

Council Memo



To **City Council**
Service Area Corporate Services
Date Tuesday, May 28, 2024
Subject **Clarification on Municipal Election Voting Methods Information**

Committee of the Whole was presented with the [2026 Municipal Election Alternative Voting Methods and Accessible Voting Service Enhancements staff report](#) on May 7, 2024. During discussions at the meeting, questions were asked by members of Council and this memo is intended to provide further information and clarification.

School board engagement

School boards were not included as community stakeholders during the voting methods and accessible voting service enhancement engagement process. The goal of that engagement process was to meet and hear perspectives from stakeholders that the City Clerk’s Office did not have an ongoing relationship with.

Appreciating that school boards may have feedback regarding election accessibility and voting methods, staff have reached out to the local school boards that the City acts as the returning office for, the Upper Grand District School Board (UGDSB) and the Wellington Catholic District School Board (WCDSB), to ensure they have the ability to comment, submit correspondence or delegate to Council on May 28, 2024 should they wish.

Financial impacts and possible service level reductions to in-person voting

Should Council adopt the resolution to add internet voting as an alternative voting method, in addition to vote by mail and vote from home, this will be a notable service level increase with additional financial and staffing resources required to deliver.

Following the 2022 municipal election, [staff identified financial and staffing capacity challenges](#) to maintaining service levels for future elections. The inclusion of a third alternative voting method would further strain staff workloads during an election and cannot be supported with existing staffing levels. As a result, additional funding for a one-year contract position at a cost of \$120,000 is required in order to implement internet voting in addition to vote by mail without reducing service levels in other areas of the election. This amount is staff’s best estimate at the time of writing this report and is subject to change based on salary inflation and benefit allocation adjustments into 2026.

Similarly, page 11 of the post-2022 election report noted that current budget allocations were no longer able to cover all election costs due to inflation in the cost of goods and services, an increase in the number of voting methods and the number of voting days and locations. An increase to the annual election reserve transfer was approved through the 2024 – 2027 multi-year budget process to maintain existing service levels.

To be clear, staff are indicating that either internet voting or vote by mail could be covered with existing financial and staffing resources. However, to offer both for the first time, it is challenging to anticipate rates of use in addition to in-person voting and therefore more resources are needed to ensure appropriate planning, service delivery and that final costs can be covered.

A summary of anticipated costs for each voting method was shared as part of [Attachment-3](#) to the May 7, 2024 staff report. Those costs were based on a standard number of 10,000 users to demonstrate equivalence of cost. These numbers have been revised below based on more accurate estimates of use if vote by mail, vote from home and internet voting are approved as alternative voting methods together for 2026. It is challenging to estimate the price of these methods as costs depend on how many voters use the service. The below is estimated based on past use levels to the best of staff’s ability at this point in time.

Vote by mail

Service or product	Number of units	Costs/resources	Notes
Vote by Mail Kits	500	\$0	Kits remaining from 2022 can be re-used.
Vendor Services		\$13,750	Vendor platform used to request, track, audit and adjudicate mail in ballots when returned.
Postage to send mail kits		\$955	Postage rate of 0.93 cents per mailed envelope to send and 0.98 cents for pre-paid postage to return.
Tabulator		\$1,150	Regular tabulator to tally results of this method separately from in-person results.

Internet voting

Service or product	Number of Units	Costs/resource s	Notes
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Internet voting system	10,000 to 20,000	\$16,000 to \$32,000	Vendor estimate for 2026.
External testing		\$20,000 to \$40,000	Range from penetration testing to threat risk level testing.

Total Estimated Costs Vote by Mail (VBM): \$14,750 to \$15,855.

Total Estimated Costs Internet Voting (IV): \$36,000 - \$72,000.

Total cost anticipated for both - \$50,750 - \$87,855.

Based on the above estimates, an additional \$50,000 to add a voting method is needed in addition to the increased staffing costs.

Increasing the service level for the 2026 municipal election to include internet voting will require Council to approve additional one-time funding. The total budget increase needed, including one contract staff position and voting methods costs, is \$170,000. If online voting is added as a service level increase for the 2026 election, City staff respectfully request that the Mayor and City Council approve an increase in funding to the election reserve as part of the 2025 budget to ensure that funding is available at the time of procurement and agreement completion.

The City Clerk must ensure that the election budget can support the cost of a regular election, by-elections, and post-election processes such as recounts and compliance audits. If Council approves the addition of internet voting as a third alternative voting method without a corresponding increase in budget, the City Clerk will have no alternative but to reduce service levels related to in-person voting. This is within the City Clerk's statutory authority and is the only service that could be reduced to cover the amount required. A \$170,000 reduction to in-person voting in 2026 would require a reduction to the number of voting locations by half. In 2022, there were 46 in-person voting locations. To capture the amount of money required to offer all three services, without a budgetary increase in 2025, staff would need to reduce the number of in-person voting locations to 23 total on Election Day. Advanced polls would also be reduced by half from two weekends at multiple locations across the City to only one location and for three days. All remaining in-person locations would have to reduce staffing levels by one to two positions as well.

This would be a significant reduction in service levels for voters choosing to vote in-person and would run counter to the Future Ready Strategic Plan Foundations pillar to Provide Excellent Service. If Council approves internet voting as an additional alternative voting method, a corresponding budget increase in the one-time amount of \$170,000 is necessary by 2025.

Vendor market considerations

Following the Committee of the Whole meeting, a further market assessment of internet voting vendors was conducted. This was informed by discussions with other municipalities who have conducted recent Requests for Information (RFI's) in this space.

With the removal of Dominion Voting and Scytll from the market, the two longest standing vendors in the Ontario market will be unavailable in 2026. This leaves four remaining vendors that staff are aware of. These include Smartmatic, Intelivote, Simply Voting and Voatz. Three of these vendors have conducted municipal elections in Ontario before, however, one failed to respond to City staff's previous request for a quote to support the development of the staff report presented at the May 7, 2024 Committee of the Whole meeting; indicating there may not be interest in bidding for future procurements.

Two vendors currently meet base security requirements that would allow internet voting to be offered similar to 2014. These require integration with the City's voters' list database to offer two-step registration and live voter strike-off at the time an online ballot is cast. This ensures a voter must verify their identity with information on the voters' list before they can mark a ballot and, after voting online, that a voter cannot access another voting method to vote more than once. The City's voters' list database provider has indicated that new integrations are not planned ahead of 2026. These requirements would be part of a procurement process.

Staff note that the same considerations of limited vendor market and integration requirements would apply and be similarly challenging for a vote by phone method which would be offered by the same vendors as internet voting and even more of a challenge for Remote Accessible Vote by Mail (RAVBM) with only one vendor we are aware of in the market that has never been tested in Canada. In summary, it is estimated that there remains two to three vendors in the current market that would respond to any formal procurement call with the level of rigor that would be required by staff and any formal request for proposals.

Satisfaction of the Clerk

Clarification was requested regarding how staff would interpret the "to the satisfaction of the City Clerk" wording included in the Committee of the Whole recommendation with regard to selecting an internet voting vendor.

Should Council approve the use of internet voting, staff will take this as an acknowledgement and acceptance of the risks posed by that alternative voting method. It would also be seen as an acknowledgement and acceptance, on the part of Council, that the dependability, reliability and verifiability concerns raised by staff are seen as tolerable. In light of this acknowledgement and acceptance, staff would focus on ensuring that the vendor platform was as secure and dependable as possible. This would be done by:

- Referring to the draft [online voting standards](#) in development.
- Consulting with other municipalities who have and/or are planning to offer this method to see what their requirements are.
- Considering any recent municipal election audit review recommendations from other municipalities, such as the City of Hamilton.
- Receiving bids on a request for proposals (RFP) process from vendors that can meet established requirements.

- Working with an independent vendor to conduct security testing, from penetration testing up to threat risk assessment, of the online voting system and verifying that any issues identified are addressed and resolved.

Timing implications

Election procurement is currently planned for 2025. Security testing would likely take place between January and March 2026. In the event that no viable bids are received on an RFP for internet voting services, or if security testing revealed issues that do not meet requirements to the Clerk's satisfaction and could not be addressed in time for the 2026 election, staff would put a by-law forward for Council to rescind approval of an internet voting method. If this was necessary following procurement, a by-law would likely be brought forward in Q1 2026. If this was necessary following testing, a by-law would be brought forward as soon as possible in Q2 2026 ahead of the May 1, 2026 deadline under the Municipal Elections Act (MEA) to approve alternative voting methods.

Staff are concerned with the late timing of potential by-law changes given that the election website will be live and media attention and corporate communications will have started. Staff are reviewing whether the full 2024 workplan can be updated to begin the procurement process earlier, however, this cannot be guaranteed. Staff need to assess other operational, legislative and Council priorities to determine if they could be delayed. These include items such as supporting hybrid Council meetings, completing Freedom of Information requests or developing a lobbyist registry.

Potential by-election implications

In the event of a by-election in advance of 2026, the alternative voting methods approved by Council for 2026 would not automatically be approved for use. Staff would bring forward a report and by-law based on what methods could be offered based on timing and legislative requirements of a by-election. Given the time constraints for internet voting procurement and testing noted above, any impacts of a by-election on preparations for the 2026 regular election would have to be reviewed and reported at the time to reflect the specific circumstances. The financial impacts of a by-election are unknown at this time and would have to be considered in the context of increasing service levels, if approved by Council, ahead of 2026.

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