

COMMITTEE ON LEGISLATIVE RESEARCH  
OVERSIGHT DIVISION

**FISCAL NOTE**

L.R. No.: 0540-08  
Bill No.: SB 169  
Subject: Elections  
Type: Original  
Date: February 13, 2015

Bill Summary: This proposal modifies the law relating to voting procedures.

**FISCAL SUMMARY**

<b>ESTIMATED NET EFFECT ON GENERAL REVENUE FUND</b>			
FUND AFFECTED	FY 2016	FY 2017	FY 2018
General Revenue	Less than (\$6,308,360)	Less than (\$2,497,074)	Less than (\$2,084,025)
<b>Total Estimated Net Effect on General Revenue</b>	<b>Less than (\$6,308,360)</b>	<b>Less than (\$2,497,074)</b>	<b>Less than (\$2,084,025)</b>

<b>ESTIMATED NET EFFECT ON OTHER STATE FUNDS</b>			
FUND AFFECTED	FY 2016	FY 2017	FY 2018
Children's Trust	Unknown	Unknown	Unknown
Endowed Care Cemetery Audit	Unknown	Unknown	Unknown
MO Public Health Services	Unknown	Unknown	Unknown
Highway	Less than \$1,008,373	Less than \$581,674	Less than \$581,674
<b>Total Estimated Net Effect on <u>Other</u> State Funds</b>	<b>Unknown</b>	<b>Unknown</b>	<b>Unknown</b>

Numbers within parentheses: ( ) indicate costs or losses. This fiscal note contains 15 pages.

<b>ESTIMATED NET EFFECT ON FEDERAL FUNDS</b>			
<b>FUND AFFECTED</b>	<b>FY 2016</b>	<b>FY 2017</b>	<b>FY 2018</b>
<b>Total Estimated Net Effect on <u>All</u> Federal Funds</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>

<b>ESTIMATED NET EFFECT ON FULL TIME EQUIVALENT (FTE)</b>			
<b>FUND AFFECTED</b>	<b>FY 2016</b>	<b>FY 2017</b>	<b>FY 2018</b>
General Revenue	Less than 4 FTE	Less than 4 FTE	Less than 4 FTE
<b>Total Estimated Net Effect on FTE</b>	<b>Less than 4 FTE</b>	<b>Less than 4 FTE</b>	<b>Less than 4 FTE</b>

Estimated Net Effect (expenditures or reduced revenues) expected to exceed \$100,000 in any of the three fiscal years after implementation of the act.

<b>ESTIMATED NET EFFECT ON LOCAL FUNDS</b>			
<b>FUND AFFECTED</b>	<b>FY 2016</b>	<b>FY 2017</b>	<b>FY 2018</b>
<b>Local Government</b>	<b>Unknown</b>	<b>Unknown</b>	<b>Unknown</b>

## FISCAL ANALYSIS

### ASSUMPTION

#### §115.427 Photo ID to Vote

Officials at the **Department of Revenue (DOR)** assume, for the purpose of the fiscal note, all costs would be appropriated from the General Revenue Fund. DOR assumes the administrative impact of this proposal is as follows:

#### Driver License Bureau (DLB)

The proposed changes will require drafting updates to web site information related to nondriver licenses for voting purposes, updating office procedures, developing a format for nondriver license for voting purposes affidavit and developing a reporting form. Additionally, the Missouri Electronic Driver License system would need changing to define changes to issuance periods for a no cost driver license or nondriver license for voting and completion of end-user testing by our internal staff. This will require overtime from existing staff in order to perform the testing. See below:

FY 17

Update Web Page - Administrative Analyst III	10 hrs @ \$23.00 = \$ 230
Develop Affidavit - Management Analysis Spec I	40 hrs @ \$21.00 = \$ 840
Develop Procedures - Management Analysis Spec I	40 hrs @ \$21.00 = \$ 840
	<b>Total = \$1,910</b>

Requirements and procedures development and end user testing by DLB:

Administrative Analyst -	160 hrs @ \$29.00(1 1/2) per hr = \$4,640
Management Analyst Specialist II -	240 hrs @ \$24.00 per hr = \$5,760
Revenue Band Manager II -	40 hrs @ \$31.00 per hr = \$1,240
	<b>Total = \$11,640</b>

**Oversight** assumes DOR is provided with core funding to handle a certain amount of procedure updating activity each year and will not reflect these costs in the fiscal note.

To determine an estimated number of potential applicants who may be eligible for a nondriver (photo identification) at no cost, DOR compared the voter records on file with the Secretary of State's Office (SOS) to the current document holders on record with DOR. This comparison was completed in March 2009. According to SOS on January 6, 2012, the 2009 numbers have not statistically changed.

ASSUMPTION (continued)

253,496	Estimated number of individuals registered to vote who do not have photo identification on file with the Department of Revenue as of March 2009.
<u>125,795</u>	Estimated number of individuals with an expired photo identification document on file with the Department of Revenue, who may need to obtain an updated nondriver license for voting purposes
<b>379,291</b>	<b>Total estimated number of those who may be eligible for a nondriver license (photo identification) document at no cost.</b>
x <u>50%</u>	Estimated number of individuals who would apply for a nondriver license for voting purposes (based on average voter turnout for Missouri (derived from 2006 information).
<b>189,645</b>	<b>Potential nondriver license applicants in the first year of implementation FY 16</b>
189,646	Remaining number of registered voters who may be eligible for a photo identification document after first year of implementation. Based on 2009 counts.
÷ <u>2</u>	
<b>94,823</b>	<b>Estimated number of registered voters who may apply during subsequent fiscal years (FY2017).</b>

In addition, because the language allows a person to apply for a nondriver license at no cost by signing an affidavit indicating they do not have a valid photographic identification document, applicants who have held a document previously and have lost it, allowed it to expire, or other reasons, may now obtain a nondriver license at no cost.

137,750	Total new, renewal and duplicate nondriver licenses issued in FY 2013
x <u>25%</u>	Estimated number of applicants with prior document on file that would utilize the affidavit for a new, renewal or duplicate nondriver license, indicating they do not have any other acceptable form of photographic identification for voting purposes, making them eligible for a nondriver license at no cost to the applicant.
<b>34,438</b>	<b>Estimated annual nondriver license applicants with prior document on file.</b>

Licensing Cost

**FY 2016**

189,645	Potential nondriver license applicants first year of implementation FY2016
<u>34,438</u>	Estimated annual nondriver license applicants (previous document)
<b>224,083</b>	<b>Total</b>
x <u>\$2.25</u>	Cost per card of \$1.81 and mailing cost of \$0.44 per card
<b>\$504,187</b>	<b>Total estimated vendor cost FY 2016 for licensing material and mailing costs</b>

ASSUMPTION (continued)

**FY 2017 & 2018**

94,823	Estimated number of current registered voters who may apply during subsequent fiscal years
<u>34,438</u>	Estimated annual nondriver license applicants (previous document)
<b>129,261</b>	<b>Total</b>
<u>x \$2.25</u>	Cost per card of \$1.81 and mailing cost of \$0.44 per card
<b>290,837</b>	<b>Total estimated vendor cost for license document materials and mailings costs</b>

Direct Public Inquiries

While SOS is responsible for notifying individuals of the requirement to obtain photo identification for voting purposes, it is assumed that the majority of inquiries would be directed to the DOR as the document issuing agency.

Estimating a 50% potential applicant inquiry, DOR assumes that approximately 112,042 ((189,645 + 34,438)/2) inquiries through the central office will be received during the first implementation year and approximately 64,631 (94,823 + 34,438/2) calls in subsequent years. To provide the best call-in service for Missouri citizens DOR will need to add 4 FTE to handle the additional telephone inquiries.

112,042	Total potential applicants/inquiries first year of implementation.
÷ 264	Total days of service per annual period
424	
÷ 100	Estimated # of calls expected to be handled per FTE
4	Estimated # of FTEs required to handle increased call volume FY 2017

**Oversight** has, for fiscal note purposes only, changed the starting salary for the four Revenue Processing Technicians I (\$25,884) to correspond to the second step above minimum for comparable positions in the state's merit system pay grid. This decision reflects a study of actual starting salaries for new state employees over the last six months and policy of the Oversight Subcommittee of the Joint Committee on Legislative Research.

Officials at the **OA- Information Technology Services Division** assume modifications will need to be made in the amount of 1,425 hours at a cost of \$106,920.

Revenue Impact

Officials at **DOR** assume the revenue impact of this proposal states "the total cost associated with nondriver's license photo identification under this subsection shall be borne by the state of

ASSUMPTION (continued)

Missouri from funds appropriated to the department of revenue for that specific purpose".

For purposes of this fiscal note DOR assumes this includes only the nondriver license (NDL) cost under §302.181 and does not include the office processing fee allowed under §136.055 payable to the license offices. It is assumed DOR would be required to develop a tracking and processing fee distribution for each nondriver license issued for voting purposes under this proposal depending on the definition of 'total cost', the revenue impact could be increased or decreased.

**FY 2016**

244,083	Total Estimated NDL applicants FY 2016
x \$6.00	Nondriver License Fee
<b>\$1,344,498</b>	<b>Total estimated potential loss of revenue in FY 2016</b>

**FY 2017 & 2018**

129,261	Total estimated NDL applicants FY 2017 & 2018
x \$6.00	Nondriver License Fee
<b>\$775,566</b>	<b>Total estimated potential loss of revenue in FY 2017 &amp; 2018</b>

DOR will have to reimburse the license offices the loss in revenue from processing fees. The estimated initial loss in license office processing fees, which would have to be reimbursed to the offices by the State of Missouri, is shown below.

**FY 2016**

244,083	Total Estimated NDL applicants FY 2016
x \$5.00	Nondriver License Processing Fee
<b>\$1,120,415</b>	<b>Total estimated potential loss of revenue in FY 2016</b>

**FY 2017 & 2018**

129,261	Total estimated NDL applicants FY 2017 & 2018
x \$5.00	Nondriver License Processing Fee
<b>\$646,305</b>	<b>Total estimated potential loss of revenue in FY 2017 &amp; 2018</b>

Officials at the **Department of Health and Senior Services (DHSS)** assume this proposal requires voters to establish their identity and eligibility to vote by providing a form of personal identification to election officials. If an individual does not possess a valid form of personal identification, it may require them to obtain a copy of his/her certified birth certificate to acquire a driver's or non-driver's license. For individuals whose birth has not been recorded, it may cause them to apply for a delayed birth certificate. It is unknown and difficult to estimate the number

ASSUMPTION (continued)

that might be required to apply to the Bureau of Vital Records for these records.

The proposed legislation also requires the state to provide at least one form of identification required to vote at no cost to any qualified citizen who does not already possess such identification and desires to do so to vote. The proposed legislation does not appear to exempt the DHSS from collecting the necessary fees for copies of certified birth certificates as set forth in §193.265.1, RSMo. DHSS collects a \$15 fee for each birth certificate requested. This proposal could result in an unknown increase in revenue to General Revenue (\$4 of \$15), the Children's Trust Fund (\$5 of \$15), the Endowed Care Cemetery Audit Fund (\$1 of \$15), and the Missouri Public Health Service Fund (\$5 of \$15). The proposed legislation could also result in an unknown impact to the Bureau of Vital Records to issue the increased demand for birth certificate records.

Officials from the **Office of the Secretary of State (SOS)** state many bills considered by the General Assembly include provisions allowing or requiring agencies to submit rules and regulations to implement the act. The SOS is provided with core funding to handle a certain amount of normal activity resulting from each year's legislative session. The fiscal impact for this fiscal note to the SOS for Administrative Rules is less than \$2,500. The SOS recognizes that this is a small amount and does not expect that additional funding would be required to meet these costs. However, the SOS also recognizes that many such bills may be passed by the General Assembly in a given year and that collectively the costs may be in excess of what the office can sustain with the core budget. Therefore, the SOS reserves the right to request funding for the cost of supporting administrative rules requirements should the need arise based on a review of the finally approved bills signed by the governor.

**Oversight** assumes the SOS could absorb the costs of printing and distributing regulations related to this proposal. If multiple bills pass which require the printing and distribution of regulations at substantial costs, the SOS could request funding through the appropriation process.

**SOS** assumes implementation of these new identification provisions would require the state's election authority (SOS) and/or local election authorities to provide advance notice of the personal identification documents required to vote. The advance notice provided by the election authorities would include at a "minimum the use of advertisements and public service announcements in print, broadcast television, radio, and cable television media."

For fiscal year 2016 advance notice advertisements will be provided upon enactment of implementing legislation and prior to the March and April 2016 elections. For fiscal year 2017 advance notice advertisements will be provided to voters prior to the August 2016 and November

ASSUMPTION (continued)

2016 elections. For all subsequent years advance notice advertisements will be provided to voters prior to each federal primary and general election.

Assumptions include:

Production of radio and TV public service announcements-	\$2,000
Print ad to run twice before an election-	\$203,284
Cable television ad to run twice everyday for eight weeks-	\$299,472
TV and Radio ad to run through broadcast media-	<u>\$497,311</u>
Total-	\$1,002,067

Upon enactment of implementing legislation, SOS will send a mailer to all registered voters to notify them of the new identification requirements at a cost of \$2,003,628. A similar mailer will be sent before the 2018 Primary Election. For all other elections, the SOS will send mailings to newly registered voters prior to each election. Based on the estimated 355,007 newly registered voters in 2014, this mailer could cost \$173,953.

Mailing to all registered voters:

4,089,038 registered voters x \$0.49 postage, printing and processing= \$2,003,628

Mailing to newly registered voters prior to each election:

355,007 new registered voters x \$0.49 postage, printing and processing = \$173,953

The new photo identification requirements are not limited to statewide elections but will affect every election. The cost per fiscal year will vary based on the number of elections held. In addition to the general municipal election each April and the primary and general elections in August and November of even numbered years, there are additional days available for public elections in February, March and in August and November of odd numbered years, which are used only as needed.

**Oversight** assumes the SOS will only have 1 mass mailing and 1 public service announcement in FY 2016 to notify voters of the changes.

Officials at the **Office of Administration's Division of Budget and Planning (BAP)** assume no fiscal impact from this proposal to BAP. However, two provisions in this proposal may result in



ASSUMPTION (continued)

additional General Revenue expenditures. BAP defers to the Office of the Secretary of State, the Department of Revenue and the Department of Health and Senior Services for the estimate of these General Revenue expenses.

Officials at the **St. Louis County Board of Election Commissions** assumes the impact would be \$2,000-\$4,000 per election in even numbered years or if it is a county-only election.

Officials at the **Jackson County Board of Election Commission** assume the impact of this proposal would be \$100-\$1,000 for the reprinting of current publications and forms relating to acceptable forms of identification and \$500-\$600 for keeping the Election Authority open for an additional 4 hours.

**Oversight** assumes this proposal does not have a contingency clause and becomes effective August 28<sup>th</sup>, 2016. Therefore, Oversight will show costs beginning in FY 2016.

The proposal states that "the state shall provide at least one such form of the personal identification required to vote at no cost to any otherwise qualified citizen who does not already possess such identification and who desires the identification in order to vote." **Oversight** assumes that since the proposal requires the State to pay the legally required fees for a person to get a nondriver's license photo identification then General Revenue will make the fee payments to the Highway Fund, Cities and Counties. Oversight is showing the cost of the nondriver's license fee as a cost to General Revenue. The nondriver's license fee is split between the State Highway Fund, Cities and Counties.

§115.057 and §115.279 Advance Voting

Officials at the **Office of the Secretary of State (SOS)** assume each central voting location will be staffed by at least two election judges paid \$9 per hour for the 32 hours that it will be open for voting - a total of \$33,408 per election.

Officials at the **Platte County Board of Election Commissions** assume the costs associated with this proposal would include: one time purchase of new ID signage - \$600, staff overtime - \$3,500, 6 part time staff members during absentee voting - \$6,000, 10 absentee processing judges over 2 days - \$2,000, additional absentee ballot printing - \$800, additional absentee envelopes - \$500, additional publishing costs - \$400, for a total estimated cost of \$13,200.

Officials at the **Lincoln County Clerk's Office** assumes the increased costs associated with this

ASSUMPTION (continued)

proposal to be minimal. A possible increased number of absentee ballot requests may lead to additional costs not expected to exceed \$2,000 per election. The additional 12 hours the office would be open amounts to \$1,500 per election for an estimated total increased cost of not more than \$3,500 per election.

Officials at the **St. Louis City Board of Election Commission** assumes if there are any costs to be reimbursed by the State, the Local Election Authority (Local Election Authorities) would be required to pay any upfront costs of which the costs are unknown at this time. There could be some costs related to educating the public on the photo ID requirements, e.g. posters, mailings, etc.

Officials at the **Department of Public Safety** assume no fiscal impact from this proposal.

Officials at the following board of election commissions: Kansas City Board of Election Commission, and Clay County Board of Election Commission did not respond to **Oversight's** request for fiscal impact.

Officials at the following counties: Andrew, Atchison, Audrain, Barry, Bollinger, Boone, Callaway, Camden, Cape Girardeau, Carroll, Cass, Clay, Cole, Cooper, DeKalb, Dent, Franklin, Greene, Holt, Jackson, Jefferson, Johnson, Knox, Laclede, Lawrence, Marion, McDonald, Miller, Moniteau, Monroe, Montgomery, New Madrid, Nodaway, Ozark, Perry, Pettis, Phelps, Platte, Pulaski, Scott, Shelby, St. Charles, St. Louis, St. Francois, Taney, Warren, Wayne and Worth did not respond to **Oversight's** request for fiscal impact.

**Oversight** assumes a certain percentage of voters without ID's will choose to continue to fill out an affidavit when they vote instead of getting a free ID. Therefore, Oversight assumes DOR's estimates regarding the number of free ID's issued is high and will assume the actual impact will be "less than" DOR's estimates.

<u>FISCAL IMPACT - State Government</u>	FY 2016 (10 Mo.)	FY 2017	FY 2018
<b>GENERAL REVENUE</b>			
<u>Revenue</u> - DHSS Fees for Birth Certificates (\$4 of \$15 fee)	Unknown	Unknown	Unknown
<u>Cost</u> - Dept of Revenue/OA-ITSD computer programming changes	(\$106,920)	\$0	\$0
<u>Transfer Out</u> - Dept of Revenue - reimbursement of the NDL fee paid to the Highway fund (75%)	(Less than \$1,008,373)	(Less than \$581,674)	(Less than \$581,674)
<u>Transfer Out</u> - Dept of Revenue - reimbursement of the NDL fee paid to the cities & counties (25%)	(Less than \$336,125)	(Less than \$193,892)	(Less than \$193,892)
<u>Cost</u> - Dept of Revenue - revenue office processing fee reimbursement	(Less than \$1,120,415)	(Less than \$646,305)	(Less than \$646,305)
<u>Costs</u> - Dept of Revenue	Less than...	Less than...	Less than...
Personal Service	(\$86,280)	(\$104,571)	(\$105,617)
Fringe Benefits	(\$44,870)	(\$54,382)	(\$54,926)
Expense and Equipment	(\$28,679)	(\$3,330)	(\$3,413)
Licensing Materials/Vendor NDL Card	(\$504,187)	(\$290,837)	(\$290,837)
<u>Total Cost</u> - Dept of Revenue	(\$664,016)	(\$453,120)	(\$454,793)
FTE Change - DOR	4 FTE	4 FTE	4 FTE
<u>Costs</u> - Secretary of State - advertising			
Public Service Announcements	(\$1,002,067)	\$0	\$0
Mailings to Voters	(\$2,003,628)	(\$521,859)	(\$173,953)
Election Judges for Advanced Voting	(\$66,816)	(\$100,224)	(\$33,408)
<u>Total Costs</u> - SOS	(\$3,072,511)	(\$622,083)	(\$207,361)
<b>ESTIMATED NET EFFECT ON GENERAL REVENUE</b>	<b>Less than <u>(\$6,308,360)</u></b>	<b>Less than <u>(\$2,497,074)</u></b>	<b>Less than <u>(\$2,084,025)</u></b>
Estimated Net FTE Effect on General Revenue	Less than 4 FTE	Less than 4 FTE	Less than 4 FTE

<u>FISCAL IMPACT - State Government</u> (continued)	FY 2016 (10 Mo.)	FY 2017	FY 2018
<b>CHILDREN'S TRUST FUND</b>			
<u>Revenue</u> - DHSS Fees for Birth Certificates (\$5 of \$15 fee)	<u>Unknown</u>	<u>Unknown</u>	<u>Unknown</u>
<b>ESTIMATED NET EFFECT ON CHILDREN'S TRUST FUND</b>	<b><u>Unknown</u></b>	<b><u>Unknown</u></b>	<b><u>Unknown</u></b>
<b>ENDOWED CARE CEMETERY AUDIT FUND</b>			
<u>Revenue</u> - DHSS Fees for Birth Certificates (\$1 of \$15 fee)	<u>Unknown</u>	<u>Unknown</u>	<u>Unknown</u>
<b>ESTIMATED NET EFFECT ON ENDOWED CARE CEMETERY AUDIT FUND</b>	<b><u>Unknown</u></b>	<b><u>Unknown</u></b>	<b><u>Unknown</u></b>
<b>MISSOURI PUBLIC HEALTH SERVICE FUND</b>			
<u>Revenue</u> - DHSS Fees for Birth Certificates (\$5 of \$15 fee)	<u>Unknown</u>	<u>Unknown</u>	<u>Unknown</u>
<b>ESTIMATED NET EFFECT ON MISSOURI PUBLIC HEALTH SERVICE FUND</b>	<b><u>Unknown</u></b>	<b><u>Unknown</u></b>	<b><u>Unknown</u></b>
<b>HIGHWAY FUND</b>			
<u>Transfer In</u> - Highway - NDL fee (75%)	Less than <u>\$1,008,373</u>	Less than <u>\$581,674</u>	Less than <u>\$581,674</u>
<b><u>ESTIMATED NET EFFECT ON HIGHWAY FUND</u></b>	<b><u>Less than \$1,008,373</u></b>	<b><u>Less than \$581,674</u></b>	<b><u>Less than \$581,674</u></b>

**FISCAL IMPACT - Local Government**

FY 2016  
(10 Mo.)

FY 2017

FY 2018

**LOCAL POLITICAL SUBDIVISION FUNDS**

Revenue - Local Dept of Health - birth certificate fees (\$15 if birth certificate is obtained at local public health agency)

Unknown

Unknown

Unknown

Transfer In - Cities & Counties - reimbursement by General Revenue of NDL fee.

Less than  
\$336,125

Less than  
\$193,892

Less than  
\$193,892

**ESTIMATED NET EFFECT ON LOCAL POLITICAL SUBDIVISION FUNDS**

Unknown

Unknown

Unknown

**FISCAL IMPACT - Small Business**

No direct fiscal impact to small businesses would be expected as a result of this proposal.

**FISCAL DESCRIPTION**

Currently, in order to vote absentee, voters must provide an excuse for not being able to vote in-person on the designated election day. This act allows any person to vote absentee in person without such an excuse beginning the second Tuesday prior to an election and ending at 5 p.m. on the Monday before the election. Such voting shall occur during regular business hours at the election authority, including for a period of eight consecutive hours on each Saturday during such period. The act requires the General Assembly to appropriate funds to cover the additional staffing costs for such early voting.

This act establishes identification requirements for voting. Voters shall produce a nonexpired Missouri driver's license; a nonexpired or nonexpiring Missouri nondriver's license; any identification containing a photograph issued by the Missouri National Guard, the United States armed forces, or the United States Department of Veterans Affairs; or any document issued by the State of Missouri or the United States that contains the name of the individual seeking to vote, a photograph of the individual, and an expiration date later than the date of the most recent

FISCAL DESCRIPTION (continued)

general election.

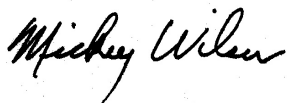
Individuals who appear without an approved form of photo identification may vote if they sign an affidavit and present a secondary form of identification. Secondary forms of identification are limited to ID's issued by an institution of higher education; a copy of a current utility bill, bank statement, government check, paycheck, or other government document that contains the name and address of the voter; or a driver's license or state identification card issued by another state.

The election authority shall provide advance notice of the identification requirements to be included in the election authority's elections notices.

The state shall provide one approved form of photo notification required to vote at no cost to any voter who does not already possess such photo identification, who qualifies for such photo identification, and who desires such photo identification in order to vote. Such a voter may apply for a non-driver's license at no cost after signing an affidavit to verify that he or she does not already have any form of photo identification approved for voting. The total cost of providing such photo identification shall be borne by the state of Missouri from funds appropriated to the department of revenue for that specific purpose.

SOURCES OF INFORMATION

Office of the Secretary of State  
Office of Administration's Division on Budget and Planning  
Department of Revenue  
Department of Public Safety  
Platte County Board of Election Commission  
St. Louis Board of Election Commissions  
Lincoln County Clerk's Office  
St. Louis City Board of Election Commission  
Jackson County Board of Election Commission



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