



*Midwestern Legislative Conference
of
The Council of State Governments*

Election Reform Recommendations

**Final Report
of the
MLC Elections Task Force**

August 2002

*Task Force Co-Chairs:
Rep. Stephen Freese, Wisconsin
Sen. Steve Kelley, Minnesota*

Election Reform Recommendations

Final Report of the MLC Elections Task Force

Executive Summary

The Midwestern Legislative Conference Elections Task Force was established in 2001 to develop a set of election reform policy recommendations for consideration by states and lawmakers in the Midwest. Co-chaired by Wisconsin Representative Stephen Freese and Minnesota Senator Steve Kelley, the 18-member task force completed its work in the summer of 2002 by approving a set of 35 recommendations addressing six major issue areas:

The task force's recommendations are presented by topic in this report, which includes the following components:

- I. Introduction – The Impetus for Reform
- II. Task Force Recommendations
 - Section 1. Voter Registration and Database Procedures*
 - Section 2. Positive Voter Identification*
 - Section 3. Polling Procedures*
 - Section 4. Presidential Selection Process*
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Upon approval by the full Midwestern Legislative Conference, the task force's recommendations will be released for distribution to state legislators, election administrators, select members of Congress and interested others.

Election Reform Recommendations

Final Report of the MLC Elections Task Force

I. Introduction – The Impetus for Reform

In the aftermath of the controversial election of 2000, the issue of election reform soared to the top of legislative agendas in Congress and in statehouses across the country. Though its result was debatable, the presidential contest had clearly demonstrated that change was needed, both in the mechanics and in the administration of the nation's elections. Would-be reformers, intent upon shoring up the fundamental rite of American democracy, quickly turned their attention to a wide range of election-related issues, and even before the new president was sworn in, sweeping reform measures were introduced or under development in states from one end of the country to the other.

In the months that followed, more than 2000 election reform bills were introduced in state legislatures, and dozens of commissions and study committees were established to tackle the challenge of strengthening the election process. By the end of 2001, however, many of these efforts were either proceeding slowly or had already stalled, and as a new election year began, arguably little had changed nationally. Only a small fraction of the state-level initiatives had been enacted into law, and competing proposals were still making their way through the House and Senate in Washington. Although significant reforms had been adopted in several states, others had been displaced on legislative calendars by new priorities following the events of September 11. Still others fell by the wayside due to financial constraints as the economy turned down and state budget resources grew scarce.

Not surprisingly, the pace of election reform efforts at the state level declined in 2002, with fewer bills being introduced and an even smaller share winning approval. Again, there were notable advances in individual states where significant election law changes were enacted, and a Congressional conference committee was appointed to resolve differences between the House and Senate versions of federal reform legislation. But overall, much work remains to be done. As another election season approaches, and with the next presidential race just two years away, the unfinished business of election reform promises to attract additional attention – and renewed efforts at the state and federal levels – in the months to come.

The MLC Elections Task Force

Under the leadership of Nebraska Senator DiAnna Schimek, Immediate Past Chair of the Midwestern Legislative Conference (MLC) of The Council of State Governments, the MLC established an Elections Task Force in 2001 charged with examining a variety of election-related issues and, as appropriate, developing recommendations for consideration by the full Midwestern Legislative Conference. Wisconsin Representative Stephen Freese and Minnesota Senator Steve Kelley were appointed to serve as co-chairs of the 18-member task force, which included fifteen legislators and three secretaries of state representing eleven Midwestern states.

The task force was directed to consider a broad range of election administration concerns, including voting and registration practices, contested election procedures and more. But it was also charged with examining

the potential impact of federal election reform efforts on the states, the presidential candidate selection process (including possible changes in the primary election system), and the Electoral College.

In addition to fulfilling this broad charge by developing a set of recommendations to improve the electoral process in the Midwest, the task force informally agreed to pursue several other objectives during the course of its work. Specifically, the task force sought to bring renewed attention to those issues that have not yet been sufficiently addressed by the states, to identify best practices and incorporate them into its recommendations whenever possible, and to focus on those areas where the task force believed it could best add value to the larger election reform debate.

The task force met for the first time in Lincoln, Nebraska during the summer of 2001. At that meeting, task force members heard presentations on a number of election reform issues before approving a resolution urging Congress to respect the traditional primacy of state and local governments in the administration of elections by refraining from mandating specific election administration procedures (*see Appendix 4*). Then, in the spring of this year, it began working to develop the following set of policy recommendations.

The first step was to identify a set of priority issue areas. These are reflected in the headings of the six subsections into which the task force recommendations have been divided. Next, the task force examined various reform measures that had been enacted to date and the recommendations of more than a dozen other election reform commissions and study committees in an effort to identify issues requiring further consideration and ideas meriting additional support. Then, during a series of audio teleconferences over a four-month period beginning last spring, the task force considered and debated nearly eighty potential policy recommendations in the course of developing and approving the thirty-five that follow.

These recommendations are intended to assist the states represented by the Midwestern Legislative Conference as they independently pursue their own election reform efforts. They are also intended to convey to readers the task force's strong sense of the appropriate respective roles of the state and federal governments with respect to the administration of elections. These recommendations have been submitted to the full Midwestern Legislative Conference for further consideration and, upon approval, will be released for distribution to legislators, election administrators and other state officials across the Midwest, as well as to select members of Congress and interested others.

II. Task Force Recommendations

Section 1. Voter Registration and Database Procedures

The establishment and maintenance of accurate, accessible and secure voter registration systems emerged as high priorities following the 2000 elections. By some estimates, more than a million qualified voters were turned away from the polls on election day due to registration-related issues, many of which reflected serious problems related to the processing of registration information, the sharing of data between various government agencies, the maintenance of accurate voter information over time, and procedures for addressing discrepancies on election day. In addressing these concerns, the MLC Elections Task Force was mindful of the fact that the states have traditionally taken very different approaches to the registration of voters. Therefore, while endorsing the concept of statewide voter registration databases for those states that require pre-election registration, the task force stopped short of urging all states to pursue this alternative, and it specifically called on Congress to refrain from mandating any single system of voter registration. Similarly, without urging states to pursue specific networking options that may, in some cases, be cost prohibitive or unnecessary due to local conditions, the task force recommended that states continue working to make statewide voter registration data more easily accessible at the local level. The task force also recommended ways to ensure the accuracy of registration data, while seeking to preserve the rights of individuals who might be affected by efforts to purge outdated information.

A. Merging/integration of data sources.

- *Congress should refrain from requiring the states to implement any single system of pre-election voter registration. However, should such a mandate be included in any federal legislation, it should be contingent upon the availability of sufficient federal funding to facilitate state compliance with the requirement.*
- *Those states that do require pre-election voter registration should establish statewide electronic voter registration databases.*
- *Statewide voter registration databases should be linked to, and easily accessible from, local registration offices and other relevant public agencies. The states are encouraged to experiment with and test other means of improving the accessibility of registration information, such as linking individual polling places to statewide databases.*

B. Policies regarding purging, data sharing, etc.

- *Procedures governing the purging of duplicate registrations should include sufficient notice to affected voters and an opportunity to correct errors in a timely fashion. Procedures governing the purging of registrants for nonparticipation should also include sufficient notice to affected voters, consistent with the provisions of the National Voter Registration Act.*
- *State and federal lists of deceased persons, convicted felons, and non-citizens should be consulted during the purging process.*
- *States should use driver's license numbers or other unique identifiers and/or other information contained in state records to facilitate the purging of duplicate registrations.*

C. Miscellaneous

- *To the extent possible, states should simplify their registration procedures and should permit voters to update their registration records on election day.*
- *States should clarify the voting rights of convicted felons and the criteria for restoring voting privileges to those who have completed their sentences. This information should be clearly communicated to all voter registration authorities.*

Section 2. Positive Voter Identification

Few election reform issues have proven to be as divisive as the question of voter identification. The effort to strike an appropriate balance between concerns related to the integrity of election procedures and the civil rights of voters has been challenging, and this issue emerged as one of the key sticking points during Congressional deliberations over federal election reform. While most would agree that appropriate measures to prevent election fraud are necessary, voter identification requirements that potentially make it harder for eligible voters to participate in elections are a concern to many. In addressing this delicate issue, the MLC Elections Task Force articulated its belief that protecting the integrity of public elections should be a high priority for the states. At the same time, the task force drew a distinction between pre-registered voters and election day registrants in suggesting appropriate identification requirements, and it left to the states themselves the task of specifying the forms that acceptable identification might take. Finally, in an effort to ensure that no eligible voter is denied the right to vote due to an election day issue over the voter's identity (or the sufficiency of the voter's identification), the task force also called upon the states to allow for provisional voting.

- *When developing policies regarding voter identification, states should give priority to the goal of protecting the integrity of public elections.*

- *States should establish a single, statewide, unique voter identification number system to reduce fraud and to ensure the accuracy of registration databases.*
- *On election day: A) pre-registered voters should be required only to sign affidavits of identity or to otherwise affirm their registration information; B) same-day voter registrants should be required to provide some positive proof of identification (e.g., a government-issued photo ID; an equivalent proof of identity from one or more other sources; etc.), as specified by state law, or to sign an affidavit of identity; and C) provisional voting should be permitted when a voter's identity is at issue or when photo identification is required but not produced by a voter.*

Section 3. Polling Procedures

In addressing some of the “nuts and bolts” issues related to the administration of elections, the MLC Elections Task Force developed recommendations touching on everything from voter education, poll worker training and the accessibility of the election process to the casting and counting of votes, the handling of contested elections and the certification of new election technologies. In general, however, the task force opted to limit its recommendations to relatively broad statements of policy, while leaving many of the related details to the discretion of individual states. For example, while urging states to adopt clear definitions pertaining to voting and voter intent, the task force did not recommend specific definitions. The task force called for cooperative action at all levels of government (and with education and the media) to provide improved voter education programs, and it encouraged states to expand the pool of potential poll workers while providing recruits with better training. It also urged states to establish specific procedures governing the counting and recounting of votes for each type of voting system used, but it refrained from recommending a preferred voting technology. Instead, the task force urged states to resist efforts to establish uniform national voting systems and procedures, but it endorsed the adoption of uniform national standards for the certification and performance of various technologies. The task force also called on states to address widespread concerns about equal access to the election process by taking steps to ensure that polling places, election equipment, ballots, and information are all equally accessible to all eligible voters and by providing additional alternatives to election-day voting. In hopes of making information on “best practices” more readily available to the states, the task force also urged The Council of State Governments and its affiliates to establish a new clearinghouse on election administration.

A. Voter education

- *Federal, state and local governments should establish, and provide resources for, new/improved voter education programs and should play a leadership role in encouraging additional voter education efforts by the media and others.*

B. Poll worker training and recruitment

- *States should expand the pool of potential poll workers by permitting/encouraging the recruitment of split-shift workers, high school students and retired citizens, and by urging/requiring employers to provide paid leave for public- and private-sector employees who serve as poll workers.*
- *States should explore expanding the pool of potential poll workers to include individuals who are third-party and no-party members.*
- *States should establish, and provide resources for, new/improved poll worker training programs.*

C. Accessibility (of polling places, equipment and ballots)

- *States and counties should ensure non-discriminatory, equal and secure access to the voting process (including physical access to polling places and equipment, as well as access to information about ballots, candidates and issues) for all voters.*
- *States should permit additional alternatives to election-day voting in polling places, such as early voting, no-excuse absentee voting and permanent absentee voting for voters with disabilities.*

D. Voting, vote counting/recounting standards and procedures (definition of a vote), voter rights

- *States should resist efforts to establish uniform national voting systems and procedures.*
- *States should adopt clear definitions of what constitutes a vote for each type of voting system used; the definitions should seek to recognize voter intent and should specify how voter intent is to be determined.*
- *Each state should establish clear, uniform rules and procedures governing the counting and recounting of votes for each type of voting system used, including procedures covering manual recounts of ballots.*
- *States should enact clear, uniform rules and procedures governing contested elections, including the right to request recounts and/or automatic recounts in close races, and they should allow sufficient time for recounts to be completed before election results are required to be certified.*

E. New technologies

- *The states should adopt uniform national standards governing the certification, decertification and performance of voting systems and new technologies.*

F. Miscellaneous

- *States should periodically review their election codes for clarity, and they should update their compliance provisions based on established best practices.*
- *The Council of State Governments (and its affiliates) should establish an information clearinghouse on best practices in election administration and should work to collect and archive more complete election-related data.*

Section 4. Presidential Selection Process

One of the task force's specific charges was to consider the presidential selection process, including both the nomination of candidates and the operation of the Electoral College, with an eye toward ensuring that voters in the Midwest continue to be heard during future presidential elections. The task force looked at several alternatives to the existing system of presidential primaries, as well as potential refinements in the Electoral College process (including the means of selecting electors), before agreeing to two recommendations. While urging the states to take a closer look at a proposed rotating system of regional presidential primaries, the task force also recognized the importance of preserving the traditional "first-in-the-nation" status of both the Iowa caucuses and the New Hampshire primary.

A. Electoral College

- *Congress should not seek to replace the Electoral College with a direct popular vote system.*

B. Candidate nomination process

- *States should consider establishing a rotating system of regional presidential primaries, with exemptions for the states of New Hampshire and Iowa, as previously recommended by the National Association of Secretaries of State.*

Section 5. Timing and Release of Election Results

The national media's coverage of the 2000 presidential election, including repeated changes in the projected outcome, rekindled a recurring debate over various issues related to the timing and release of election results. Of primary concern is the potential impact of reported results on voter behavior in jurisdictions where the polls remain open. In addressing this area, the MLC Elections Task Force sought to ensure that voters have equal access to the polls, regardless of where they live, and that states take steps to prevent or minimize the potentially negative impact of early projections by more carefully controlling the timing and release of official election results.

- *To the extent possible, states should adopt uniform statewide polling hours. If this is not possible (e.g., in states with multiple time zones), states should at least ensure that all voters are afforded the same number of hours to cast their votes.*
- *States with multiple time zones should embargo the release of election results from their eastern-most time zones until all polls have closed statewide.*
- *The Midwestern states should embargo the release of presidential election results until all polls have closed in the continental United States.*

Section 6. Respective Roles of the States and the Federal Government

One of the highest priorities of the MLC Elections Task Force was its desire to address the respective roles of the state and federal governments in implementing election reform. At its very first meeting, the task force approved a resolution, later endorsed by the full Midwestern Legislative Conference, urging Congress to refrain from mandating election administration procedures, in deference to the primary responsibilities of state and local governments in this area. Still, the task force recognized that for meaningful reform to occur, additional federal funding for elections is essential. As it completed its work, the task force identified several funding priorities, and it called upon the federal government to provide the needed assistance without encroaching on traditional state authority over the administration of elections. The task force also urged the federal government to provide funding in the form of block grants, preserving the flexibility of states to direct the resources where they are needed most.

- *States should retain primary authority and control over the administration of elections.*
- *The federal government should refrain from mandating the implementation of a single national voter registration system or the use of a single voting system.*
- *The federal government should provide additional funding to state and local governments for new registration systems, voting technology R & D, the development of new system standards, the testing of new technologies, voting system upgrades, improved accessibility of polling places, more accurate/secure vote counting procedures, and other election administration costs.*
- *The federal government should provide additional funding for voter education programs and poll worker training.*
- *Federal funding should be provided in the form of block grants that provide sufficient flexibility for states to individually identify and address their most pressing needs.*
- *Any formula for the distribution of federal funds should include a minimum, per state component reflecting the base cost of election administration and a variable, population-based component.*

III. Appendices

Appendix 1. Overview of Recent Midwestern Election Reform Efforts

Nationwide, more than 3,500 election reform bills have been introduced in state legislatures since the elections of November 2000. To date, barely 12% have been signed into law. Here in the Midwest, just 70 of almost 450 such measures have been enacted, but others are still pending, and more are sure to come.

If the numbers prove anything, it may only be that reform is easier to start than it is to finish. A closer look at the bills that have passed indicates that the progress to date has been uneven. During the last two legislative cycles, all 11 states represented in the Midwestern Legislative Conference enacted new election laws, but the significance of those measures varied widely. A few states tackled the toughest issues head on, while others were more deliberate in their approach. Some passed comprehensive reform bills, but most addressed select concerns. Several established study committees, some of which have completed their work while others are continuing.

By the summer of 2002, most Midwestern states could point to at least some progress on the election reform front. In Ohio, for example, lawmakers had approved legislation establishing standards for determining voter intent and for handling punch card ballots with “hanging chads.” Iowa moved to eliminate punch cards altogether, while Michigan voted to establish a uniform statewide voting system.

Several states acted to improve voter registration procedures. Some established new statewide databases, while others worked to enhance the accessibility of existing data. A few states addressed the question of voter identification, while others focused on issues ranging from voter education, poll worker training and contested elections to polling hours, provisional balloting and voting system standards.

Highlights from around the region included comprehensive reforms in Indiana that spell the end of punch card ballots while enhancing the interactivity of the state’s voter registration system, ensuring the accessibility of elections for all voters, and expanding the pool of potential poll workers. Lawmakers in Indianapolis also approved new provisional balloting guidelines and established a voting system improvement fund to assist local election administrators in upgrading their voting systems.

Minnesota also established a matching grant fund to assist local governments in acquiring new voting technologies. Kansas legislators passed a bill to provide uniform statewide polling hours, while the Nebraska legislature approved provisional balloting and addressed the voting rights of convicted felons. South Dakota moved to shore up the maintenance of its statewide voter data while addressing concerns related to the counting and recounting of votes. Lawmakers in Pierre also approved a measure expressing their support for preserving the Electoral College.

These and other reform efforts have produced a patchwork of new laws that will change the way Midwesterners experience future elections. But the issues remaining to be addressed across the region are numerous, and additional reforms are likely to follow as lawmakers throughout the Midwest work to fill in the gaps and restore public confidence in the electoral process.

Appendix 2. Resources

A. Select Resource List for Election Reform Information

electionline.org www.electionline.org

A non-partisan, non-advocacy website providing up-to-the-minute news and analysis on election reform. The site was established by the Election Reform Information Project with funding from the Pew Charitable Trust. The site offers:

- the latest election reform news
- links to commission and task force reports on election reform
- links to information on existing election laws and regulations
- other information on election administration

The Constitution Project's Election Reform Initiative www.constitutionproject.org/eri/index.htm

An effort to promote bipartisan consensus on needed election reforms, funded by the William and Flora Hewlett Foundation and the David and Lucile Packard Foundation. The website offers:

- links to special reports developed in conjunction with electionline.org (provisional voting, statewide voter registration databases, voter identification, etc.)
- updates on the status of federal legislation
- other information on state and federal election reform efforts

The Election Center www.electioncenter.net

A nonprofit organization dedicated to promoting, preserving and improving democracy. Its members include registrars, election supervisors, election directors, and other state and local election officials. The website offers:

- information on professional education for election administrators
- information on approved voting systems and independent testing
- other election administration information and links

Federal Election Commission (FEC) www.fec.gov

Independent federal regulatory agency with jurisdiction over campaign finance and other election-related issues. The website offers:

- information on elections, voting, campaign finance, federal regulations, recent developments and more
- information on federal voting system standards

National Association of Secretaries of State (NASS) www.nass.org

Non-partisan association fostering interstate cooperation and the exchange of information and ideas between the nation's Secretaries of State. The NASS website offers:

- a link to the NASS election reform best practices report
- links to individual state election reform white papers and reports

National Association of State Election Directors (NASED) www.nased.org

Non-partisan association of state-level election directors. The website offers:

- information on the testing and certification of voting systems
- links to individual state election websites (containing information on voter and candidate registration, voter turnout, ballots, referenda and more)

**NCSL Database
on Election**

Reform Legislation www.ncsl.org/programs/legman/elect/taskfc/database.htm

A fully searchable database established by the National Conference of State Legislatures and maintained with assistance from the Election Reform Information Project. The site includes:

- current information on the status of state election reform legislation
- summaries of all election reform bills introduced in the states during the last two years

B. Other Resources Consulted by the MLC Elections Task Force

National Reports and Recommendations

“Counting All the Votes: The Performance of Voting Technology in the United States”
(University of California, Berkeley – September 2001).

“An Agenda for Election Reform” (The Brookings Institution – June 2001).

“Voting – What Is, What Could Be” (Caltech/MIT Voting Technology Project – July 2001).

“Building Consensus on Election Reform” (The Constitution Project – August 2001).

“Election 2000: Review and Recommendations by the Nation’s Elections Administrators”
(The Election Center, National Task Force on Election Reform – July 2001).

“Report on Election Systems Reform” (George Washington University – July 2001).

“Report of the National Workshop on Internet Voting: Issues and Research Agenda” (Internet Policy Institute – March 2001).

“Report and Recommendations to Improve America’s Election System” (National Association of Counties/National Association of County Recorders, Election Officials and Clerks, National Commission on Election Standards and Reform – May 2001).

“NASS State-by-State Election Reform Best Practices Report” (National Association of Secretaries of State – August 2001).

“Federal Election Recommendations” (National Association of State Election Directors – August 2001).

“To Assure Pride and Confidence in the Electoral Process: Task Force Reports” (National Commission on Election Reform – July 2001).

“Voting in America: Final Report of the NCSL Elections Reform Task Force” (National Conference of State Legislatures – August 2001).

Individual State Reports and Recommendations

“In the Best Interest of the Voter” (Indiana Bipartisan Task Force on Election Integrity – October 2001).

“Iowa’s Election 2000: Facts, Findings and Our Future” (Iowa Secretary of State Chet Culver – March 2001).

“Six-Point Election Improvement Plan” (Kansas Secretary of State Ron Thornburgh – 2001).

“Uniform Voting in Michigan: A Report to the Legislature” (Michigan Secretary of State Candice Miller – June 1997).

“Voting Reform: A Report of the People” (Michigan Task Force on Voting Reform – September 2001).

“Election Task Force Report” (Nebraska Election Task Force – March 2002).

“Draft of Final Recommendations” (Ohio Election System Study Committee – 2001).

Appendix 3. The MLC Elections Task Force



Co-Chairs:

Representative Stephen J. Freese, *Wisconsin*
Senator Steve Kelley, *Minnesota*

Members:

Representative Mike Boland, *Illinois*
Senator Sue Landske, *Indiana*
Representative Jonathan Weinzapfel, *Indiana*
Secretary of State Chet Culver, *Iowa*
Senator Barbara Allen, *Kansas*
Secretary of State Ron Thornburgh, *Kansas*
Representative Mickey Mortimer, *Michigan*
Representative Eric Lipman, *Minnesota*
Senator Edward Oliver, *Minnesota*
Senator DiAnna Schimek, *Nebraska*
Representative Duane L. DeKrey, *North Dakota*
Representative Lois Delmore, *North Dakota*
Secretary of State J. Kenneth Blackwell, *Ohio*
Senator Daniel Brady, *Ohio*
Representative Gary Cates, *Ohio*
Representative William G. Peterson, *South Dakota*

Staff: Mike McCabe, Director, CSG Midwestern Office

Appendix 4. MLC Resolution on Election Reform (Adopted August 1, 2001)



Midwestern Legislative Conference

**Resolution
on
*Election Reform***

- WHEREAS,** the right to vote in free and fair elections is one of the cornerstones of American democracy; and
- WHEREAS,** historically, the administration of elections has been primarily a function of state and local governments, while the federal role in election administration has been limited; and
- WHEREAS,** recent election-related concerns have prompted officials at all levels of government to take a closer look at the nation's electoral process and to seek improvements in the administration of elections; and
- WHEREAS,** legislation now pending in Congress would impose significant new mandates on state and local governments with respect to the administration of elections; and
- WHEREAS,** additional federal mandates would only jeopardize the ability of state and local election administrators to effectively address election issues within their jurisdictions by denying them the flexibility to implement solutions that are tailored to meet their unique circumstances; and
- WHEREAS,** additional resources for states seeking to upgrade their voting systems would be far more likely to promote effective election reform than would a "one-size fits all," federally-mandated system of election administration; now therefore be it
- RESOLVED,** that the Midwestern Legislative Conference recognizes that the administration of elections is, and should remain, principally a function of state and local governments; and be it further
- RESOLVED,** that the Midwestern Legislative Conference calls upon the Congress of the United States to refrain from mandating state and local election administration procedures; and be it further
- RESOLVED,** that the federal government can best ensure the continued improvement of election administration throughout the United States by providing additional funding assistance to state and local election authorities; and be it further
- RESOLVED,** that copies of this resolution shall be transmitted to the appropriate members of Congress and to the Bush administration.



The Council of State Governments was founded in 1933 as a national, nonpartisan organization to assist and advance the institution of state government. CSG's headquarters office, located in Lexington, Kentucky, is responsible for a variety of national programs and services, including research, reference publications, innovations transfer, suggested state legislation and trends analysis. The CSG Midwestern Office supports several regional groups of state officials, including the Midwestern Governors' Conference and the Midwestern Legislative Conference, an association of all legislators representing 11 states: Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Nebraska, North Dakota, Ohio, South Dakota and Wisconsin. The Canadian provinces of Ontario and Saskatchewan are affiliate members of the MLC.