDITIONAL SPACE LEASING** for new polling places when existing sites are closed or relocated due to the pandemic.
 - (7) **ACQUISITION OF ADDITIONAL EQUIPMENT** necessary to process the higher volume of absentee ballots. This includes new automated letter opening equipment, paper folding machines, high speed or central count tabulators, and mobile IT equipment. (This "Equipment" category defined as costing equal or greater than \$5000 per unit. Equipment costs less than \$5000 should instead be reported under the applicable category above, most likely Additional Ballot Supplies. Additional reporting and documentation are required for allowable equipment purchases as outlined in the Code of Federal Regulations, Title 2 section 200.33. (2 CFR § 200.33))
4. **DOCUMENTATION & REPORTING.** Municipalities are asked to document all election pandemic-related expenses from January 20, 2020 to November 30, 2020 that fall under the seven categories above. These expenses can be tracked on the WEC CARES Expenditure Tracking template that will be provided by WEC Staff. Documentation includes anything that provides information on the purchase, such as receipts, invoices, payroll reports, etc. and explanations and justifications of how claimed expenditures qualify as pandemic related.

There will be a required check-in for municipalities between the August and November elections due on September 15, 2020. For this check-in, the WEC financial staff requires all municipalities that accepted funds to return a copy of the WEC CARES Expenditures Reporting template to elections.finance@wi.gov. This report will cover all claimed expenses under the four above categories from January 20th, 2020 to September 1st, 2020. The check-in report is to help clerks receive any guidance or ask any questions as it will relate to the final report due December 1st, 2020. WEC staff wants to ensure that clerks feel comfortable tracking expenditures and with the reporting requirements before the final deadline.

The final report due to the WEC will consist of an updated and complete WEC CARES Expenditures Reporting template from the September 15th check-in. The completed report will cover the entire January 20th, 2020 to November 30th, 2020 time period and is due December 1, 2020. This is an important deadline. If a report is not received by December 1, 2020, the jurisdiction may be required to return all subgrant funds received. Only the completed WEC CARES Expenditure Report template needs to be submitted; all receipts, invoices, and other documentation should not be submitted but must be maintained on file until December 30th, 2024.

5. **WHAT IF I NEED SOMETHING ELSE?** The WEC CARES Subgrant is a one-time subgrant award to help offset the additional costs that have been and will be incurred as they prepare for elections impacted by the COVID-19 pandemic. Please note that the State of Wisconsin will supply municipalities with cleaning supplies and protective equipment ahead of the August and November elections. If municipalities still have election related costs in those categories, those can be submitted to FEMA or Routes to Recovery for further reimbursement. As well, we have worked with the Department of Administration to understand their Routes to Recovery subgrant to ensure our subgrant compliments theirs and provides municipalities with the maximum access to available funds. Our recommendation is to focus your WEC CARES Subgrant funds toward preparing for the August and November elections as these are funds received immediately after the signed WEC CARES Agreement has been received by the WEC. As well, the WEC CARES Subgrant will cover all election-related pandemic expenditures until November 30, 2020, even if they have not been paid out by December 1, 2020. Per DOA guidance, the Routes to Recovery Grant will be a reimbursement of expenses already paid through October 30, 2020. For further information on the Routes to Recovery grant please go to <https://doa.wi.gov/Pages/LocalGovtsGrants/COVID-Grants.aspx>.

6. **HOW DO JURISDICTIONS APPLY?** Clerks must read, sign, and return the WEC CARES Subgrant Agreement and Certification form to elections.finance@wi.gov. These agreements need to be returned to WEC no later than September 1st, 2020. Subgrant awards will be issued as signed agreements are received. If you require a paper agreement be mailed to you, please contact the WEC Helpdesk at (608)261-2028.

7. **IMPORTANT DATES?** Below is a table of the important deadlines to remember:

Date	Description
January 20, 2020	Reporting period begins
September 1, 2020	Deadline for agreement
September 15, 2020	Check-In Due to WEC
November 30, 2020	Reporting Period Ends
December 1, 2020	Final WEC CARES Expenditure Report Due to WEC

8. **QUESTIONS?** If you have any questions or concerns please email the WEC Financial Team at elections.finance@wi.gov or call the WEC Helpdesk at (608)261-2028.

WEC CARES Subgrant Expenditures Reporting Template

Check-in Due September 15, 2020, covering January 20 - September 1, 2020
 Final Report Due December 1, 2020, covering January 20 - November 30, 2020

Receiving Jurisdiction's Name and County:

Authorized Representative of Jurisdiction:

Additional 2020 Election Expenditures, due to the Pandemic:

Do NOT list expenditures that will be subsidized by another federal grant (e.g. FEMA, Routes to Recovery) or for supplies that WEC has provided.
 All bills/invoices do NOT have to be paid by November 30, 2020, but the expenses need to be incurred by that date to qualify under the subgrant.

Total Claimed Pandemic-related Election Expenditures	Ballots Supplies, Printing & Postage	Cleaning & Protective Equipment	Additional Staffing	Public Communications	Absentee Ballot Drop-Boxes	Additional Space Leasing	Equipment (with costs > \$5000 per unit)

TOTAL
0

Please complete the yellow areas above and submit by September 15, 2020 and then by December 1, 2020 to the WEC at: elections.flh@wec.org
 Questions may also be directed to the above email.

WEC CARES FAQs

1. How has the subgrant changed since the webinar?

The only change that has occurred for the WEC CARES Subgrant program is that clerks no longer need to document expenses outside what they receive for the subgrant award. Clerks will only need to document those expenses they are using the subgrant towards. Municipalities are then free to submit their other pandemic-related expenditures to other subgrant/reimbursement programs, for any expenditures that are not already being claimed under this subgrant.

2. Where did we come up with the \$1.10? If it is due to postage, why are they not receiving the funds for both future elections to cover both sets of postage costs?

We had originally conceived of and presented to the Commission a \$2.6M postage-based subgrant that would allocate funds based on a \$1.10/per registered voters * % expected turnout * % expected by-mail absentee requests for the August and November elections. However, this current \$4.1M subgrant expands the amount awarded because it is 100% of \$1.10 for each registered voter, not then lowered by expected turnout percentage and again by expected percentage of those being absentee.

This increased subgrant program, up \$1.5M since the postage-based iteration, should allow municipalities to supplement both absentee and in-person voting pandemic-related costs.

3. Can this money only be used for the August and November elections?

No, these can be used towards all 2020 elections for pandemic related expenses. At this time though, none of us are sure what the August and November elections will look like, and we recommend ensuring you are prepared for them before using the funds for past expenses.

4. If we believe the subgrant funds won't cover the extra expenses for the next two elections, is there a possibility of additional funds?

This is the only opportunity that the Commission has approved for CARES federal funds to be distributed to municipalities. For extra expenses outside the WEC CARES allocation, please research the FEMA and Routes to Recovery Grants as they will also assist with election-related expenses incurred due to the Pandemic.

5. Can counties receive funds? If not, what is a good response for the Provider/Relier relationship we want explained.

No, counties are not eligible to receive the WEC CARES Subgrant as it is a municipality based program.

6. What type of equipment/supplies are covered?

Equipment that is necessary to process the higher volume of absentee ballots is allowable. This could include new Dymo and regular printers, automated letter opening equipment, high speed or central count tabulators, and necessary additional laptops and mobile IT equipment.

Equipment costs equal or greater than \$5000 per unit should be tracked under the "Equipment"; unit costs less than \$5000 should instead be reported under the applicable category above, most likely Additional Ballot Supplies.

Plexiglass/Sneeze guards and thermometers for use in the elections as protection against the pandemic are all allowable and would be categorized under Cleaning/PPE.

7. Do we need to provide additional proof of purchases to WEC with the WEC CARES Expenditure Report?

No. (Please don't.) But you are required to have documentation for all reported expenditures and to retain this documentation until December 31, 2024, in case of audit.

8. What staffing expenses can be covered? Would only additional needed staff be covered, outside the usual number scheduled to a polling place?

Additional election expenditures due to the pandemic are all allowable. Additional staffing for the processing of higher levels of absentee ballot requests and absentee ballot tabulation, as overtime and benefits costs for election staff and poll workers or temporary election staff or poll workers as well as hazard pay (within reason) are allowable.

All staffing expenditures being claimed must have documentation that justifies how that expenditure is additional and due to the pandemic. That documentation might include a comparison to the presidential elections in 2018 for the number of absentee ballot requests and processing or staffing time and/or documentation of time spent on pandemic-specific tasks such as cleaning polling places, setting up social distancing, and other additional safety measures.

9. In order to appropriately plan the use of funds, do we know what supplies and when they will be provided by WEC again through the \$500,000 commission approved? Do we know anything about NG Troops coming in to assist again?

The Commission approved \$550,000 for WEC to procure and disseminate sanitation supplies to municipalities for the August and November elections. We expect the supplies will be similar to what was previously received (sanitizer, spray bottles, isopropyl wipes, surgical masks, gloves, pens, painters tape, signage). Once again, WEC staff intends to coordinate this effort through the county clerks. They should be expecting a communication from us soon asking them to reach out to their municipalities to gauge the amount of supplies each municipality will need. Please respond to your county clerks timely and remember to take in

to account the number of polling places you will have open (and the number of poll workers) to accurately order supplies, especially the PPE (masks & gloves). WEC staff will work with the State Emergency Operations Center to procure and disseminate supplies to county clerk offices by the end of July. We hope that having the supplies in advance will help better prepare.

As it relates to the assistance of National Guard Servicemembers for August and November, please do solely rely on this option. While we have been able to get approval from the Governor and the Adjutant General for assistance during the April and May elections, WEC staff encourages clerks to continue to solicit volunteers through your communities. While none of know what the rest of the year will look like as it relates to Coronavirus, we will continue to monitor the need for poll workers as we approach each of the elections. Should a serious need arise, it is possible for WEC staff to request assistance from the National Guard, but please remember that we do not have any control over whether the request will be approved, and if it is approved, how many servicemembers will actually be available to assist with the mission.