



1-844-DIS-VOTE
www.disabilityvote.org

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Re: Comments on Scope Statements

To: Wisconsin Election Commission

From: Wisconsin Disability Vote Coalition

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Thank you for the opportunity to comment on the scope statements under consideration today. These comments are provided on behalf of the Wisconsin Disability Vote Coalition and are informed by our work on the frontline, supporting voters with disabilities and older adults to have equitable access to voting.

Related to the Statement of Statement of Scope: Training for Election Inspectors and Special Voting Deputies

Because of the decentralized nature of Wisconsin elections, there is wide variation in the content and amount of training for Election Inspectors/ poll workers. As a result, some poll workers are unfamiliar with the rights of voters with disabilities and the accommodations they are entitled to by law, such as to have an assistor of their choice complete their ballot, to access curbside voting, to use an accessible voting machine, or be accommodated with the requirement to speak their name and address. We have received calls to the DRW Voter Hotline and reports in surveys from voters who have been denied these accommodations and whose rights have been violated, due to inadequately trained poll workers.

Current requirements for poll worker training are minimal. Wisconsin statutes require that election inspectors receive training at least once every two years. * [§7.315\(1\)\(b\)](#), Wis. Stats. The municipal clerk must provide this training and should document that the inspectors have been trained.

To ensure poll workers understand voting regulations and voter rights, the Disability Vote Coalition recommends that new poll workers be required to complete training on

core competencies **before** serving. This requirement could be met by completing the Wisconsin Election Commission Election Inspector training. In addition, poll workers should be required to attend a minimum of one training program annually thereafter. We recommend the scope statement be modified to add a mechanism to track whether poll worker training requirements are being met.

Training topics should include voter rights, accessibility, accommodations for voters with disabilities, disability awareness and etiquette, as well as training regarding the broad range of documents that can be used as proof of residence and as photo ID for voting.

Special Voting Deputies should be required to complete the standard poll worker training, as well as additional training specific to SVDs to ensure they understand the rights of voters in care facilities, accommodations that are within the limits of assistance permitted by election laws, and are sensitive to the specialized communication needs of some residents. Training should address how to communicate with individuals with sensory disabilities, as well as cognitively impaired individuals. The American Bar Association guide [*Assisting Cognitively Impaired Individuals With Voting*](#) provides helpful guidance.

Statement of Scope: Approval and Security of Electronic Voting Equipment and Ballot Security

During the WEC's June 11, 2019 meeting, the Commissioners noted a significant gap in the pre-election voting equipment testing process: accessible voting equipment is not currently required to be tested during the pre-election testing. Therefore, it is unclear if ballots marked using accessible voting equipment are being run through tabulators to ensure they are accurately being marked and read in advance of the election. At that meeting, the Commissioners took a vote to require testing of accessible voting equipment as part of the pre-election equipment testing. It is unclear if that directive was codified into formal guidance or an official rule.

DRW and other Disability Vote Coalition members have heard multiple concerns from voters regarding accessible voting machines and some of our members have experienced this personally. In some cases, the machines are not turned on; others are not working and were not tested on election day. We recommend including this requirement in an administrative rule. We ask Commissioners to incorporate pre-election testing of accessible voting equipment in the statement of scope related to Approval and Security of Electronic Voting Equipment and Ballot Security.

SS 010-22 Polling Place Emergency Planning

The Disability Vote Coalition ask Commissioners to ensure the administrative rules for Polling Place Emergency Planning include sufficient rigor to avoid a repeat of polling place consolidation that occurred in 2020 during the pandemic. We were contacted by many voters with disabilities who were impacted by the polling place consolidation. Many were unable to wait in line for hours and were not able to cast a ballot due to these barriers. Others struggled to identify their polling place and had gone to the wrong location; in some cases, lack of transportation did not allow them to get to their new polling place which was at a greater distance than in the past.

We recommend establishing standards that will ensure this type of polling place consolidation does not occur again. Each municipality should be required to develop an emergency plan including back up locations, mechanisms for notifying voters of the changes, and requirements to retain polling locations in areas reasonably close to voters' regular polling places. In addition, municipalities cannot be allowed to consolidate so many polling places that voters have difficulty accessing those locations, and/or that unreasonably long lines ensue. Emergency plans should be tracked and submitted to WEC for review; this should include review of polling place accessibility requirements.

SS 008-22 Certification and Training of Municipal Clerks

The Disability Vote Coalition supports the drafted scope statement related to the Certification and Training of Municipal Clerks. Clerks play a lead role in administering our elections, and it is of utmost importance that they be fully trained before conducting their first election and remain current as election law and equipment continue to change. Training of clerks is critically important to protect the security of our elections.

Thank you for your consideration of our suggestions, and for your work to ensure our elections are accessible and inclusive of voters with disabilities.

About the Wisconsin Disability Vote Coalition

The WDVC is a non-partisan effort to help ensure full participation in the entire electoral process of voters with disabilities, including registering to vote, casting a vote, and accessing polling places. Members include people with disabilities, and community agencies. The Coalition is coordinated by Disability Rights Wisconsin and Wisconsin Board for People with Developmental Disabilities.