



Wisconsin Elections Commission

212 East Washington Avenue | Third Floor | P.O. Box 7984 | Madison, WI 53707-7984
(608) 266-8005 | elections@wi.gov | elections.wi.gov

2020 HAVA CORONAVIRUS AID, RELIEF AND ECONOMIC SECURITY (CARES) SUBGRANT PROGRAM

WEC CARES SUBGRANT AGREEMENT, TERMS AND CERTIFICATION

The purpose of this agreement is to certify that my jurisdiction will use the CARES Subgrant funds solely for costs incurred due to the pandemic affecting the 2020 federal elections and in accordance with the Code of Federal Regulations (CFR) Title 2, and the Wisconsin Election Commission's (the Commission's) documentation retention and reporting requirements.

I. ALLOWABLE USES

Purpose and Use of Funds. The CARES Act makes clear that grant funds are for ADDITIONAL costs associated with the national emergency related to coronavirus and are to be spent *"to prevent, prepare for, and respond to coronavirus, domestically or internationally, for the 2020 Federal election cycle."* Additional costs are those incurred outside of the jurisdiction's budgeted costs for the 2020 federal elections or those costs that are solely incurred due to the pandemic. For the purpose of this subgrant, those allowable uses span the period **January 20, 2020 through November 30, 2020** and include the seven following categories:

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, as expanded hours, overtime, Hazard Pay and associated benefits costs 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.

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Administrator
Meagan Wolfe

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 below referenced CFR sections.)

Per the Code of Federal Regulations, Title 2 (2 CFR) §200.33:

“Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000. See also §§200.12 Capital assets, 200.20 Computing devices, 200.48 General purpose equipment, 200.58 Information technology systems, 200.89 Special purpose equipment, and 200.94 Supplies.”

II. DOCUMENTATION, AUDIT, AND REPORTING

DOCUMENTATION: The receiving jurisdiction must maintain all documentation of purchases made using subgrant funds provided by this subgrant until December 31, 2024. Documentation includes receipts, invoices, payroll reports, etc. and notations to document that claimed expenditures are due to the pandemic.

A standard inventory list of all items purchased using subgrant funds must be created and maintained by the jurisdiction for purposes of any state or federal audit. Such original purchasing documentation and inventory lists shall be retained by the receiving jurisdiction until the WEC authorizes destruction of said records.

AUDIT: All subgrant funds are subject to audit by the Commission and/or the federal government to ensure funds have been spent appropriately and in accordance with all applicable state and federal laws.

Pursuant to Wis. Stat. § 5.05(11), if the federal government objects to the use of any funds provided to a municipality under the subgrant, the municipality shall repay the amount of the subgrant to the Commission.

REPORTING: September 15, 2020 and December 1, 2020. A Check-In is due September 15, 2020 that covers the period of January 20, 2020 – September 1, 2020. The final report is due December 1, 2020, covering January 20, 2020 – November 30, 2020. By those two deadlines, all receiving jurisdictions must complete and submit to the Commission the WEC CARES Subgrant Expenditures Reporting template for the corresponding period reporting the total pandemic-related election expenditures claimed in the seven categories listed below and detailed above:

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1. **Ballots/Ballot Supplies/Printing/Postage**
2. **Cleaning Supplies & Services / Protective Equipment**
3. **Additional Staffing**
4. **Public Communications**
5. **Absentee Ballot Drop-Boxes**
6. **Additional Leasing**
7. **Equipment**

III. TIMELINES

- **EXPENDITURE PERIOD:** January 20, 2020 – November 30, 2020. Allowable expenses must have been incurred between January 20, 2020 through November 30, 2020. 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.
- **SUBGRANT AGREEMENT RETURN DEADLINE:** September 1, 2020. The Commission will expedite the disbursement of funds as the agreements are received. Commission staff will award subgrants as a \$200 base subgrant plus an additional \$1.10 per registered voter as of June 1, 2020. Subgrant allocation is within the sole discretion of the Commission staff administering the subgrant program. Subgrant funds may be received through electronic transfer to a jurisdiction's shared revenues account (if available) or a physical check may be sent to a jurisdiction's shared revenues location. For questions related to the processing of subgrant checks, please contact the Commission's financial team via the WEC Help Desk at (608) 261-2028 or elections.finance@wi.gov
- **PANDEMIC EXPENDITURE REPORTING DEADLINES:** Check-In September 15, 2020 and Final Report December 1, 2020. The jurisdiction's final report of all sufficiently documented pandemic expenditures in the seven categories listed in Section II of this agreement, is due December 1, 2020. This deadline allows the Commission's financial staff to meet its federal grant reporting deadlines, therefore it is important for jurisdictions to file the final expenditure report on time. The Commission will provide to participating jurisdictions a template report, and the jurisdiction will fill in the seven total expenditure amounts for the seven categories in Section II of this agreement. 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. The same report is to be used for the September 15, 2020 Check-In but covering the period of January 20, 2020 – September 1, 2020.
- **RETURN OF UNUSED FUNDS:** December 15, 2020. Jurisdictions must return any unused subgrant funds by December 15, 2020. Also, if a jurisdiction fails to submit a Pandemic Expenditure Report by December 1, 2020, the jurisdiction may be required to return all subgrant funds received.

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IV. CERTIFICATIONS

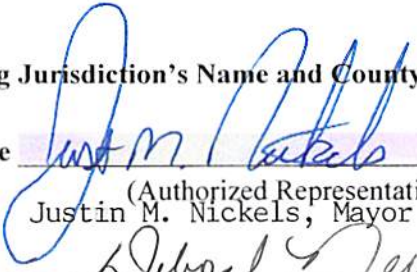
Federal and State law require jurisdictions receiving subgrants to certify that they will comply with the terms of the subgrant. By signing and returning this agreement, your jurisdiction certifies the following:

- As the receiving jurisdiction, we certify that we will solely use the WEC CARES Subgrant funds for costs incurred due to the pandemic affecting the 2020 federal elections.
- As the receiving jurisdiction, we certify that we do or will have the necessary processes and systems in place to comply with the reporting requirements.
- As the receiving jurisdiction, we will maintain all documentation of purchases made using subgrant funds provided in this subgrant until December 31, 2024.
- As the receiving jurisdiction, we will return any unused funds by December 15, 2020.
- As the receiving jurisdiction, by September 15, 2020 and December 1, 2020 we will submit to the Commission a simple report of the total expenditures in the seven categories detailed above: 1. Ballots/Ballot Supplies/Printing/Postage, 2. Cleaning/PPE, 3. Staffing, 4. Public Communications, 5. Absentee Ballot Drop-Boxes, 6. Space Leasing/Polling Place Relocation, and 7. Equipment.
- As the receiving jurisdiction, we further certify that we will follow all state and federal laws, including adherence to all applicable federal requirements including Office of Management and Budget (OMB) guidance: Title 2 C.F.R. Subtitle A, Chapter II, Part 200-Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 C.F.R. § 200) found here: (<https://www.govinfo.gov/app/collection/cfr/2019/>)

V. SIGNATURE

Please enter your name and the date of certification below to certify the above and *return via your official email address to elections.finance@wi.gov.*

Receiving Jurisdiction's Name and County City of Manitowoc, Manitowoc County

Signature  Date June 17, 2020

(Authorized Representative of Jurisdiction)
Justin M. Nickels, Mayor


Deborah Neuser, City Clerk

Date June 17, 2020

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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 relates 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 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.

Deborah Neuser

From: Kathleen McDaniel
Sent: Wednesday, June 17, 2020 2:03 PM
To: Deborah Neuser
Cc: Steve Corbeille
Subject: RE: WEC CARES Grant

No objections, approved as presented.



Kathleen M. McDaniel
Manitowoc City Attorney
900 Quay Street, Manitowoc, WI 54220
(920) 686-6990 | kmcdaniel@manitowoc.org

From: Deborah Neuser
Sent: Wednesday, June 17, 2020 1:34 PM
To: Kathleen McDaniel
Cc: Steve Corbeille
Subject: WEC CARES Grant
Importance: High

At the last Council meeting, Council authorized Mayor and Clerk to sign the agreement upon review by City Attorney. The agreement is attached. Please advise if you approve so I can proceed with the signatures and we can receive approx.. \$19,000 in grant funds. Thank you.



Deborah A. Neuser
City Clerk, WCMC, City of Manitowoc
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