

Fiscal Impact of Certain Election Administration Bills Under Consideration in the Georgia General Assembly

OVERVIEW

The Georgia General Assembly is considering a slate of election administration bills this session that would have significant financial and operational impacts on county and state election offices. To support stakeholders engaging in the legislative debate, see the following independent fiscal analysis of key policy proposals that are actively under consideration. These bills would:

- require voters to submit a photocopy of an ID or other documentation to request an absentee ballot ([SB 67](#) & [HB 531](#));
- ban or limit the use of secure ballot drop boxes ([HB 531](#) & [SB 68](#));
- limit the advance voting schedule ([HB 531](#));
- ban supplemental election funding ([HB 531](#));
- end automatic voter registration (AVR) at the Department of Driver Services ([SB 69](#)); and
- trigger costly litigation ([HB 531](#), [SB 67](#), etc).

This memo is intended to be a helpful, interim guidepost as stakeholders await official fiscal notes from the state. The key policy proposals listed above could **cost Georgia over \$57 million in the next election cycle**. The vast majority of these costs would fall on counties and would recur each election cycle – making elections less efficient and cost-effective over the long-term.

A combined summary of costs per policy proposal are below, followed by a detailed methodology overview.

Combined Cost Estimates of Election Policy Proposals

Policy & Effect	Statewide Costs Per Election Cycle
Cost of Absentee Ballot Request ID	6,740,391.71
Voter Registration System Updates	\$1,336,815.23
Secure Storage for Personal ID Documents	Undetermined additional cost
Issuing Free Identification Documents	\$940,365.92
Diverted Absentee Voters to In-Person	\$846,418.56
Voter Education	\$3,616,792.00
Cost of Personally-Monitored Dropboxes	\$1,067,584.00
Cost of Advance Voting Schedule Changes	Undetermined additional cost
Cost of Banning Supplemental Election Funding	\$32,907,599.00

Cost of Repealing AVR	\$4,518,020.18
Registrations Diverted to Paper and Online	\$3,897,038.94
Manual Voter List Maintenance	\$383,436.90
Undeliverable Mail	\$127,600.42
Provisional Ballot Use	\$5,943.92
Materials and System Redesign	\$104,000 (one time cost)
Temp. Staff to Process High Vol. Registrations	Undetermined additional cost
Longer Lines at Polling Places	Undetermined additional cost
DDS Staff Retraining	Undetermined additional cost
Cost of Litigation	\$12,000,000.00
Total Estimated Fiscal Impact	\$57,233,594.89

I. FISCAL IMPACT OF REQUIRING ABSENTEE BALLOT APPLICATIONS TO INCLUDE IDENTIFICATION DOCUMENTATION

Georgia legislators have sponsored multiple bills that would require voters to include a photocopy of an ID or a driver's license number when requesting an absentee ballot, including [HB 531](#) and [SB 67](#). This provision would generate costs, including: changes to the state voter registration system, a redesign of absentee ballot application materials, staff retraining, public education, the provision of additional free ID cards, management of more in-person voters. In total, we estimate the proposed ID requirement for absentee voting would cost **\$6,740,391.71** in the next election.

Estimated Cost of Requiring Absentee Ballot Applications to Include ID Documentation

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Secure Storage for Personal ID Documents	Undetermined additional cost
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Total	\$6,740,391.71

Costs of Voter Registration System Updates

Georgia would need to push updates to its central voter registration system in order to implement an ID requirement for absentee ballot applications. This includes programming new data entry fields, adding new prompts for election workers, and increasing data storage capacity to save scans of voter ID documents. When Wisconsin enacted its ID requirement for absentee ballot applications in 2011, the [fiscal note](#) for the bill estimated that updates to the statewide voter registration system would cost \$1,131,000 (in 2011 dollars), including both system

modifications and user testing. Adjusting for inflation, this software update could cost Georgia **\$1,336,815.23** (converting February 2011 dollars to January 2021 dollars using the [Bureau of Labor Statistics calculator](#)).

Note that we were unable to estimate costs for additional, secure data storage needed to accommodate an influx of photo ID files. In 2020, Wisconsin had to significantly adjust the storage capacity of its voter registration system to accommodate the file size of photo ID images submitted by voters applying for absentee ballots. According to a 2020 report from the [Wisconsin Election Commission](#), “[m]ultiple increases of memory were needed to keep pace with absentee requests and attached copies of photo ID’s...Photo files are very large, therefore the storage and capacity in WisVote had to be significantly adjusted.” Additionally, Georgia election officials may need additional physical storage capacity and security to safely store physical copies of photo IDs submitted by absentee ballot requestors. This likely cost is also not included in the above estimate, but is notable.

Cost of Issuing Free Identification Documents to Eligible Voters

DDS offers [free IDs](#) to all eligible voters who currently lack one and wish to vote absentee. Because HB 531 creates challenges for would-be absentee voters without a DDS-issued ID or access to a printer or photocopier, the bill will increase voter uptake of the free voter ID option.

[Kentucky's SB 2](#) enacted last year included a fiscal impact analysis showing the provision of free IDs could cost the state up to \$3,620,000. This number will likely be lower in Georgia, since the state already has in-person photo ID requirements (unlike Kentucky), but the costs would likely still be significant. In 2011, [Indiana](#) reported spending \$13/free voter ID card.

Georgia had 7,233,584 active registered voters in 2020. If we assume that just 1% of those voters wish to vote absentee each election cycle and do not possess an updated ID card, the cost to the state would be **\$940,365.92** ($7,233,584 * .01 * \13).

Cost of Diverted Absentee Voters

HB 531 creates an additional step for Georgians seeking to vote absentee, which will likely divert a portion of voters to an in-person voting option—which is typically more expensive to administer. In [Colorado](#), after implementation of mail voting, counties' average costs per vote decreased from \$15.96 to \$9.56, a difference of \$6.40. This suggests that transitioning a voter from mail to in-person voting would result in an increased cost for counties of \$6.40 per voter. [1,322,529 absentee ballots](#) were cast in Georgia in 2020, out of 4,999,960 total votes. If we assume the changes proposed in HB 531 cause 10% of absentee voters (330,632 voters) to vote in person, the increased cost of in-person voting for counties would be **\$846,418.56**.

Cost of Voter Education

HB 531 would require state and local election officials to undertake a significant voter education effort to ensure interested absentee voters understand the new ID requirements. Again, when Wisconsin enacted an ID requirement for absentee ballot applications, the bill's [fiscal note](#) estimated a \$1,150,000 public education campaign. Notably, Wisconsin has roughly half the

population of Georgia, and this estimate is in 2011 dollars, so we do not rely on that figure as an analog for Georgia (but merely include it as an example).

We estimate that Georgia counties would need to spend \$0.50 per voter when conducting due diligence public education on new absentee ballot application rules. With 7,233,584 active registered voters in the state, this would amount to **\$3,616,792** in total voter education costs. Sample county-level estimates are shown below based on current active registered voter data from the [SOS website](#) (dated Feb. 8, 2021).

Sample County Fiscal Impact: Voter Education on New Absentee Ballot Request Rules

County	Active Registered Voters	Cost of Voter Education	Total Extra Cost
Chatham	209,000	\$0.50	\$104,500.00
Cherokee	194,402	\$0.50	\$97,201.00
Dougherty	63,534	\$0.50	\$31,767.00
Floyd	61,944	\$0.50	\$30,972.00
Fulton	819,937	\$0.50	\$409,968.50
Lowndes	77,262	\$0.50	\$38,631.00

II. FISCAL IMPACT OF PERSONALLY-MONITORED DROP BOXES

HB 531 would require ballot drop boxes to be constantly monitored (by a poll worker, police officer or security guard), located inside advance voting locations, and available only during advance voting hours. Based on [data from the SOS](#), Georgia counties offered advance voting at approximately 313 different locations ahead of the 2020 General Election. Based on a sampling, each voting location was open for approximately 16 days for about 9 hours a day. That amounts to about 45,072 hours of early voting statewide (313 locations * 9 hours/day * 16 days). A resource from [National Vote at Home Institute](#) estimates that the average election worker is paid \$16/hr. [Police officer](#) compensation is significantly higher, (the average officer salary in Atlanta converts to a rate of \$28.92/hr). Using these figures as a range, we estimate the average labor cost for dropbox security at \$22/hr.

Relying on a \$22/hr wage for security, it would cost counties approximately **\$3,168 to staff a single dropbox throughout early voting**, if we assume the location is open for 9 hours a day for 16 days (\$22 * 16 days * 9 hours). Statewide, this would amount to **\$991,584 per election**, assuming counties place one dropbox in each of the 313 early voting sites (\$22 * 16 days * 9 hours * 313 drop boxes). Note that Georgia purchased 332 dropboxes with accompanying video surveillance equipment in 2020, for approximately \$4,000 each. (Secretary Raffensberger offered [\\$3,000 grants](#) to counties to offset 75% of the cost of purchasing a single drop box and accompanying security equipment, meaning an average of \$4,000 per drop box.) If Georgia did not use its remaining 19 dropboxes, that would amount to a wasted investment of \$76,000. Therefore, the total cost of this requirement in the next election would be **\$1,067,584**.

****By contrast, SB 68 proposes to ban the use of ballot dropboxes outright, which would constitute a wasted investment of \$996,000 statewide (332 * \$4,000).*

III. FISCAL IMPACT OF ADVANCE VOTING SCHEDULE CHANGES

Imposing a uniform advance voting schedule across Georgia limits county flexibility to allocate resources based on local need – increasing costs and lowering efficiency. States like [North Carolina](#) that have enacted laws limiting statewide early voting to specific dates and times have faced significant pushback from counties, with under-resourced, rural counties suffering the most from the lack of flexibility. Limiting popular early voting windows will also push a higher number of people to vote on Election Day, contributing to long lines and adding strain on election systems and workers.

It was not possible to estimate a precise cost for this provision without detailed early voting data from counties (i.e. rate of early voting by day/time per county). However, local election officials must be given the opportunity to weigh the county budget implications of HB 531's advance voting rule changes and to share their findings with the Georgia legislature.

IV. FISCAL IMPACT OF BANNING SUPPLEMENTAL ELECTION FUNDING

Counties bear significant financial responsibility for administering elections, but they do not always receive enough state and federal funding to meet local needs. For the November 2020 General Election and 2021 Senate Runoffs, at least [43 Georgia counties](#) received grants and private funding from non-governmental organizations to support successful administration. [Cherokee County](#) received \$765,293 in outside funding, [Dougherty County](#) received \$300,000, [Fulton County](#) received \$10,698,831, and [DeKalb County](#) received \$9.4 million. While there is no comprehensive record of all nonprofit funds that supported Georgia's elections, prohibiting this funding source in future elections could have devastating consequences for secure county election administration and for voters.

Taking Cherokee County's grant as a rough average, HB 531 (and HB 62) would have cost Georgia counties approximately **\$32,907,599** in needed election funding last cycle (\$765,293 * 43 counties).

V. FISCAL IMPACT OF REPEALING AUTOMATIC VOTER REGISTRATION

(Note that repealing AVR is not included as part of HB 531.) According to the Georgia Secretary of State, over 5 million Georgians have registered to vote via AVR at the Department of Driver Services (DDS) since the policy was implemented in September 2016. In addition to boosting registration rates in Georgia, AVR has saved counties significant time and money by reducing paper-based registration, allowing for continuous voter list maintenance, reducing undeliverable mail, and decreasing provisional ballot use.

Repealing AVR, per HB 69, would negate the cost-savings enjoyed by counties in recent years, and would require significant operational and technological changes within DDS, the SOS's

office, and counties. [Election Administration and Voting Survey](#) (EAVS) data from Georgia shows that **repealing AVR could cost the state at least \$4,518,020.18 per election cycle.**

Estimated Cost of Repealing AVR in Georgia

Effect of AVR	Statewide Costs Per Election Cycle
Registrations Diverted to Paper and OVR	\$3,897,038.94
Manual Voter List Maintenance	\$383,436.90
Undeliverable Mail	\$127,600.42
Provisional Ballot Use	\$5,943.92
Materials and System Redesign	\$104,000
Temp. Staff to Process High Vol. Registrations	Undetermined additional cost
Longer Lines at Polling Places	Undetermined additional cost
DDS Staff Retraining	Undetermined additional cost
Total	\$4,518,020.18

Cost of Additional Paper Registration Forms

Processing paper voter registration applications is labor-intensive and expensive. Among other steps, the process includes data entry, following up with applicants on missing information or errors, and paying overtime and additional temporary staff to process applications in a timely fashion before Election Day. Previous research shows that counties spend [on average \\$4.72 processing a single registration form](#), and that there are significant savings from election administration changes that eliminate paper-based forms, like AVR.

In the 2018 EAVS data (when AVR was in effect), of the total registration forms processed in Georgia, 79.95% were submitted at DDS (through AVR), 7.95% were submitted online, and 8.52% were submitted by paper (mail or in-person). By contrast, in the 2016 data from before AVR was in effect, of the total forms processed in Georgia, 44.77% were submitted at DDS, 21.70% were submitted online, and 23.67% were submitted by paper (mail or in-person). If AVR were repealed and these splits return to pre-AVR levels, costs for paper and online transactions would have increased as follows.

Assuming the same number of total forms as 2018 (an extremely conservative estimate given population growth), that would mean 4,498,331 forms submitted per election cycle. Without AVR, the number of paper forms would increase by 681,497 (.2367 - .0852 (4,498,331)). Relying on research estimates that [processing each paper form costs \\$4.72](#), this results in an increased spending of \$3,216,665.84 on additional paper forms. Similarly, without AVR, the number of online registrations increases by 618,521 (.2170 - .0795 (4,498,331)). Relying on research estimating the [cost of each online transaction at \\$1.10](#), this results in increased spending of \$680,373.10 on online forms. Together, the increased processing costs on paper and online registration forms from AVR repeal are **\$3,897,038.94** per election cycle.

Broken down at the county level, the costs are still massive. Here are the total number of forms processed in six counties in 2018, according to the EAVS data, along with the anticipated extra registration costs per election cycle if AVR were repealed. Without AVR, election officials would also receive overwhelming influxes of paper registration forms immediately before elections, when staff capacity is already stretched thin. This would likely prompt counties to hire additional temporary staff—a cost that is not included in this estimate but is worth noting.

Sample County Fiscal Impact: Voter Registrations Diverted to Paper & OVR

County	2018 Forms	Extra Paper w/o AVR	Cost of Extra Paper	Extra Online w/o AVR	Cost of Extra Online	Total Extra Cost
Chatham	166,549	25,232	\$119,095.04	22,900	\$25,190.00	\$144,285.04
Cherokee	109,075	16,525	\$77,998.00	14,998	\$16,497.80	\$94,495.80
Dougherty	47,210	7,152	\$33,757.44	6,491	\$7,140.10	\$40,897.54
Floyd	24,961	3,782	\$17,851.04	3,432	\$3,775.20	\$21,626.24
Fulton	610,203	92,446	\$436,345.12	83,903	\$92,293.30	\$528,638.42
Lowndes	52,564	7,963	\$37,585.36	7,228	\$7,950.80	\$45,536.16

Costs from Manual Voter List Maintenance

According to the EAVS data, in the 2016 election cycle, before implementation of AVR, Georgia counties sent 1,026,062 confirmation notices to identify voters who may have moved. By contrast, in the 2018 election cycle, after implementation of AVR, Georgia counties sent only 478,295 confirmation notices. It makes sense that AVR would significantly lower confirmation mailers. When hundreds of thousands of additional voters update their addresses at motor vehicle offices each year, counties do not need to undertake list maintenance efforts to confirm a potential move based on non-voting, postal records, or other third-party data. Repeal of AVR would lead to significantly more confirmation notices each election cycle, each costing counties money for printing, processing, and postage (not to mention prepaid return postage required by federal law). If we assume a return to pre-AVR levels for confirmation notices, and conservatively estimate costs of \$0.70 per mailer to account for postage, labor, and printing, Georgia counties would spend an additional **\$383,436.90** each election cycle ($\$0.70 \times (1,026,062 - 478,295)$).

Costs from Rise in Undeliverable Mail

AVR also saves money by reducing undeliverable election mail. More updated address information from the DMV ensures that election mail reaches the correct address, saving election officials the cost of mailers sent to obsolete addresses. According to EAVS data, in the 2016 election cycle, 26.4% of confirmation notices were returned undeliverable. By contrast, in the 2018 cycle, after AVR was adopted, only 15.3% of these notices were returned undeliverable. Again, this makes sense. Better address data from motor vehicle transactions means that fewer confirmation notices are going to out of date addresses and more are reaching voters based on inactivity. If AVR repeal results in a 42% increase in undeliverable mail generally (since 26.4% is 42% greater than 15.3%), election officials would bear significant additional costs. Lets conservatively assume as a baseline that 2% of election mail sent to all

active registered voters is returned undeliverable. (According to 2018 EAVS data, 0.82% of mail ballots were returned undeliverable in 2018, and these ballots are only sent to voters who affirmatively requested them, suggesting a higher total for mail sent to all active registrants.) A 42% increase in undeliverable mail over this 2% baseline would mean that for a mailer sent to all 7,233,584 active registered voters, an additional 60,762 mailers would be returned undeliverable ($[(2 * 1.42) - (2)] * 7,233,584$). And assuming conservatively that a county sends at least three election mailers per cycle, we can roughly estimate that AVR repeal would create an additional 182,000 mailers sent to obsolete addresses. Again, assuming these materials cost roughly \$0.70 per mailing, this would mean a cost of **\$127,600.42** per election cycle in unnecessary undeliverable mail due to AVR repeal.

Cost from Increased Provisional Ballot Use & Long Lines

Similarly, AVR also reduces rejected provisional ballots as a share of the voter population. A substantial share of rejected provisional ballots are cast by voters with registration issues, i.e. voters who are not registered or whose registration is out of date. With AVR in place, more voters become registered or have their addresses updated to the appropriate precinct prior to election day, rendering rejected provisional ballots unnecessary. In 2016, rejected provisional ballots represented 0.17% of the active registered voter population, while in 2018, they dropped to 0.15%. Georgia had 7,233,584 active registered voters for the 2020 election. If we assume a 5.62% increase in this population by 2022 based on historical trends, this total rises to 7,640,111. And if we assume that an extra 0.02% of these voters would cast rejected provisional ballots if AVR were repealed, that would result in an extra 1,528 rejected provisional ballots. Estimates [from Arizona](#) put the cost of processing each provisional ballot at \$3.89, due to labor, printing, and verification costs. Assuming similar costs in Georgia, AVR repeal could cost Georgia counties an additional **\$5,943.92** next election cycle on unnecessary provisional ballots.

Relatedly, higher provisional ballot use caused by an AVR repeal will also lead to longer lines at polling places. In the absence of AVR, hundreds of thousands more voters will be unregistered or have out of date address information. These voters will either need to update their information at the polls (in the case of certain address updates) or cast a provisional ballot, slowing down the process for everyone else and costing voters time and money. Even if every Georgia voter who had to vote in-person had to wait just an additional 30 seconds due to these delays, the costs to Georgia's economy are massive. Consider that average hourly earnings in Georgia are \$27.92. Just losing 30 seconds of time across the approximately 3,680,000 Georgians who voted in person in 2020 would mean lost productivity of \$856,213.33 ($\$27.92 / 120 * 3,679,806$). While this fiscal estimate does not include lost productivity costs associated with long lines, the burden to Georgia's economy and the added strain on election officials is notable.

Materials and System Redesign

Georgia's DDS handles approximately [3.7 million license and ID](#) transactions per year. Given the massive quantity of license and ID forms, redesigning these forms to eliminate AVR will impose additional expenses. Even if redesigning the forms to eliminate AVR and discarding all

the forms that are currently in use only costs the state a mere two cents per form, that would still cost \$74,000. Similarly, the state would have to re-program its interface for online and computerized transactions. Programming to modify the language in Colorado's DMV transactions when it adopted AVR cost [the state \\$60,000](#). Even if we assume the programming costs for removing AVR from DPS electronic transactions are only half of that, that would still be an additional \$30,000 in spending. Thus, the total cost of materials and system redesign could reach or even exceed **\$104,000**.

Additionally, DDS frontline staff across Georgia would require retraining in order to implement an AVR repeal. While there was no clear way to develop an appropriate estimate for this cost, this would likely be a significant expense and logistical undertaking.

VI. FISCAL IMPACT OF LITIGATION

Key provisions of HB 531 (and other House and Senate bills) – including changes to absentee ballot request rules, early voting schedules, dropbox availability, and polling places – will inevitably trigger litigation. Laws mirroring HB 531 enacted in other states have resulted in massive attorney's fees for the state. In 2016, federal courts struck down as racially discriminatory a North Carolina law with very similar provisions, such as changes to early voting schedules (including elimination of Sunday voting), a ban on out-of-precinct provisional voting, and increased photo identification requirements. As part of the judgment against North Carolina, [the state was required](#) to pay plaintiffs' attorneys fees and costs of \$5,922,165.28. Similarly, after Texas's photo ID law was successfully challenged, the [state was required](#) to pay plaintiffs' attorneys fees and costs of \$6,790,333.31. A lawsuit against Georgia challenging this bill is likely to result in attorney's fees in the same range, not to mention the costs state attorneys must spend defending the law, which are likely to be equally high. Thus, by passing this law Georgia is creating costs of at least \$6 million dollars, and potentially exposing itself to another \$6 million in attorney's fees should it lose, for a total cost of **\$12 million**.