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bcc

Subject MOE

To Whom it May Concern,

Please find the Commonwealth of Pennsylvania's comments on the EAC's proposed policy changes for MOE. Please let us know if you have any additional questions or should you require additional follow-up.

1. No Comment
2. No Comment
3. No Comment
4. No Comment
5. No Comment
6. The Commonwealth of Pennsylvania has a concern with this particular point because we use lower tier expenditures for MOE and they are not derived from a state appropriation. The Commonwealth of Pennsylvania would like to use expenditures of county funds to maintain MOE if they are not derived from a state appropriation. If this is not the case, the Commonwealth of Pennsylvania will need to create a new plan for meeting the MOE requirements moving forward.
7. The Commonwealth of Pennsylvania has included all of these activities as well as others to establish its MOE.
8. No Comment
9. No Comment
10. The Commonwealth of Pennsylvania submitted an MOE plan after the 2006 federal audit and a 2007 state audit.
11. No Comment
12. No Comment
13. No Comment
14. The Commonwealth of Pennsylvania's MOE obligation is based on the county MOE obligations, as result counties must meet their MOE annually to reach state compliance.
15. No Comment
16. No Comment
17. Currently, the Department of State maintains a record of the amounts that are committed from each of the county's HAVA plans on an annual basis. However, the Commonwealth does not have a breakdown of what activities are included. We have worked in conjunction with each of the counties to develop their plans by using the total number of their expenditures for election and voter registration related expenses for the 1999 and 2000 fiscal years. At this point, it may be difficult for the Commonwealth of Pennsylvania to go back and have the counties establish new baseline MOE and breakdowns by activity for the 1999/2000 fiscal years.
18. No Comment
19. Our Comments on bullet 17 are relevant to this issue as well.
20. No Comment
21. No Comment
22. No Comment
23. No Comment
24. No Comment
25. No Comment
26. No Comment

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