

Council of Elections Officials

*120 N. Washington Square, Suite 110
Lansing, Michigan 48823*

May 21, 2008

US Election Assistance Commission
1225 New York Avenue NW, Suite 1100
Washington, DC 20005

Dear Commissioners:

The Michigan Council of Election Officials (CEO) supports Commissioner Caroline Hunter's proposal to modify the EAC Advisory 07-003-A, which created a local government Maintenance of Effort (MOE). The CEO is an organization representing the Michigan Association of County Clerks and the Michigan Association of Municipal Clerks. In total CEO represents over 1,600 county, city, townships and village election officials.

In Michigan, the Secretary of State has not directly disbursed HAVA funds to the counties, cities and townships. Michigan election officials received voting systems and other services from the Secretary of State to fulfill Michigan's requirements under HAVA.

In reviewing EAC Advisory 07-003-A, we conclude that an excessive burden is being placed on election officials. The Advisory's stated policy is to insure that county and local governments are not replacing county and municipal funds with HAVA dollars. The simple fact is that we have not received any HAVA dollars; therefore, it is impossible to replace local funds with HAVA dollars. The Advisory does not comport with the reality of how HAVA has been administered in Michigan.

We estimate that compilation of local government MOE's would entail thousands of hours of election officials' time right in the midst of an extremely busy election year. To require Michigan election officials to partake in a pointless exercise is not in the best interest of either election administration in Michigan or the Election Assistance Commission.

Please correct the Advisory by supporting Commissioner Hunter's proposal on May 22, 2008.

Sincerely,


Mary Hollinrake, Chair
Kent County Clerk/Register


Ann Ulrich, Vice Chair
Hartland Township Clerk