

Administration Volume  
Certification Section

Voter Registration (ER 3.02700)

ER# 3.02700

Authority PL 103-31 (National Voter Registration Act of 1993 (NVRA)), Section 115.162 RSMo, WC-94-22-P, and WC-95-01-P

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**POLICY:** The Local WIC Provider (LWP) shall provide adult applicants, participants and authorized representatives with the opportunity to register to vote at certification, recertification and any time a change of address is reported.

The LWP shall document "register to vote" status in MOWINS at certification, recertification and any time a change of address is reported.

The LWP shall retain the voter registration tally sheet and original/copy of the declination forms for 24 months.

**PROCEDURES:**

- A. The LWP shall offer voter registration services to individuals who are at least 17½ years of age applying for WIC benefits for themselves or on behalf of an infant or child (in which case, he or she acts as an authorized representative) at certification, recertification and when reporting name or address change. The LWP staff shall notify the participants/authorized representatives that applying or not applying to register to vote will not affect their WIC benefits. The LWP shall also provide voter registration applications to any persons present in the office who request them.
1. The LWP staff must orally ask the participants/authorized representatives "if you are not registered to vote where you live now, would you like to register here today?" The LWP must complete or update the "Register to Vote" feature in the demographics screen in MOWINS by checking the response "provided voter register application" in the drop down box and provide the application to the participant/authorized representatives.
  2. For participants/authorized representatives who respond "yes, I want to register", or when the participant reports a change of name and/or address, the LWP staff will assure the participant/authorized representatives check the "YES" box on the back of the Missouri Voter Registration Application (also referred to as the declination section of the application). Make a copy of the back page of the form for the agency's central file, and give the participants/authorized representatives the Missouri Voter Registration Application.
    - a. Encourage the participants/authorized representatives to complete the application on-site. The participants/authorized representatives may take the registration application home to complete and mail the completed application directly to their local election authority or bring the completed application to the LWP at their next clinic visit.
    - b. LWP staff must provide the same amount of assistance to an individual completing the voter registration application as they would to an individual

completing the WIC forms.

- c. Inform the participants/authorized representatives that registration approval notification will be mailed to them from their respective local election authority.
  - d. The participants/authorized representatives must fill in all boxes on the Missouri Voter Registration Application. The LWP staff should review the application to ensure that it is complete and legible.
3. For participants/authorized representatives who respond that they do not wish to register or simply state "no" or "no, I am already registered", the LWP staff will assure the participants/authorized representatives check the correct box (either "NO" or "NO, already registered at current address") on the back of the Missouri Voter Registration Application. The participants/authorized representatives must sign on the designated space on the back of the declination section of the form. If the participants/authorized representatives refuse to sign, the LWP staff shall put "declined to declare", then initial and date. Keep the original signed forms in the agency's central file.
  4. For participants/authorized representatives who indicate that they do not want to register to vote because they are ineligible or for any reason, the LWP staff will assure the participants/authorized representatives check the "NO" box at the back of the Missouri Voter Registration Application. The participants/authorized representatives must sign on the designated space on the back of the declination section of the form. If the participants/authorized representatives refuse to sign, the LWP staff shall put "declined to declare", then initial and date. Keep the original signed forms in the agency's central file.
  5. For participants/authorized representatives who decline to mark any box, the LWP staff will record on the declination form the date and the fact that s/he declined to declare a preference regarding voter registration services. The LWP staff will sign the form.
  6. The LWP shall forward all completed applications with "YES" response to the proper local election authority weekly. Contact person and mailing address for each local election authority can be found at the Missouri Secretary of State web page. Mailing costs associated with transmission of the registration applications to the local election authority are allowable WIC costs. Voter registration applications may be delivered to the local election authority in person, rather than mailed. The LWP do not need to make copy of the completed applications. The LWP shall keep a tally of the total number of voter registration applications that they send to the local election authority's office weekly (within 5 days). Enter zero (0) on the tally sheet for the week(s) that the LWP do not receive any completed applications. This tally sheet shall be maintained for monitoring purposes.
  7. Participants/authorized representatives must be offered Voter Registration services even when the previous certification shows they are already registered to vote. This is an opportunity to ask about and document changes in address, name, etc.
  8. A flow chart detailing the steps required to comply with the NVRA and this policy is attached.
- B. LWPs are encouraged to continue to make voter registration applications available in public areas such as waiting rooms.

- C. The LWP staff must not:
1. Attempt to influence a participant's political preference or party registration;
  2. Display any information or literature on political or party affiliation;
  3. Attempt to discourage a participant from registering to vote; and
  4. Lead the participant to believe that the decision to register or not register to vote will affect the availability of program services or benefits.
- D. The terms of the policy will be integrated into the WIC clinic in a manner that minimizes burden and is least disruptive to WIC program procedures.
- E. The State Agency shall provide training materials to the LWP in order to ensure uniform application of the law and this policy. The LWP shall assure new employees can competently perform all duties related to voter registration at the time they are required to perform them. The LWP is required to provide **designated** new staff with NVRA training within six (6) months of the date of hire or rehire. The LWP must also train **designated** staff annually using the provided training materials. Refer to [ER# 1.01550](#) for LWP training documentation requirements.
- F. The WIC Coordinator shall act as the NVRA liaison or appoint a staff to act as the NVRA liaison with the local election authority in their service area. The WIC NVRA liaison shall be responsible for training new employees, periodically observing clinic staff to ensure the requirements of NVRA are understood and met and ensuring an adequate (e.g., 4 month) supply of registration applications are available at all clinic sites. The LWP must use the Missouri Voter Registration Application provided by the State. Additional applications can be ordered from the DHSS warehouse.
- G. The LWP must retain the voter registration tally sheet and the original/copy of the declination section of the applications in the agency's central file for 24 months. The LWP should file the declination sections of the application by month.
- H. The State Agency shall oversee and monitor LWPs for compliance with the NVRA and the provisions of this policy. For the State Agency's monitoring policy and procedures refer to [ER# 1.05500](#) (State and Local WIC Provider Monitoring Process).
1. The State Agency will review the self-monitoring form submitted by the LWPs annually. The local agency self-monitoring will include a review of the number of voter registration applications sent to the local authority and the total number of declination forms in the agency's central file for a specific month.
  2. The State Agency will also review the tally sheets and declination forms during the on-site monitoring visit.
  3. At any time, the State Agency can request a tally of the application and responses to the declination forms for any month. The LWP will have 15 business days to provide the tally.
  4. MOWINS will include a "Register to Vote" feature in the demographics screen, as described in A1 of this policy. LWP staff may not bypass the voter registration question; the voter registration question must be answered in order to proceed with certification/recertification.

- I. The National Voter Registration Act implementation guide can be found on the Secretary of State website.

### Steps Required to Comply with NVRA Policy

**WIC staff must perform the following steps at every certification, recertification, and address change request:**

